

Minnesota Attorney General: Administrative Rules Proceedings

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Richard A. Wexler
Assistant Attorney General
Health Department

11-7-77

#344

- MHD 181

ADMIN 1000

STATE OF MINNESOTA

DEPARTMENT ATTORNEY GENERAL

Office Memorandum

TO : Michael Miller
Special Assistant Attorney General
Department of Administration
G19-K Administration Building

DATE: September 21, 197

FROM : Richard A. Wexler
Assistant Attorney General

PHONE: 296-5370

SUBJECT: Submission for Review and Approval of Department of Health Amendments to Rules Relating to the Use of X Ray Machines for Screening Purposes

Mike, enclosed are amendments adopted by the Commissioner of Health to Minn. Rule MHD 181 which would prohibit the use of x ray machines for screening purposes in the detection and evaluation of health conditions unless approved by the Commissioner. Screening has basically been defined as the use of x ray to detect various health conditions on a mass basis as opposed to having an individually ordered x ray by physician or other health professional. As you probably remember, it used to be quite common to screen large numbers of individuals with x ray for the detection of tuberculosis. This use of x ray has also been used to screen large numbers of people for other health conditions. However, as time has passed, numerous studies have been conducted which show that as a general rule screening by x ray is not a productive health detection device. In addition, many other screening methods have been devised which are as effective. Consequently, just about any advisory or professional group knowledgeable about x rays and the resultant exposure to radiation has recommended discontinuance of the use of x rays as screening devices. The primary underlying reason for that is the rule of thumb that all radiation exposure should be avoided unless in specific cases the health benefit outweighs the detriment of being exposed to radiation.

The rule does not prohibit the use of x rays for screening purposes. It merely requires an applicant desiring to run a screening program to obtain approval from the Commissioner of Health prior to conducting a screening program. The burden, of course, is on the applicant to show that there is a definite health need which cannot be met through alternative methods and which outweighs the detriment of exposing individuals to radiation. The bulk of the rule relates to the application process and information which must be submitted by the applicant. In addition, the rule provides for several different means for withdrawing the Commissioner's approval upon the finding of the existance of conditions which would result in serious over-exposure, discrepancies between the screening program as implemented and as described in the application, or for violation of the Department's existing rules relating to radiation.

You will quickly find out upon reviewing the material that the hearing was held quite some time ago, prior to the establishment of the Office of Hearing Examiners. Consequently the findings of fact are those of the Department only and the rules have not been submitted to the Office of Hearing Examiners for determination as to whether or not there were substantial changes. You may remember that I called you about this a month or so ago and you agreed that since the hearing was held prior to the establishment of the Hearing Examiner's Office that the rules should be submitted directly to you.

In terms of changes in the rules from the form initially submitted at hearing and the form approved by the Commissioner and submitted to you, it is the Department's position, which I agree in, that any changes are merely of a clarifying nature. For your information, the most noteworthy ones are specifically addressed in the findings of fact.

Along with five copies of the rule as initially adopted are included all of the supporting documents as well as the transcript and all exhibits submitted at the public hearing. Since the rules were approved by the Commissioner after the legislature abolished the State Board of Health, the certificate of board's adoption of rules resolution is necessarily not included in the documents.

If you have any questions concerning any aspect of the amendment to Minn. Rule MHD 181, please give me a call.

RAW:cs

Enclosures

cc: Alice Dolezal

Amendment to Rule MHD 181

Relating to Ionizing Radiation

MHD 181-186 contained in Chapter Twenty-One of the rules of the Minnesota State Department of Health is hereby transferred to Chapter Twelve.

MHD 181 (b), Definitions, is amended by adding the following definitions:

Commissioner - The Commissioner of the Minnesota Department of Health.

Screening - The testing with x-ray machines of human beings or human population groups for the detection or evaluation of health conditions when such x-ray tests are not specifically and individually ordered by a licensed healing arts practitioner, legally authorized to order such x-ray tests, 1) for the purpose of diagnosis or treatment or 2) as part of a physical examination conducted by a licensed practitioner. Screening does not include research protocols utilizing x-ray procedures when such protocols are part of research projects 1) sponsored or financed by agencies of the federal government, 2) conducted by educational institutions training practitioners of the healing arts or 3) conducted in hospitals, when such research is authorized by or under control of the governing body of that hospital.

MHD 181 (h)(1), Prohibitions, is amended by adding subparagraph d. as follows:

d. The use of x-ray machines for the purpose of screening is prohibited without prior written approval of the Commissioner.

MHD 181 (h) is amended by changing the present subparagraph designation of MHD 181 (h)(2), Violations, to MHD 181 H.5. and by adding subparagraphs MHD 181 H.2., 3. and 4. as follows:

2. Commissioner Approval of Screening. Any person desiring Commissioner approval for screening purposes as specified in MHD 181 (h)(1)d. shall submit an application to the Commissioner requesting his permission to perform screening. The burden of justifying the requested screening rests on the applicant. Approval will be granted if the Commissioner is satisfied that:

a. The proposed screening is a justified public health measure;

b. The benefit derived from the proposed screening will outweigh the detriment of x-ray exposure; and

c. The x-ray screening will be conducted properly, safely, and legally, i.e., in accordance with all applicable statutes and rules of the State of Minnesota or federal government.

3. Content of Application for Approval of Screening. The application for approval of a screening program must contain the following information and data:

a. Name and Minnesota business address.

(1) If the applicant is a corporation or other business or non-business association, the name of the person representing the association shall be given.

(2) If the applicant's principal location or home office is not in Minnesota, the principal location or home office address shall be given as well as the name of the person who may be contacted by the Commissioner with respect to the application.

(3) If the applicant is a foreign corporation subject to the provisions of Minnesota Statute Chapter 303 it shall submit a certified copy of its Certificate of Authority issued by the Minnesota Secretary of State. The certification shall be dated no more than one month prior to the date of submission of the application to the Commissioner.

b. When and where the proposed screening is to be performed.

c. Description of the specific screening proposed.

d. Description of the age distribution of the population to be screened.

e. The amount of x-ray exposure to which individuals will be subjected by the proposed screening.

(1) Applications for screening for pulmonary (lung) conditions shall not be approved if the incident (skin entrance) x-ray exposure will exceed 50 milliroentgens per radiograph for the posterior-anterior (PA) view. Using normally accepted exposure techniques, a Victoreen R-chamber placed at a distance of 11 inches from the center of the film with a scatter phantom (Alderson "Rando" phantom or equivalent" positioned in front of the center of the film, or an equivalent method, shall be the method used for measuring the incident (skin entrance) exposure.

(2) Commonly accepted state-of-the-art techniques and equipment shall be the methods used for measuring x-ray exposure from other types of screening. A written description of the specific method used shall be submitted to the Commissioner. The amount of x-ray exposure shall be specified as skin entrance or film exposure and shall not exceed amounts normally given during such projections based on the studies "Population Exposure to X-Rays U.S. 1970" (DHEW Publication (FDA) 73-8047, November 1973)[1] and "National Evaluation of X-Ray Trends: Tabulation of Data for 'All States' for Period January 1, 1974 to December 31, 1974".[2]

f. Why the screening is being planned. A detailed statement shall specify the compelling health reasons, health benefits, or health emergency which justifies the radiation exposure to which individuals will be subjected by the proposed screening.

g. Who will interpret the x-ray film and to whom will the results, interpretation, or findings be sent.

1. The estimated mean exposure per film by type of radiographic examination specified in this publication is reproduced in Appendix A.
2. The weighted mean indexes by type of exam/projection specified in this publication are reproduced in Appendix B.

h. Where the x-ray film will be filed.

i. Who will have access to the x-ray film.

j. If the persons screened will not be given the x-ray film or will not be personally informed by the applicant of the results, interpretation or findings.

(1) How will this information be communicated to those individuals who have been screened.

(2) What arrangements will be made to assure that those persons who have been screened will be informed as to the need for further medical and health care evaluation or treatment.

k. Why alternate screening methods, not requiring use of x-ray machines, are not acceptable.

l. Who will conduct the screening (operators) and their qualifications, with complete information pertaining to the operators including their formal training and specifically describing any licenses, registration or other authority held from Minnesota or other state or federal agencies or professional associations.

m. Who will supervise the operators conducting the screening, with complete information pertaining to the supervisor's qualifications and specifically describing any licenses, registration or other authority held from Minnesota or other state or federal agencies or professional associations. The method of supervision shall be specified.

n. What equipment will be used in connection with the screening, and whether it complies with Minnesota law and regulations and whether such equipment has been inspected, licensed or approved in any other way by a Minnesota agency, or by any other state or federal agency.

o. Any other information requested by the Commissioner which he deems necessary

to enable him to determine whether or not the proposed x-ray exposure the subjects of the screening will receive is a justified public health measure, the benefit of which outweighs the potential detriment of x-ray exposure. The Commissioner may request the submission of additional information and data subsequent to the submission of the original application. The Commissioner may deny approval of any request to perform screening as specified in MHD 181 (h)(1)d. if the applicant fails to or refuses to submit all requested data.

4. Approval of Changes in Screening Program. It is the responsibility of the applicant to inform the Commissioner of any changes in its screening program from that which is described in the application and receive Commissioner approval of such changes prior to commencement of the screening program.

MHD 181 H.5., Violations, is amended as follows:

5. Violations.

a. General.[3] If in the opinion of the Commissioner, it is necessary to do so to protect persons from hazards of radiation, an injunction or other court order may be obtained prohibiting any violation of any provision of any regulation or order issued thereunder. Any person who willfully violates any provision of any regulation or order issued thereunder may be guilty of a crime, and, upon conviction, may be punished by fine or imprisonment or both, as provided by law.

b. Commissioner Approved Screening.

(1) The Commissioner or his representative may inspect the screening program while in progress to assure that it is being carried out as described in the

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3. This subsection (i.e., MHD 181 H.5.a.) already exists in the rules and is not being amended except by being designated as subparagraph "a. General".

application and in compliance with Minnesota Rules MHD 181-186 relating to ionizing radiation.

(2) Approval may be withdrawn immediately if after an inspection the Commissioner finds the existence of conditions which would result in serious overexposure. All screening procedures shall be terminated immediately upon receipt of the written notice of existence of such overexposure. The applicant may request a contested case hearing within five days after receipt of the notice, provided, however, the request for hearing does not stay the Commissioner's order of immediate cessation of the screening program. The hearing shall be scheduled within ten days of receipt of the request for the hearing.

(3) Approval may be withdrawn if after an inspection the Commissioner finds discrepancies between the screening program as implemented and as described in the application or for violation of Minnesota Rules MHD 181-186 relating to ionizing radiation. A hearing shall be held if requested by the applicant within three days after the receipt of the notice of withdrawal of approval. The hearing may be held upon granting the applicant three days notice. If a hearing is requested, withdrawal of approval shall not take effect until a final order is issued by the Commissioner.

Appendix A

Population Exposure to X-Rays U.S. 1970

Estimated mean exposure per film by type of radiographic examination

Type of Examination	Milliroentgens (at skin entrance)
Head and neck	300
skull	330
cervical spine	240
examinations of head and neck, n.e.c.	330
Thorax	---
chest, photofluorographic	---
chest, radiographic	44
shoulder	260
thoracic spine and cervical spine	980
exams of chest or thorax, n.e.c.	1,520
Abdomen	960
Upper abdomen	960
cholecystography or cholangiogram	620
lumbar spine or dorsolumbar spine	1,920
upper gastrointestinal series	710
gastrointestinal, n.e.c.	920
upper abdomen, n.e.c.	1,240
Lower abdomen	970
barium enema	1,320
abdomen, KUB, flat plate	670
intra or retrograde pyelogram	590
pelvis or lumbo-pelvic	610
lumbosacral or sacral spine	2,180
hip	560
lower abdomen, n.e.c.	850
Extremities	100
Upper extremities	90
hand and/or wrist	100
forearm or elbow	60
upper extremities, n.e.c.	90
Lower extremities	110
ankle	140
foot and toes or heel	120
knee	110
tibia and fibula	40
femur or entire leg	120
lower extremities, n.e.c.	140
More than one body area	500

Appendix B

Nationwide Evaluation of X-Ray Trends

Weighted mean indexes by type of exam/projection

Type of exam/projection	Exposure at skin entrance (mR)
Chest (P/A)	23.0
Skull (Lateral)	276.0
ABD. (KUB) (A/P)	652.9
Retr. Pyelo. (A/P)	847.9
Thor. Spine (A/P)	851.3
Cervical Spine (A/P)	302.9
Lum - Sac Spine (A/P)	888.6
Full Spine (A/P)	306.6
Feet (D/P)	202.5
Dental B.W. Post	506.8
Dental Periapical	698.3
Dental Ceph. (Lateral)	31.8

APPROVED AS TO FORM AND LEGALITY

NOV 04 1977 19

WARREN SPANNAUS, ATTORNEY GENERAL

BY /s/ Michael B. Miller

SPECIAL ASSISTANT ATTORNEY GENERAL

STATE OF MINNESOTA
DEPARTMENT OF STATE
FILED
NOV 4 1977
Joan Anderson Growe
Secretary of State

12:30 p.m.

APPLICATION OF THE PROPOSED AMENDMENT TO REGULATION 181

The proposed amendment of Regulation MHD 181 relating to ionizing radiation is intended to apply to mass x-ray screening of the general population. Patients admitted to a hospital for medical treatment have already submitted themselves to a physician's care. Consequently, chest x-rays administered upon admission to a hospital are not interpreted as screening for purposes of this regulation

ERRATA

Page 2 MHD 181 (h)(2)(ee)(i) should read:

(i) Applications for screening for pulmonary (lung) conditions shall not be approved if the incident (skin entrance) x-ray exposure will exceed 50 milliroentgens per radiograph for the posterior-anterior (PA) view. Using normally accepted exposure techniques, a Victoreen R-chamber placed at a distance of eleven (11) inches from the center of the film with a scatter phantom (Alderson "Rando" phantom or equivalent) positioned in front of the center of the film, or an equivalent method, shall be the method used for measuring the incident (skin entrance) exposure.

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA

STATE BOARD OF HEALTH

In the Matter of Proposed Amendments to MHD 181 Relating to the Limitation of the Use of X-Ray Machines in Screening for the Detection and Evaluation of Health Conditions

ORDER FOR HEARING

To effectively implement Minn. Stat. § 144.12 (1974), the Minnesota State Board of Health deems it necessary to consider adoption of the proposed amendment captioned above pursuant to the authority vested in it by the above-referenced statute.

NOW, THEREFORE, IT IS ORDERED this 9th day of September, 1975, that a public hearing on the proposed rules captioned above be held in the Board Room, Minnesota Health Department Building, 717 Delaware Street S.E., Minneapolis, Minnesota, on October 24, 1975, commencing at 9:00 A.M., and continuing until all representatives of associations or other interested groups or persons have had an opportunity to be heard.

IT IS FURTHER ORDERED that notice of said hearing be given to all representatives of associations or other interested groups or persons who have registered their names with the Secretary of State for that purpose and all persons who are presently members of the Minnesota Legislature.

STATE OF MINNESOTA

BOARD OF HEALTH

WARREN R. LAWSON, M.D.
Secretary and Executive Officer

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA

STATE BOARD OF HEALTH

In the Matter of Proposed Amendments to MHD 181 Relating to the Limitation of the Use of X-Ray Machines in Screening for the Detection and Evaluation of Health Conditions

NOTICE OF HEARING

Notice is hereby given that a public hearing will be held pursuant to Minn. Stat. § 15.0412 subd. 4 (1974), as amended by Minn. Laws 1975, ch. 380, in the above-entitled matter, in the Board Room, Minnesota Department of Health Building, 717 Delaware Street S.E., Minneapolis, Minnesota, on October 24, 1975, commencing at 9:00 A.M., and continuing until all representatives or other interested groups of persons have had an opportunity to be heard concerning adoption of the proposed amendment captioned above by submitting either oral or written data, statements, or arguments. Statements or briefs may be submitted without appearing at the hearing.

Under Minn. Stat. § 10A.01 subd. 11 (1974), any individual representing persons or associations attempting to influence administrative action, such as promulgation of these proposed amendments, must register with the State Ethics Commission as a lobbyist within five days of the commencement of such activity by the individual. The State Ethics Commission is located at 410 State Office Building, St. Paul, Minnesota 55155.

The Minnesota State Board of Health proposes to amend Minn. Rule MHD 181 (b), Definitions, and MHD 181 (h), Restrictions. The proposed amendments are attached hereto

and made a part hereof. Additional copies of the proposed amendments are now available and may be obtained by writing to the Minnesota Department of Health, Division of Environmental Health, Radiation Control Section, ATTN: Alice Dolezal, 717 Delaware Street S.E., Minneapolis, Minnesota 55440. Additional copies will be available at the door on the date of the hearing.

The proposed rules in MHD 181 (h)(2)(ee)(ii) adopt by reference two studies of the U.S. Department of Health, Education and Welfare entitled, "Population Exposure to X-Rays U.S. 1970" (DHEW Publication (FDA) 73-8047, November 1973) and "National Evaluation of X-Ray Trends: Tabulation of Data for 'All States' for Period January 1, 1974 to December 31, 1974." These studies are available for review at the Minnesota Department of Health Building, address as above, or may be obtained by writing to:

Public Information Officer HFX-25
Department of Health, Education & Welfare
Public Health Service
Food and Drug Administration
Bureau of Radiological Health
5600 Fisher Lane
Rockville, Maryland 20852

A copy of the procedural rules for the hearing is attached and made a part hereof.

Testimony or other evidence to be submitted for consideration should be pertinent to the matter at hand and may be presented either orally or in writing at the public hearing or by mailing a statement to the Secretary and Executive Officer of the Board at the Department of Health Building, address as above. If the person submitting a statement cannot be present to read his statement at the time of the hearing, the statement will be entered into the record. For those wishing to submit written statements or exhibits, it is requested that at least three (3) copies of such statement, exhibit or summary be furnished at the

hearing. The record will remain open for receipt of briefs or other written material relative to the proposed rules for twenty (20) days subsequent to the public hearing.

It is suggested that to save time and avoid duplication, those organizations or associations having a common viewpoint or interest in these proceedings join together where possible and present a single statement in behalf of such interests.

Dated: September 9th, 1975.

STATE OF MINNESOTA

BOARD OF HEALTH

WARREN R. LAWSON, M.D.
Secretary and Executive Officer

MINNESOTA STATE BOARD OF HEALTH

PROCEDURAL RULES FOR HEARING

The purpose of the hearing is to allow interested parties to express their views and present facts bearing upon the proposed regulations. So as to provide for an orderly presentation of evidence, the following rules will be in effect during the hearing specified in the attached Notice of Hearing:

1. Anyone wishing to be heard should indicate by signing the speaking sheet, listing his name, address, and the group which he represents. The speaking sheet will be available at the main entrance to the hearing room. It is requested that each group select one speaker only to present its views.

2. The first time the witness makes a statement he should spell his name and identify the group he is representing. Prior to making any subsequent statements he should state his name and the group which he represents. He may be sworn upon his request but it is not required. If he elects not to be sworn, that may be considered in determining the weight to be given to his testimony.

3. By giving testimony, a witness, including one who may also be a member of the panel, subjects himself to questioning by the panel. However, he is subject to cross-examination by non-members of the panel only if he affirmatively consents to being so examined. A refusal to be cross-examined may be considered in determining the weight to be given to his testimony.

4. All parties interested in introducing any written matter may do so by having it marked as an exhibit and then introduced for the record. Unsworn written matter may be received, but the fact that it is unsworn may be considered in determining the weight to be given it.

CERTIFICATE OF BOARD OF HEALTH'S

AUTHORIZING RESOLUTION

I, Warren R. Lawson, M.D., do hereby certify that I am presently the Commissioner of Health and formerly the Secretary and Executive Officer of the Minnesota State Board of Health, a board duly authorized under the laws of the State of Minnesota until it was abolished and all of its powers and duties transferred to the Commissioner of Health effective May 28, 1977, pursuant to Minn. Laws 1977, ch. 305, §§ 39, 44, 45, and 47, and that the following is a true, complete, and correct copy of a resolution adopted at a meeting of the said Board duly and properly called and held on the 8th day of August, 1974, that a quorum was present at said meeting; that a majority of those present voted for the resolution; that said resolution is set forth in the minutes of said meeting and has not been rescinded or modified.

> RESOLVED, that Warren R. Lawson, M.D., Secretary and Executive Officer of the Minnesota State Board of Health, be and he hereby is granted the authority and directed to call a hearing for the purpose of amending regulation MHD 181 of the Board of Health, such amendment relating to limiting or prohibiting the use of x-ray machines for screening of human beings for pulmonary health conditions, setting maximum x-ray exposure limits, and the transfer of x-ray records, as well as perform any and all acts incidental thereto, including but without being limited thereto, signing an order for hearing and notice of hearing as well as acting as or appointing a presiding officer for all hearings.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 19th day of September, 1977.

STATE OF MINNESOTA

DEPARTMENT OF HEALTH

Warren R. Lawson

WARREN R. LAWSON, M.D.
Commissioner of Health

Amendment to Rule MHD 181

Relating to Ionizing Radiation

MHD 181-186 contained in Chapter Twenty-One of the rules of the Minnesota State Department of Health is hereby transferred to Chapter Twelve.

MHD 181 (b), Definitions, is amended by adding the following definitions:

Commissioner - The Commissioner of the Minnesota Department of Health.

Screening - The testing with x-ray machines of human beings or human population groups for the detection or evaluation of health conditions when such x-ray tests are not specifically and individually ordered by a licensed healing arts practitioner, legally authorized to order such x-ray tests, 1) for the purpose of diagnosis or treatment or 2) as part of a physical examination conducted by a licensed practitioner. Screening does not include research protocols utilizing x-ray procedures when such protocols are part of research projects 1) sponsored or financed by agencies of the federal government, 2) conducted by educational institutions training practitioners of the healing arts or 3) conducted in hospitals, when such research is authorized by or under control of the governing body of that hospital.

MHD 181 (h)(1), Prohibitions, is amended by adding subparagraph d. as follows:

d. The use of x-ray machines for the purpose of screening is prohibited without prior written approval of the Commissioner.

MHD 181 (h) is amended by changing the present subparagraph designation of MHD 181 (h)(2), Violations, to MHD 181 H.5. and by adding subparagraphs MHD 181 H.2., 3. and 4. as follows:

2. Commissioner Approval of Screening. Any person desiring Commissioner approval for screening purposes as specified in MHD 181 (h)(1)d. shall submit an application to the Commissioner requesting his permission to perform screening. The burden of justifying the requested screening rests on the applicant. Approval will be granted if the Commissioner is satisfied that:

a. The proposed screening is a justified public health measure;

b. The benefit derived from the proposed screening will outweigh the detriment of x-ray exposure; and

c. The x-ray screening will be conducted properly, safely, and legally, i.e., in accordance with all applicable statutes and rules of the State of Minnesota or federal government.

3. Content of Application for Approval of Screening. The application for approval of a screening program must contain the following information and data:

a. Name and Minnesota business address.

(1) If the applicant is a corporation or other business or non-business association, the name of the person representing the association shall be given.

(2) If the applicant's principal location or home office is not in Minnesota, the principal location or home office address shall be given as well as the name of the person who may be contacted by the Commissioner with respect to the application.

(3) If the applicant is a foreign corporation subject to the provisions of Minnesota Statute Chapter 303 it shall submit a certified copy of its Certificate of Authority issued by the Minnesota Secretary of State. The certification shall be dated no more than one month prior to the date of submission of the application to the Commissioner.

b. When and where the proposed screening is to be performed.

c. Description of the specific screening proposed.

d. Description of the age distribution of the population to be screened.

e. The amount of x-ray exposure to which individuals will be subjected by the proposed screening.

(1) Applications for screening for pulmonary (lung) conditions shall not be approved if the incident (skin entrance) x-ray exposure will exceed 50 milliroentgens per radiograph for the posterior-anterior (PA) view. Using normally accepted exposure techniques, a Victoreen R-chamber placed at a distance of 11 inches from the center of the film with a scatter phantom (Alderson "Rando" phantom or equivalent" positioned in front of the center of the film, or an equivalent method, shall be the method used for measuring the incident (skin entrance) exposure.

(2) Commonly accepted state-of-the-art techniques and equipment shall be the methods used for measuring x-ray exposure from other types of screening. A written description of the specific method used shall be submitted to the Commissioner. The amount of x-ray exposure shall be specified as skin entrance or film exposure and shall not exceed amounts normally given during such projections based on the studies "Population Exposure to X-Rays U.S. 1970" (DHEW Publication (FDA) 73-8047, November 1973) and "National Evaluation of X-Ray Trends: Tabulation of Data for 'All States' for Period January 1, 1974 to December 31, 1974".

f. Why the screening is being planned. A detailed statement shall specify the compelling health reasons, health benefits, or health emergency which justifies the radiation exposure to which individuals will be subjected by the proposed screening.

g. Who will interpret the x-ray film and to whom will the results, interpretation, or findings be sent.

h. Where the x-ray film will be filed.

i. Who will have access to the x-ray film.

j. If the persons screened will not be given the x-ray film or will not be personally informed by the applicant of the results, interpretation or findings:

(1) How will this information be communicated to those individuals who have been screened, and

(2) What arrangements will be made to assure that those persons who have been screened will be informed as to the need for further medical and health care evaluation or treatment.

k. Why alternate screening methods, not requiring use of x-ray machines, are not acceptable.

l. Who will conduct the screening (operators) and their qualifications, with complete information pertaining to the operators including their formal training and specifically describing any licenses, registration or other authority held from Minnesota or other state or federal agencies or professional associations.

m. Who will supervise the operators conducting the screening, with complete information pertaining to the supervisor's qualifications and specifically describing any licenses, registration or other authority held from Minnesota or other state or federal agencies or professional associations. The method of supervision shall be specified.

n. What equipment will be used in connection with the screening, and whether it complies with Minnesota law and regulations and whether such equipment has been inspected, licensed or approved in any other way by a Minnesota agency, or by any other state or federal agency.

o. Any other information requested by the Commissioner which he deems necessary

to enable him to determine whether or not the proposed x-ray exposure the subjects of the screening will receive is a justified public health measure, the benefit of which outweighs the potential detriment of x-ray exposure. The Commissioner may request the submission of additional information and data subsequent to the submission of the original application. The Commissioner may deny approval of any request to perform screening as specified in MHD 181 (h)(1)d. if the applicant fails to or refuses to submit all requested data.

4. Approval of Changes in Screening Program. It is the responsibility of the applicant to inform the Commissioner of any changes in its screening program from that which is described in the application and receive Commissioner approval of the changes prior to their implementation.

MHD 181 H.5., Violations, is amended as follows:

5. Violations.

a. General.* If in the opinion of the Commissioner, it is necessary to do so to protect persons from hazards of radiation, an injunction or other court order may be obtained prohibiting any violation of any provision of any regulation or order issued thereunder. Any person who willfully violates any provision of any regulation or order issued thereunder may be guilty of a crime, and, upon conviction, may be punished by fine or imprisonment or both, as provided by law.

b. Commissioner Approved Screening.

(1) The Commissioner or his representative may inspect the screening program while in progress to assure that it is being carried out as described in the

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*This subsection (i.e., MHD 181 H.5.a.) already exists in the rules and is not being amended except by being designated as subparagraph "a. General".

application and in compliance with Minnesota Rules MHD 181-186 relating to ionizing radiation.

(2) Approval may be withdrawn immediately if after an inspection the Commissioner finds the existence of conditions which would result in serious overexposure. All screening procedures shall be terminated immediately upon receipt of the written notice of existence of such overexposure. The applicant may request a contested case hearing within five days after receipt of the notice, provided, however, the request for hearing does not stay the Commissioner's order of immediate cessation of the screening program. The hearing shall be scheduled within ten days of receipt of the request for the hearing.

(3) Approval may be withdrawn if after an inspection the Commissioner finds discrepancies between the screening program as implemented and as described in the application or for violation of Minnesota Rules MHD 181-186 relating to ionizing radiation. A hearing shall be held if requested by the applicant within three days after the receipt of the notice of withdrawal of approval. The hearing may be held upon granting the applicant three days notice. If a hearing is requested, withdrawal of approval shall not take effect until a final order is issued by the Commissioner.

Proposed Amendment to Regulation MHD 181
Relating to Ionizing Radiation

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MHD 181 (b), Definitions, is amended by adding the following definition:

Screening - The testing with x-ray machines of human beings or human population groups for the detection or evaluation of health conditions when such x-ray tests are not specifically and individually ordered by a licensed healing arts practitioner, legally authorized to order such x-ray tests, for the purpose of diagnosis or treatment or as part of a physical examination conducted by a licensed practitioner.

MHD 181 (h)(1), Prohibitions, is amended by adding subparagraph (dd) as follows:

(dd) The use of x-ray machines for the purpose of screening is prohibited without prior written approval of the Board or its Secretary and Executive Officer.

MHD 181 (h) is amended by changing the present paragraph designation of MHD 181 (h)(2), Violations, to MHD 181 (h)(3) and by adding a new paragraph MHD 181 (h)(2), as follows:

(2) Board Approval of Screening. Any person desiring Board approval for screening purposes as specified in MHD 181 (h)(1)(dd) shall submit an application to the Board requesting its permission to perform screening. The burden of justifying the requested screening rests on the applicant. Approval will be granted if the Board or its Secretary and Executive Officer is satisfied, based upon the information submitted by the applicant and the information, advice and recommendation of the staff of the Minnesota Department of Health, that the proposed screening is a justified public health measure and that the benefit derived from the proposed screening will outweigh the detriment of x-ray exposure. It is the responsibility of the applicant to inform the Board of any changes in its screening program from that which is described in the application and receive Board approval of such changes prior to commencement of the screening program. The application must contain the following information and data:

(aa) Name and Minnesota business address.

(i) If the applicant is a corporation or other business or non-business association, the name of the person representing the association shall be given.

(ii) If the applicant's principal location or home office is not in Minnesota, the principal location or home office address shall be given as well as the name of the person who may be contacted by the Board with respect to the application.

(iii) If the applicant is a foreign corporation subject to the provisions of Minnesota Statute Chapter 303 it shall submit a certified copy of its Certificate of Authority issued by the Minnesota Secretary of State. The certification shall be dated no more than one month prior to the date of submission of the application

to the Board.

(bb) When and where the proposed screening is to be performed.

(cc) Description of the specific screening proposed.

(dd) Description of the age distribution of the population to be screened.

(ee) The amount of x-ray exposure to which individuals will be subjected by the proposed screening.

(i) Applications for screening for pulmonary (lung) conditions shall not be approved if the incident (skin entrance) x-ray exposure will exceed 50 milliroentgens per radiography for the posterior-anterior (PA) view. Using normally accepted exposure techniques, a Victoreen R-chamber placed at a distance of eleven (11) inches from the center of the film with a scatter phantom (Alderson "Rando" phantom or equivalent) positioned in front of the center of the film, or an equivalent method, shall be the method used for measuring the incident (skin entrance) exposure.

(ii) Commonly accepted state-of-the-art techniques and equipment shall be the methods used for measuring x-ray exposure from other types of screening. A written description of the specific method used shall be submitted to the Board. The amount of x-ray exposure shall be specified as skin entrance or film exposure and shall not exceed amounts normally given during such projections based on the nationally accepted studies of the U.S. Department of Health, Education and Welfare studies "Population Exposure to X-Rays U.S. 1970" (DHEW Publication (FDA) 73-8047, November 1973) and "National Evaluation of X-Ray Trends: Tabulation of Data for 'All States' for Period January 1, 1974 to December 31, 1974".

(ff) Why the screening is being planned. A detailed statement shall specify the compelling health reasons, health benefits, or health emergency which justifies the radiation exposure to which individuals will be subjected by the proposed screening.

(gg) Who will interpret the x-ray film and to whom will the results, interpretation, and findings be sent.

(hh) Where the x-ray film will be filed.

(ii) Who will have access to the x-ray film.

(jj) If the persons screened will not be given the x-ray film or will not be personally informed of the results, interpretation and findings by the applicant:

(i) What will be communicated to those individuals who have been screened.

(ii) What arrangements will be made to assure that those persons who have been screened will be informed as to the need for further medical and health care evaluation or treatment.

(kk) Why alternate screening methods, not requiring use of x-ray machines are not acceptable.

(ll) Any other information requested by the Board which it deems necessary to enable it to determine whether or not the proposed x-ray exposure the subjects of the screening will receive is a justified public health measure, the benefit of which outweighs the detriment of x-ray exposure. The Board may request the

submission of additional information and data subsequent to the submission of the original application. The Board may deny approval of any request to perform screening as specified in MHD 181 (h)(1)(dd) if the applicant fails to or refuses to submit all requested data.

MHD 181 (h)(3), Violations, is amended as follows:

(3) Violations.

(aa) General.* If in the opinion of the Board, it is necessary to do so to protect persons from hazards of radiation, an injunction or other court order may be obtained prohibiting any violation of any provision of any regulation or order issued thereunder. Any person who willfully violates any provision of any regulation or order issued thereunder may be guilty of a crime, and, upon conviction, may be punished by fine or imprisonment or both, as provided by law.

(bb) Board Approved Screening.

(i) The Board or its representative may inspect the screening program while in progress to assure that it is being carried out as described in the application and that Minnesota Rules MHD 181-186 relating to ionizing radiation are not being violated.

(ii) Approval may be withdrawn immediately if findings of the Board after an inspection indicate existence of a serious radiation hazard jeopardizing the health of persons in the vicinity of the screening program. All screening procedures shall be terminated immediately, upon receipt of the written notice of existence of a serious radiation hazard. The applicant may request a contested case hearing within five days after receipt of the notice, provided, however, the request for a hearing does not stay the Board's order of immediate cessation of the screening program. The hearing shall be scheduled within ten days of receipt of the request for the hearing.

(iii) Approval may be withdrawn if findings of the Board after an inspection indicate discrepancies between the screening program as implemented and as described in the application or for violation of Minnesota Rules MHD 181-186 relating to ionizing radiation. A hearing may be held if requested by the applicant within three days after the receipt of the notice of withdrawal of approval. The hearing may be held upon granting the applicant three days notice. If a hearing is requested, withdrawal of approval shall not take effect until a final order is issued by the Board.

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*This section already exists in the rules and is not being amended except by being designated as subparagraph "(aa) General".

STATE OF MINNESOTA

COUNTY OF HENNEPIN

In the Matter of Proposed Amendments to MHD 181 Relating to the Limitation of the Use of X-Ray Machines in Screening for the Detection and Evaluation of Health Conditions

AFFIDAVIT OF MAILING

Gerald F. Wambach, being first duly sworn, deposes and says:

That on the 12th day of September, 1975, at the City of Minneapolis, County of Hennepin, State of Minnesota, he served the attached Notice of Hearing by depositing in the United States mail at said City of Minneapolis, a true and correct copy thereof, properly enveloped, with postage prepaid, to all persons and associations at the addresses listed on the Certificate of the Secretary of State, attached and made a part hereof as Exhibit A, to all persons and associations at the addresses listed on Exhibit B, attached and made a part hereof, as well as to all members of the Minnesota Legislature as of the date of mailing.

Gerald F. Wambach

Subscribed and sworn to before me this 12th day of September, 1975.

Christine A. Kuderka

CHRISTINE A. KUDERKA
Notary Public, Ramsey County, Mn.
My Commission Expires, Nov. 4, 1978

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA

STATE BOARD OF HEALTH

In the Matter of Proposed Amendments to MHD 181 Relating to the Limitation of the Use of X-Ray Machines in Screening for the Detection and Evaluation of Health Conditions

NOTICE OF HEARING

Notice is hereby given that a public hearing will be held pursuant to Minn. Stat. §§ 15.0412 subd. 4 (1974), as amended by Minn. Laws 1975, ch. 380, in the above-entitled matter, in the Board Room, Minnesota Department of Health Building, 717 Delaware Street S.E., Minneapolis, Minnesota, on October 24, 1975, commencing at 9:00 A.M., and continuing until all representatives or other interested groups of persons have had an opportunity to be heard concerning adoption of the proposed amendment captioned above by submitting either oral or written data, statements, or arguments. Statements or briefs may be submitted without appearing at the hearing.

Under Minn. Stat. §§ 10A.01 subd. 11 (1974), any individual representing persons or associations attempting to influence administrative action, such as promulgation of these proposed amendments, must register with the State Ethics Commission as a lobbyist within five days of the commencement of such activity by the individual. The State Ethics Commission is located at 410 State Office Building, St. Paul, Minnesota 55155.

The Minnesota State Board of Health proposes to amend Minn. Rule MHD 181 (b), Definitions, and MHD 181 (h), Restrictions. The proposed amendments are attached hereto and made a part hereof. Additional copies of the proposed amendments are now available and may be obtained by writing to the Minnesota Department of Health, Division of Environmental Health, Radiation Control Section, ATTN: Alice Dolezal, 717 Delaware Street S.E., Minneapolis, Minnesota 55440. Additional copies will be available at the door on the date of the hearing.

The proposed rules in MHD 181 (h)(2)(ee)(ii) adopt by reference two studies of the U.S. Department of Health, Education and Welfare entitled "Population Exposure to X-Rays U.S. 1970" (DHEW Publication (FDA) 73-8047, November 1973) and "National Evaluation of X-Ray Trends: Tabulation of Data for 'All States' for Period January 1, 1974 to December 31, 1974". These studies are available for review at the Minnesota Department of Health Building, address as above, or may be obtained by writing to: Public Information Officer HFX-25, Department of Health, Education and Welfare, Public Health Service, Food and Drug Administration, Bureau of Radiological Health, 5600 Fishers Lane, Rockville, Maryland 20852.

A copy of the procedural rules for the hearing is attached and made a part hereof.

Testimony or other evidence to be submitted for consideration should be pertinent to the matter at hand and may be presented either orally or in writing at the public hearing or by mailing a statement to the Secretary and Executive Officer of the Board at the Department of Health Building, address as above. If the person submitting a statement cannot be present to read his statement at the time of the

hearing, the statement will be entered into the record. For those wishing to submit written statements or exhibits, it is requested that at least three (3) copies of such statement, exhibit or summary be furnished at the hearing. The record will remain open for receipt of briefs or other written material relative to the proposed rules for twenty (20) days subsequent to the public hearing.

It is suggested that to save time and avoid duplication, those organizations or associations having a common viewpoint or interest in these proceedings join together where possible and present a single statement in behalf of such interests.

Dated: September 12, 1975

STATE OF MINNESOTA

BOARD OF HEALTH

/S/ WARREN R. LAWSON, M.D.
WARREN R. LAWSON, M.D.
Secretary and Executive Officer

MINNESOTA STATE BOARD OF HEALTH

PROCEDURAL RULES FOR HEARING

The purpose of the hearing is to allow interested parties to express their views and present facts bearing upon the proposed regulations. So as to provide for an orderly presentation of evidence, the following rules will be in effect during the hearing specified in the attached Notice of Hearing:

1. Anyone wishing to be heard should indicate by signing the speaking sheet, listing his name, address, and the group which he represents. The speaking sheet will be available at the main entrance to the hearing room. It is requested that each group select one speaker only to present its views.

2. The first time the witness makes a statement he should spell his name and identify the group he is representing. Prior to making any subsequent statements he should state his name and group which he represents. He may be sworn upon his request but it is not required. If he elects not to be sworn, that may be considered in determining the weight to be given to his testimony.

3. By giving testimony, a witness, including one who may also be a member of the panel, subjects himself to questioning by the panel. However, he is subject to cross-examination by non members of the panel only if he affirmatively consents to being so examined. A refusal to be cross-examined may be considered in determining the weight to be given to his testimony.

4. All parties interested in introducing any written matter may do so by having it marked as an exhibit and then introduced for the record. Unsworn written matter may be received, but the fact that it is unsworn may be considered in determining the weight to be given it.

Exhibit A

STATE OF MINNESOTA

COUNTY OF RAMSEY

In the Matter of Proposed Amendments to MHD 181 Relating to the Limitation of the Use of X-Ray Machines in Screening for the Detection and Evaluation of Health Conditions

CERTIFICATE

I hereby certify that the 437 general labels and list for the Minnesota State Health Department consisting of one page, all of which are attached and made a part hereof, constitute the complete lists of persons, associations, and other interested groups who as of 9:00 o'clock A.M., this 11th day of September, 1975, have requested pursuant to Minn. Stat. § 15.0412 subd. 4 (1974), as amended by Minn. Laws 1975, ch. 380, that their names be placed on file with the Secretary of State for the purpose of receiving notice of public hearing on proposed rules on the subject captioned above.

Joan Anderson Growe
SECRETARY OF STATE

JOAN ANDERSON GROWE

By Gerl Dion

RADMAN RICHARD-LABOR TEMPLE
418 AUDITORIUM
ST PAUL MN
55102

RANALLO CLARENCE
800 CENTRAL AVE N E
MPLS MN
55413

RAUENHORST CORP-C ANDERSON
7900 XERXES S. S-2200
MPLS MN
55431

RED OWL STORES INC
215 E EXCELSIOR AVE
HOPKINS MN
55343

REID DAVID H
5633 WASHBURN AVE S
MPLS MN
55410

RENNER R.H. ST PAUL AREA
300 OSBORN BLDG.
ST PAUL MN
55102

RAMSEY CO MEDICAL SOCIETY
1500 LOWRY MEDICAL BLDG
ST PAUL MN
55102

RICHARDSON THOS
7851 METRO PKWY S 103
MPLS MN
55420

RICHARDS MONTGOMERY ET AL
1430 RAND TOWER
MPLS MN
55402

ROE DAVID
175 AURORA
ST PAUL MN
55103

ROBBIE JOSEPH
904 CARGILL BLDG NO CTR
MPLS MN
55402

ROBERTS DAVID E
1260 NW NATL BK BLDG
ST PAUL MN
55101

ROSS ALFRED
6356 WARE RD
LINO LAKES MN
55014

RUDY FLOYD
118 AVE C
CLOQUET MN
55720

SAN SIMEON DEVELOP CORP
OLD 1ST STATE BK BLDG
PAYNESVILLE MN

SANFORD S M
7000 PORTLAND AVE
RICHFIELD MN
55423

SATHRE, HARVEY
375 MARION STREET
ST PAUL MN
55103

SAX DOVE & STENSON
310 ENDICOTT BLDG
ST PAUL MN
55101

ST PAUL ASSN PLBG HTG MECH
614 AM NATL BK
ST PAUL MN

ST PAUL BUR HLTH DR P COX
555 CEDAR ST
ST PAUL MN
55101

ST PAUL FOOD RETAILERS AS
1220 ARCADE
ST PAUL MN
55106

SCARBOROUGH WILLIAM
DIV.ED. J.M.
MORRIS MN
56267

SCHLICHT REV ROBT
611 W MAIN ST
BELLE PLAINE MN
56011

SCHMIDT D R MN ASSN REALTORS
6101 WAYZATA BLVD
MPLS MN
55416

SCHMIDT H W TCHRS RETIREM
302 CAPITOL SQ BLDG
ST PAUL MN
55101

SCHMIDT LARRY WCCO-TV NEWS
50 S 9TH ST
MPLS MN
55402

SCHNEIDER MAHLON
GREEN GIANT
LESUEUR MN
56058

SCHUTZ LINDA
RM 328 CAPITOL BLDG
ST PAUL MN
55155

SCHWARTAU NEAL METH HOSP
201 W CENTER ST
ROCHESTER MN
55901

SCHWERMAN EARL JR
1535 8TH AVE SE
ROCHESTER MN
55901

SCHWINN ROBT.P.
1400 SOO LINE BLDG.
MPLS. MN
55402

SCHNEIDER & NEESER
706 1ST ST SO PO BX 876
WILLMAR MN
56201

SCHROEDER ALFRED H
2172 CARROLL AVE
ST PAUL MN
55104

SENATE COUN OFF ROOM 24
STATE CAPITOL
ST PAUL MN
55101

SENATE FINANCE COMMITTEE
113 STATE CAPITOL
ST PAUL MN
55101

SENATE GOV OP COMM
RM 303 STATE CAPITOL
ST PAUL MN
55155

SHABATURA EUGENE H
2833 LAKE AVE SO
DULUTH MN
55811

SHARP BOB
4125 HIGHWOOD RD
ST LOUIS PK MN
55416

SHAW ROBERT M
616 MOBIL OIL BLDG
MPLS MN
55402

SHELL OIL CO. W.A. ROQUET
ONE SHELL PLAZA BX 2463
HOUSTON TX
77001

SITE ENGINEERS INC
900 REDWELL LANE
APPLE VALLEY MN
55124

SKELLY OIL CO R R WELLINGTON
PO BOX 436
KANSAS CITY MO

SLOCUM CHARLES A
1203 IDS TOWER
MPLS MN
55402

SMERIKA WM.
BOISE CASCADE PAPERS
INTL FALLS MN
56649

SMITH MICHAEL
1423 NEWTON AVE N
MPLS MN
55411

WHITING RALPH
555 WABASHA SUITE 204
ST PAUL MN
55102

WILEY ENTERPRISES
101 5TH AVE SE
OSSEO MN
55369

WOZNIAK D D
601 FIRST FED BLDG
ST PAUL MN
55101

WHITLOCK A G
ECON LAB OSBORN BLDG
ST PAUL MN
55102

WILSON R GARY PPG INDUSTR
1 GATEWAY CENTER
PITTSBURGH PA
15222

WYANT CLINTON W ATTY

ATKIN MN
56431

WILCOX J PATRICK
1220 NORTHERN FED BLDG
ST PAUL MN
55102

WIS FEEDER PIG MARKET CO-OP

FRANCIS CREEK WI

WM.MITCHEL COLLEGE LAW LI
2100 SUMMIT AVE.
ST.PAUL MN
55105

WOLKERSTORTER THEODORE
676 17TH AVE NW
NEW BRIGHTON MN
55112

NAME	ADDRESS - STREET	CITY	STATE	ZIP CODE
MOFFITT R C	RM 301 M MPLS CITY HALL	MPLS	MN	55415
REINQUIST ARTHUR NSA GQ	4444 NICOLLET MALL	MPLS	MN	55407
BECK BAT	953 HYACINTH AVE	ST PAUL	MN	55108
BROWN H D	4961 KINGSBERRY LANE	MINNETONKA	MN	55343
NEREN MADONNA	376 NEAL AVE S	WAYZATA	MN	55391
REAGAN MICHAEL	C/O MINN LEARNING CTR	BRAINARD	MN	56401
HOUSE RESEARCH	RM 57 STATE CAPITOL	ST PAUL	MN	55155
PORTER DAVID	3212 LONGFELLOW AVE S	MPLS	MN	55407

SKELLY OIL CO R R WELLINGTON
PO BOX 436
KANSAS CITY MO

SLOCUM CHARLES A
1203 IDS TOWER
MPLS MN
55402

SMERIKA WN.
BOISE CASCADE PAPERS
INTL FALLS MN
56649

SMITH MICHAEL
1423 NEWTON AVE N
MPLS MN
55411

SNELL LYN
BOX 314
EDEN VALLEY MN
55329

SNYDER ROBERT W
248 CO B U OF M
ST PAUL MN
55101

SODERBERG HAROLD J
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

SODERMAN ANTHONY
152 S PLAZA BLDG
MPLS MN
55416

STANSFIELD ARLENE LAND OLKS
PO BOX 116
MPLS MN
55440

STATE BD.BARBER EXAMINERS
555 WABASHA
ST PAUL MN
55102

STATE BD VETERINARY EXAMINER
C/O DR A C SPANNAUS DVM
WACONIA MN

STD AM LIFE & ANNUITY CO
3801 W 50TH ST
MPLS MN
55410

STEELWORKERS CREDIT UNION
BOX 250
BABBITT MN
55706

STENSLAND M.E. PRES. MVMA
203 NW 22ND ST.
AUSTIN MN
55912

STOLPESTAD BROWN & SMITH
1550 NW BK BLDG
ST PAUL MN
55101

STUPKA & MOREM
MIDTOWN BLDG
AUSTIN MN
55912

SULLIVAN J KIRK
PO BOX 200
BOISE ID
83701

SUMMIT NATL BANK D L MORRILL
205 AURORA AVE
ST PAUL MN
55103

SUSSEL CO.ATTN:TED SCHWENKER
1850 COMO AVE.
ST PAUL MN
55108

SWANSON BURT E
W-2162 1ST NATL BK BLDG
ST PAUL MN
55101

SWANSON DALE
P O BOX 339
FOREST LAKE MN
55025

SWANSON GERALD H
212 CITY HALL
ROCHESTER MN
55901

SWEITZER R L HONEYWELL INC
2701 4TH AVE S
MPLS MN
55408

TATE VERN 3M CO
3M CENTER 220/6W
ST PAUL MN
55101

THOMPSON CONRAD
1107 23RD ST NW
ROCHESTER MN
55901

THOMPSON HESSIAN ET AL
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

TIMESAVERS INC ATT R S VO
5270 HANSON COURT
MPLS MN
55422

TOUCHE ROSS & CO K H STOCKE
780 NORTHSTAR CNTR
MPLS MN
55402

TWIN CITY RETAIL DRUGGIST AS
2388 UNIV AVE
ST PAUL MN
55104

UNION STOCK YARDS
ATTN PRES
SO ST PAUL MN
55075

VAN CLEVE JOHN H
2101 HENN AVE
MPLS MN
55405

VAN DRAKE STEPHEN R
BOX 353
PELICAN RAPID MN
56572

VAN EVERA MUNDT ET AL
700 TORREY BLDG
DULUTH MN
55802

VERRILL JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN
55812

VILLAGE OF WOODBURY-F.STRONG
561 TOWER DRIVE
NEWPORT MN
55055

VOLDNESS PERRY
IDS 8TH & MARQUETTE
MPLS MN
55402

VOSS REV GORDON O
11120 NE 7TH ST
BLAINE MN
55434

VOS LEROY
2137 BURNS AVE
ST PAUL MN
55119

WALD JEAN
5746 SANDER DR
MPLS MN
55417

WALIGORA ROBERT
3228 SO 17TH AVE
MPLS MN
55407

WALTERS THOS H
4510 W 77TH ST STE 235
MPLS MN
55435

WANQUIST ALLEN
RM 252 FEDERAL BLDG
ST PAUL MN
55101

WELK G V NORTHERN STATES
414 NICOLLET MALL
MPLS MN
55401

WESTIN CHAS W
220 MEDICAL ARTS BLDG
DULUTH MN
55802

WHITING RALPH
555 WABASHA SUITE 204
ST PAUL MN
55102

WHITLOCK A G
ECON LAB OSBORN BLDG
ST PAUL MN
55102

WILCOX J PATRICK
1220 NORTHERN FED BLDG
ST PAUL MN
55102

WM.MITCHEL COLLEGE LAW LI
2100 SUMMIT AVE.
ST.PAUL MN
55105

MN PUB INT RESEARCH GROUP
3036 UNIV AVE SE
MPLS MN
55414

MOFFITT R.C. DIR.ENV.CONTROL
MPLS.CITY HALL RM 301M
MPLS MN
55415

MOOD R BLOOMINGTON HLTH DEPT
10200 PENN SO
BLOOMINGTON MN
55431

MOONEY, MICHAEL A.
BOX 903, ST.JOHN'S UNIV
COLLEGEVILLE MN
56321

MORTON BUILDINGS INC
R #1
FOLEY MN
56329

MPIRG
BOX 45 ST MARYS COLLEGE
WINONA MN
55987

MUELLER SHIRLEY A
787 W COTTAGE AVE
ST PAUL MN
55117

NASS GEO V HENN CO GEN HOSP
5TH AND PORTLAND AVE
MPLS MN
55415

NATL CAR RENTAL ATT D MITZEL
5501 GREEN VALLEY DR
MPLS MN
55437

NATL COUNCIL JEWISH WOMEN
4330 CEDAR LK RD
MPLS MN
55416

NATL FAMILY INS CO
2147 UNIV AVE
ST PAUL MN
55114

NAT'L SOLID WASTES-R. GRASSO
1730 RHODE ISLAND AV.NW
WASHINGTON DC
20036

NCEC INC C/O DR DAHLBERG
CONCORDIA COLLEGE
MOORHEAD MN
56560

NELSON DONALD E NSP CO
414 NICOLLET AVE
MPLS MN
55401

NEDELL HAROLD - MEINEKE
6300 W LOOP S SUITE 200
BELLAIRE TX
77401

NESBITT JOHN
7851 METRO PKWY S 118
MPLS MN
55420

NEUMAN RALPH W
RT 2 BOX 125
EMBARRASS MN
55732

NIELSEN STOCK & BLACKBURN
415 730 BLDG
MPLS MN

NO SUB MONTESSORI-S SADDL
2487 HELEN COURT
NO ST PAUL MN
55109

NORTH CENTRAL ELEC ASSN
PO BOX 202
BATTLE LAKE MN
56515

NW COUNTRY ELEVATOR ASSN
802 GRAIN EXCH BLDG
MPLS MN
55415

NURSING HOME ADMRS BD EXAMRS
RM 340 717 DELAWARE SE
MPLS MN
55414

NUTTER JULIA
743 W MONTANA
ST PAUL MN
55117

NW BELL TEL CO LEGAL DEPT
224 S 5TH ST RM 2000
MPLS MN
55402

NYQUIST DEAN A
3707 53RD PL N
BROOKLYN CTR MN
55429

O'BRIEN J.DENNIS
1100 1ST NATL.BANK BLDG
MINNEAPOLIS MN
55402

OCONNOR GREEN THOMAS ET A
845 NW BANK BLDG
MPLS MN
55402

OFFICE OF THE GOVERNOR
130 STATE CAPITOL
ST PAUL MN
55101

OLD COLONY GAS & OIL COMPANY
17TH AVE N AT 2ND ST
MPLS MN
55411

OLOFSON ARTHUR MBO & MAINC
927 SOO LINE BLDG
MPLS MN
55402

OSTRUM DONALD E
PO BOX 33163
COON RAPIDS MN
55433

OTTER TAIL POWER CO.
215 S. CASCADE ST.
FERGUS FALLS MN
56537

PATTISON ORVIS
BOX 645
WILLMAR MN
56201

PAYNE COL ALVIN

DEGRAFF MN
56233

PAYNE WM B
2400 FIRST NATL BK BLDG
MPLS MN
55402

PETERSON JOHN W
510 NW BK BLDG
ST PAUL MN
55101

PETERSON GARY
854 MIDLAND BK BLDG
MPLS MN
55401

PFEIFER AND SHULTZ, INC
1433 UTICA AVE S
MPLS MN
55416

PHAR MFGRS ASSN WM D PATTON
1155 15TH ST NW
WASHINGTON DC DC
20005

PHILLIPS LEGISLATIVE SERVICE
459 RICE ST
ST PAUL MN
55103

PINNETTI NICK M HALEY & ASS.
40 CENTRAL PARK S
NEW YORK NY
10019

POPOVICH PETER S
314 MINN BLDG
ST PAUL MN
55101

PORTER LYLE O

TRACY MN
56175

PORT AUTH CITY OF ST PAUL
330 MINNESOTA BLDG
ST PAUL MN
55101

POSS DONALD G
6301 SHINGLE CREEK PKWY
BROOKLYN CTR MN
55430

POYZER ROBT
BOX 675
FERGUS FALLS MN
56357

PRAUSE JOS.C.
2220 105TH AVE.N.W.
COON RAPIDS MN

PROCTOR&GAMBLE L THEOHAROUS
IVORYDALE TECH CENTER
CINCINNATI OH

PULSCHER RBT SPRINGSTED INC
813 OSBORN BLDG
ST PAUL MN

MINN AFL-CIO, L O LA SHOMB
414 AUDITORIUM ST
ST PAUL MN
55102

MINN ASPHALT PAVEMENT ASSN
555 WABASHA RM 209
ST PAUL MN
55102

MINN ASSN COOPERATIVES
55 SHERBURNE AVE
ST PAUL MN
55103

MINN ASSN ELEC COOPERATIV
4901 W 77TH ST
MPLS MN
55435

MINN. ASSN. PET RETAILERS
1115 2ND AVE. SO.
MINNEAPOLIS MN
55403

MINN ASSN WATERSHED DIST'S

ADA MN
56510

MINN AUTOMOBILE DEALERS ASSN
GRIGGS MIDWAY BLDG
ST PAUL MN
55104

MINN COMM FOR HANDICAPPED
METRO SQ 492 7TH & ROBT
ST PAUL MN
55101

MINN COMMUNITY DEVELOP SERV
512 ROSSMOR BLDG
ST PAUL MN
55101

MINN COUNCIL STATE EMP NO 6
475 RICE ST
ST PAUL MN
55103

MINN DEPT HEALTH J C MCKASY
717 DELAWARE S E
MPLS MN
55440

MINN DENTAL HYGIENISTS
5041 YVONNE TERRACE
MPLS MN
55436

MINN ELECTRICAL ASSN INC
525 SO 7TH
MPLS MN
55415

MINN ENV LAW INST INC
PO BOX 15076 COMM STA
MPLS MN
55415

MINN FARMERS UNION PRES OFF
1275 UNIV AVE
ST PAUL MN
55104

MINN FOOD RETAILERS ASSN
555 WABASHA
ST PAUL MN
55101

MINN HEREFORD-LJ SCHAFER

BUFFALO LAKE MN
55314

MINN. HOTEL & MTR. ASSN
2001 UNIVERSITY AVE
ST PAUL MN

MINN HOUSING INST N T CARTER
7801 METRO PKWY
MPLS MN
55420

MINN HWYS MANAGEMENT SERV
407 HWY BLDG
ST PAUL MN
55101

MINN LAND USE COMMITTEE
4344 IDS CENTER
MPLS MN
55402

MINN LP GAS ASSN
7515 WAYZATA BLVD 106
MPLS MN
55426

MINNE MINE CREDIT UNION
3000 HUDSON PK S 100
ST PAUL MN
55119

MINN.MTR.TRANSP. .J.N.D
1821 UNIV.
ST.PAUL MN
55104

MINN PETROLEUM COUNCIL
1020 NORTHERN FED BLDG
ST PAUL MN
55102

MINN POULTRY & HATCHERY ASSN
BOX 158
MADELIA MN
56062

MN REP STATE CENTRAL COMM
555 WABASHA AVE
ST PAUL MN
55102

MINN RESTAURANT ASSN
2001 UNIVERSITY AVE.
ST PAUL MN 55
104

MINN RETAIL FEDERATION
7600 PARKLAWN STE 457
MPLS MN
55435

MINN RETAIL HARDWARE ASSN
3033 EXCELSIOR BLVD 313
MPLS MN
55416

MINN SCH BUS OPERATORS ASSN

FARIBAULT MN
55021

MINN SOCIETY ARCHITECTS A
NW NATL BK BLDG
ST PAUL MN
55101

MINN SOC CERTIFIED PUB ACCTS
1102 WESLEY TEMPLE BLDG
MPLS MN
55403

MINN STATE BAR ASSN
100 MINN FED BLDG
MPLS MN
55402

MINN STATE BD PHARMACY
717 DELAWARE ST SE #351
MPLS MN
55414

MINN STATE CAPITOL EMP UN
PO BOX 3215
ST PAUL MN
55165

MINN STATE MED ASSN
375 JACKSON ST
ST PAUL MN
55101

MINN STATE RETIREMENT SYSTEM
529 JACKSON ST
ST PAUL MN
55101

MINN TEAMSTERS CREDIT UNION
2021 HENN AVE E
MPLS MN
55413

MINN TBR PRODUCERS ASSN
200 CHRISTIE BLDG
DULUTH MN
55802

MINN.TURKEY GROWERS ASSN
2383 UNIV AVE
ST PAUL MN
55114

MINN VETERANS MED ASSN
2175 W HWY 36
ROSEVILLE MN
55113

MINN WATER RESOURCES BD
RM 206 555 WABASHA ST
ST PAUL MN
55102

MINN-WISC BOUNDARY AREA C
500 2ND ST
HUDSON WI
54016

MN PUB INT RESEARCH GROUP
3036 UNIV AVE SE
MPLS MN
55414

MOFFITT R.C. DIR.ENV.CONTROL
MPLS.CITY HALL RM 301M
MPLS MN
55415

MOOD R BLOOMINGTON HLTH DEPT
10200 PENN SQ
BLOOMINGTON MN

MOONEY, MICHAEL A.
BOX 903, ST.JOHN'S UNIV
COLLEGEVILLE MN

KNUTSON DR KEITH, BIOLOGY DPT
ST CLOUD STATE
ST CLOUD MN
56301

KNUTSON R N GRANNIS ETAL
F J SCHULT BLDG
ST ST PAUL MN
55075

KNVDSON ROBT
4375 BROWNDALE AVE
MPLS MN
55424

KOLLER MR & MRS ERWIN A
1568 DULUTH ST
ST PAUL MN
55108

KOPP MRS VERNON
2050 65TH ST E
INVER GR HGHT MN
55075

KRAMER ERNEST W
717 DELAWARE ST SE
MPLS MN
55440

KRONLOKKEN J E
10048 NORD RD
BLOOMINGTON MN
55437

LAKE SUPERIOR INDUSTRIAL BUR
828 FIRST AM. BK. BLDG.
DULUTH MN
55802

LANAHAN E F - SIBLEY CO
184 E 6TH ST
ST PAUL MN
55101

LANGVIN DAVID
7500 80TH ST S
COTTAGE GROVE MN
55016

LANSING & OAKES
400 SIBLEY ST
ST PAUL MN
55101

LAPP LAZAR LAURIE ET AL
1200 BUILDERS EXCHANGE
MINNEAPOLIS MN
55402

LARSON C L
3800 MINNEHAHA AVE SO
MPLS MN
55406

LARSON HANS P DIV HOSP SERV
717 DELAWARE ST SE
MPLS MN
55440

LEAGUE MN MUNIC
300 HANOVER 480 CEDAR
ST PAUL MN
55101

LEAGUE WOMEN VOTERS OF MINN
555 WABASHA
ST PAUL MN
55102

LIBBEY LEONARD
BOX 17011 NOKOMIS STA
MPLS MN
55417

LINDALL & JONATHAN DEVELOP.
VILLAGE ONE CENTER
CHASKA MN
55318

LOCKNER GARY
R R 1 BOX 23
BAUDETTE MN
56623

LOOS CALVIN J
6809 LYNDALE AVE SO
MPLS MN
55423

LOWE DOUG
2701 N LEXINGTON AVE
ROSEVILLE MN
55113

LYNCH DONALD SIBLEY CO
184 E 6TH ST
ST PAUL MN
55102

MCDONALD PHILIP M
2077 SELBY AVE
ST PAUL MN
55104

MCFADDEN G H DISPATCH-PRESS
55 E 4TH ST
ST PAUL MN
55101

MCKIBBON MRS SHIRLEY
11 EVERGREEN LN
BABBITT MN
55706

MCLELLAN LARKIN
215 ADM BLDG ST CAPITOL
ST PAUL MN
55101

MALONE E I COMM LABOR & INDU
444 LAFAYETTE RD 5TH FL
ST PAUL MN
55101

MANKATO STAT STUDENT SENATE
CENTENNIAL STUDENT UN
MANKATO MN
56001

MANKATO STATE STUDENT AS
BOX 58 MANKATO COLLEGE
MANKATO MN
56001

MANTHEY T J PICKANDS MATHER
1100 SUPERIOR AVE
CLEVELAND OH
44114

MASTOR & MATTSON LTD
315 PEAVEY BLDG
MPLS MN
55402

MAUL WARREN E
320 S 4TH ST
MPLS MN
55415

MAYO FOUNDATION G ORWOLL
200 FIRST AVE NW
ROCHESTER MN
55901

MECCA
867 GRAND AVE
ST PAUL MN
55105

MEIEROTTO, JOAN
1794 SO LEXINGTON
ST PAUL MN
55118

MERRITT GRANT POLLUTION CONT
1935 W CO RD 32
ROSEVILLE MN
55113

MET TER MEN ASSN A ROSENT
1821 UNIV AVE
ST PAUL MN
55104

METROPOLITAN COUNCIL LIBRARY
300 METRO SQUARE
ST PAUL MN
55155

MIDLAND GLASS- HD SPURLING
PO BOX 69
SHAKOPEE MN
55379

MILLER RICHARD A
1020 PLYMOUTH BLDG
MPLS MN
55402

MILLER TOM
2311 PILLSBURY AVE S
MPLS MN
55404

MPLS CHAMBER COMM TRANSP DPT
15 S 5TH ST
MPLS MN
55402

MPLS CITY ATTORNEY
325M CITY HALL
MPLS MN
55415

MPLS STAR PRESS ROOM
STATE CAPITOL
ST PAUL MN
55101

MPLS TRIBUNE CITY DESK
425 PORTLAND AVE
MPLS MN
55415

MIDLAND GLASS-HD SPURLING
PO BOX 69
SHAKOPEE MN

MILLER PAUL J PHARMACY SERV
ST MARYS HOSP
ROCHESTER MN

MINN APT ASSN
GRIGGS-MIDWAY BLDG
ST PAUL MN

MN. ASN.C&IND H.D.PETERSO
480 CEDAR ST.
ST.PAUL MN

HILL JIM ASSOC.MILK PROD.
7850 METRO PARKWAY
MINNEAPOLIS MN
55420

HINRICHSEN PATRICK
MANKATO FREE PRESS
MANKATO MN
56001

HOLDAHL SCOTT
380 N BLDG GRAIN EXCH
MPLS MN
55415

HOLEY GEO AERONAUTICS
DOWNTOWN AIRPORT
ST PAUL MN
55107

HOLMES EUSTIS ET AL
4610 IDS CENTER
MPLS MN
55402

HOPKINS WM.B. DIR.MISCCA
3915 GOLDEN VALLEY ROAD
GOLDEN VALLEY MN
55422

HORNER WALDORF - KAZIUKEWICZ
PO BOX 3260
ST PAUL MN
55165

HOULE MELVIN
881 W HWY 96
SHOREVIEW MN
55112

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HOUSE ED STANDING SUB COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HULSTRAND ANDERSON & LARSON
PO BOX 130
WILLMAR MN
56201

HULTMAN WARREN R
C/O BARBAROSSA R3
OSSEO MN
55369

HUMAN RIGHTS
200 CAPITOL SQ BLDG
ST PAUL MN
55101

HUNT JAMES P JR
11470 GALTIER DR
BURNSVILLE MN
55378

HUTCHISON R.M. ANOKA CO.COMP
COURT HOUSE
ANOKA MN
55303

HYLAND DEAN
1501 W 50TH ST
MPLS MN
55419

INGEBRIGTSEN DR K H
23 SE 4TH ST
MPLS MN
55414

INGVALSON VERN MN.FARM BUR.
3110 WOODDALE DR, PO 337
OST PAUL MN
55165

INS FED OF MINN
902 SOO LINE BLDG
MPLS MN
55402

INTERSTATE POWER RW STEELE
1000 MAIN ST
DUBUQUE IA
52001

IUOE LOC 49 CHAS SWENSON
2580 UNIV AVE
ST PAUL MN
55101

IVERSON DR JOS DEPT ED
ST OLAF COLLEGE
NORTHFIELD MN
55057

IZAAK WALTON LEAGUE MN DI
106 TIMES BLDG 57 S 4TH
MPLS MN
55401

JACKMAN DONALD G
4023 E LAKE ST
MPLS MN
55406

JAIN NIRMAL ENIV PROCESS
1220 GLENWOOD AVE
MPLS MN
55405

JENOS INC
525 LAKE AVE SO
DULUTH MN
55801

JENSEN CARL A
127 E MAIN ST
SLEEPY EYE MN
56085

JOHNSON & SANDERSON
ST MARYS HOSPITAL
ROCHESTER MN
55901

JOHNSON CLARENCE IBEW LU 292
3615 37TH AVE S
MPLS MN
55406

JOHNSON LEROY
9939 BLUEBIRD ST NW
COON RAPIDS MN
55433

JOHNSON M.D. FRUNDT & FRUNDT
BLUE EARTH MN
56013

JOHNSON LANCE J
265 S LAFAYETTE RD
ST PAUL MN
55107

KABLE RICHARD W
BETHEL MN
55006

KAVANEY RICHARD
1220 NORTHERN FED BLDG
ST PAUL MN
55102

KEABLE MIKE
909 6TH AVE N
ST CLOUD MN
56301

KEENAN RICHARD J
4444 IDS BLDG
MPLS MN
55402

KIMBALL ROBERT
647 CAPITOL SQ BLDG
ST PAUL MN
55101

KING,TIMOTHY
3333 OAKLAND AVE S
MPLS MN
55407

KLOSTER MARION PEAVEY CO
730 2ND AVE S
MPLS MN
55402

KLUZ STEVEN J
1910 1ST NATL BK BLDG
MPLS MN
55402

KNOPP TIMOTHY
COLLEGE FORESTRY U OF M
ST PAUL MN
55108

KNUTSON DR KEITH,BIOLOGY DPT
ST CLOUD STATE
ST CLOUD MN
56301

KNUTSON R N GRANNIS ETAL
F J SCHULT BLDG
ST ST PAUL MN
55075

KNVDSON ROBT
4375 BROWNDALE AVE
MPLS MN
55424

KOLLER MR & MRS ERWIN A
1568 DULUTH ST
ST PAUL MN
55108

FARRELL FRANK BUR NOR
RM 1180 176 E 5TH ST
ST PAUL MN
55101

FELHABER R S
W 1ST NATL BANK BLDG
ST PAUL MN
55101

FINLEY JAMES F
920 MINN BLDG
ST PAUL MN
55101

FINNEGAN J.R.
55 E. 4TH
ST.PAUL MN
55101

FLADLAND CLINTON MN L&P BUR
796 RAYMOND AVE
ST PAUL MN
55114

FLEMING FREDERICK A
1860 HIGHLAND PARKWAY
ST PAUL MN
55116

FITZGERALD DR BOB
3007 LYNDALE AVE SO
MPLS MN
55408

FORBES GORDON MINN RRS AS
203 HANOVER 480 CEDAR
ST PAUL MN
55101

FORSBERG AGR SERV
518 SUMMIT AVE
NEW ULM MN
56073

FOX W.E. LINDQUIST & VENNUM
4200 IDSCTR 80 S.8TH ST
MINNEAPOLIS MN
55402

FRANKLIN ROBERT B MPLS TRIB
426 PORTLAND
MPLS MN
55415

FREDIN CONRAD M
811 FIRST NATL BK BLDG
DULUTH MN
55802

FREDRIKSON BYRON ET AL
47TH FLR IDS CENTER M
PLS MN
55402

FURLONG DR JOHN
RT 1
BOVEY MN
55709

F W WOOLWORTH CO
3316 W 66TH ST
EDINA MN
55424

GALVIN M J JR
W2162 1ST NATL BK BLDG
ST PAUL MN
55101

GARDNER HDW - R A JOHNSON
515 WASHINGTON AVE N
MPLS MN
55401

GEBERT K L
220 GRAIN EXCH
MPLS MN
55415

GEO A HORMEL & CO LAW DE
PO BOX 800
AUSTIN MN
55912

GEORGE K GRANSE CO
1477 SELBY AVE
ST PAUL MN
55104

GIEL DAVID
RM B-28 STATE CAPITOL
ST PAUL MN
55155

GLEESON MICHAEL
909 SOC SC BLDG U OF M
MPLS MN
55455

GLEN. HILLS HOSP.R.VAN HA
3901 GOLDEN VALLEY RD.
MPLS. MN
55422

GODIN RALPH J
3824 47TH AVE SO
MPLS MN
55406

GRAHAM THOS H
854 MIDLAND BK BLDG
MPLS MN
55401

GRANATH MARVIN -HONEYWELL
2701 4TH AVE SO
MPLS MN
55408

GREATER MET AREA HOSPITAL
5152 CEDAR AVE S
MPLS MN
55417

GREEN DEL CITY MGR
BLOOMINGTON CITY HALL
BLOOMINGTON MN
55431

GREEN GARY J
41 SHERBURNE AVE
ST PAUL MN
55102

GREEN JANET
9773 N SHORE DR
DULUTH MN
55804

GUSTAFSON DAN-LABOR TEMPL
312 CENTRAL
MPLS MN
55414

GUSTAFSON WALLACE
BOX 567
WILLMAR MN
56201

H B FULLER CO
2400 KASOTA AVE
ST PAUL MN
55108

HANFT PHILIP M
1200 ALWORTH BLDG
DULUTH MN
55802

HANSON ETHEL
2813 85TH AVE N
MPLS MN
55444

HAROLD J WESTIN CONSTRUCTORS
45 E 8TH ST
ST PAUL MN
55101

HARVEY MICHAEL
1390 W M HAHA PKWY
MPLS MN
55409

HALLBERG LEE & MCCABE
4927 34TH AVE S
MPLS MN
55417

HAJN DR J W GEN MILLS
PO BOX 1113
MPLS MN
55440

HAYES, THOMAS W
700 SELLWOOD BLG
DULUTH MN
55812

HEALTH MANPOWER C LARSON
717 DELAWARE ST SE
MPLS MN
55440

HENTHORN GARY WOODSTOCK
7365 LANDAU DR
BLOOMINGTON MN
55438

HART PATRICK V
112 E LIBERTY BOX 3271
MANKATO MN
56001

HARTFELDT WILL
434 HAMM BLDG
ST PAUL MN
55102

HEAD & TRUHN
1007 SOO LINE BLDG
MPLS MN
55402

HEIM PAUL
1320 SOO LINE BLDG
MPLS MN

HEINTZ MARY ELLEN
PO BOX 599
CINCINNATI OH

HEISENFELT WM
BOX 516
BEMIDJI MN

HICHINGER-MARK PLANNING
421 WABASHA ST
ST PAUL MN

COLEMAN NICHOLAS D
700 LINWOOD AVE
ST PAUL MN
55105

CONSUMER SERVICES DEPT COMM
5TH FLR METRO SQ BLDG
ST PAUL MN
55101

CROW WING CO PLANNING & ADV
COURT HOUSE
BRAINERD MN
56401

DANFORTH & ALLEN
731 NW BANK BLDG
MPLS MN
55402

DICKINSON MRS JOANNE
BOX 1065
MARSHALL MN
56258

DOUGLASS BELL
525 OSBORN BLDG
ST PAUL MN
55102

DUNN OLIVER PLUMBERS LOC 15
708 SO 10TH ST
MPLS MN
55404

ELDER DR JAMES B
11140 WASHBURN AVE SO
BLOOMINGTON MN
55431

ENNIS A F BOISE CASCADE
PO BOX 713
INTL FALLS MN
56649

ESSE KENNETH
4801 W 50TH ST
EDINA MN
55424

EWING MRS WM
42 ASTAR RD
BABBITT MN
55706

FARRELL FRANK BUR NOR
RM 1180 176 E 5TH ST
ST PAUL MN
55101

COLLIN LAURENCE
RT 2
ISANTI MN
55040

COUNTY ATTYS COUNCIL
95 SHERBURNE AVE S203
ST PAUL MN
55103

CUSHMAN J S DAYTON HUDSON
700 NICOLLET MALL
MPLS MN
55402

DANKERS, KENNETH
1200 WEST FOURTH STREET
RED WING MN
55066

DIEHL JOHN
26 KENWOOD PKWY
ST PAUL MN
55105

DOW CHEMICAL
47 BLDG
MIDLAND MI
48640

DZUGAN KEN ST PAUL PLANNING
421 WABASHA ST
ST PAUL MN
55102

ELDRED R W ARMOUR & CO
UNION STOCK YARDS
SO ST PAUL MN
55075

ENV SERV-GEN RESOURCE CORP
6340 INDUSTRIAL DR
HOPKINS MN
55343

EVANS CHAS.L. PRENTICE-HALL
ENGELWOOD CLIFFS
NEW JERSEY

FELHABER R S
W 1ST NATL BANK BLDG
ST PAUL MN
55101

COMMUNITY DESIGN CENTER
118 E 26TH ST
MPLS MN
55404

COX AND KING
600 BUILDERS EXCH
MPLS MN
55402

DANIELSON RODNEY L
418 AUDITORIUM
ST PAUL MN
55102

DISPATCH PIONEER PRESS
PRESS RM STATE CAPITOL
ST PAUL MN
55101

DOYTON MAURICE, MET SEWER BD
350 METRO SQ BLDG
ST PAUL MN
55101

ELMER EDWIN W
2901 PLEASANT AVE
MPLS MN
55408

ERDMAN ROGER TENNANT CO
701 N LILAC DR
MPLS MN
55441

EVERETT JERRY NW PETRO ASSN
512 NICOLLET MALL RM917
MPLS MN
55402

FAEGRE & BENSON ATTN LIBR
1300 NW BANK BLDG
MPLS MN
55402

FINLEY JAMES F
920 MINN BLDG
ST PAUL MN
55101

CONCORDIA COLLEGE
DEAN
MOORHEAD MN
56560

CRAVEN NORMAN
10637 THOMAS AVE S
BLOOMINGTON MN
55431

DAILEY THOMAS ECONOMICS L
370 WABASHA ST
ST PAUL MN
55102

DAYTON CHAS SIERRA CLUB
800 MIDLAND BANK BLDG
MPLS MN
55401

DORSEY MARQUART
2400 1ST NATL BANK BLDG
MPLS MN
55402

DUDLEY E H
RT 7 BOX 122
EXCELSIOR MN
55331

EBELING EDWARD H.
161 W. MAIN
PERHAM MN
56573

EMERICK RICHARD A
1908 IDS CENTER
MPLS MN
55402

ERNEST K LEHMANN & ASSOC.
1409 WILLOW ST.
MPLS MN
55403

EWALD DOUGLAS MINN HOSP A
2333 UNIV AVE SE
MPLS MN
55414

FARMERS ELEVATOR ASSN
852 GRAIN EXCH BLDG
MPLS MN
55415

FINNEGAN J.R.
55 E. 4TH
ST.PAUL MN
55101

ASSN RESIDENCES FOR RETARDED
459 RICE SUITE 301
ST PAUL MN
55103

AUTOMOBILE MFRS ASSN INC
55 SHERBURNE AVE
ST PAUL MN
55103

BABCOCK LOCHER NELSON ET
118 E MAIN ST
ANOKA MN
55303

BADALICH JOHN P
2025 THOMPSON AVE
SO ST PAUL MN
55075

BARRETT FRED
ST LOUIS CO COURT HOUSE
DULUTH MN

BARKER KENT
8100 34TH AVE SO
MPLS MN
55420

BARTHOLOW HAROLD E FIRE C
2600 109 AVE N W
COON RAPIDS MN
55433

BECKLIN ROBERT C
447 N W 4TH
CAMBRIDGE MN
55008

BEECHER EVERETT
10 10 1ST ST SO
HOPKINS MN

BEMIDJI STATE COLLEGE
PLACEMENT BUR.J.C.BRADY
BEMIDJI MN
56601

BENSONI PETER USW OF AM
609 PROVIDENCE BLDG.
DULUTH MN

BERGERUD ALF
300 ROANOKE BLDG
MPLS MN
55402

BERGSETH THOMAS
1011 NICOLLET MALL
MPLS MN
55403

BEST FLANAGAN ET AL
[redacted]
MPLS MN
55402 4040 IDS Center

BEUTEL ROBERT
2200 SILVER LAKE RD
NEW BRIGHTON MN
55112

BLOMQUIST BARRY L

NORTH BRANCH MN
55056

BLOOMINGTON CITY CLERK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

BREHL JAMES W
332 HAMM BLDG
ST PAUL MN
55102

BRIGGS & MORGAN - B F (FRI -
2200 W 1ST NATL BK BLDG
ST PAUL MN
55101

BRIGHAM E M III
RR4
RED WING MN
55066

BROEKER JOHN
2850METRO DR. SUITE 504
BLOOMINGTON MN
55420

BROOKS WILLIAM F JR
854 MIDLAND BK BLDG
MPLS MN
55401

BROWN D M GOODRIDGE PUB S
IND DIST #561
GOODRIDGE MN
56725

BRUBACHER RICHARD COMM ADM
208 ADM BLDG
ST PAUL MN
55101

BRUNING C.R.DEPT.CLINIC.EXP.
BURTON HALL
MPLS. MN
55455

BUCHHOLTZ CHARLES
5044 BRENT AVE E
INV GRV HTS MN
55075

BURGER ALBERT
600 DEGREE OF HONOR BLD
ST PAUL MN
55101

BUR.ENGR.IND.DIV. MR.KIBIGER
219 N. 2ND ST.
MPLS. MN

BUR NATL AFFAIRS INC
1231 25TH ST NW
WASHINGTON DC
20037

BUSCH NOEL
3131 FERNBROOK LANE N
MPLS MN
55441

CAIN RUTH
730 E 38TH ST
MPLS MN
55407

CAIRNS JOHN A
47TH FLR IDS CENTER
MPLS MN
55402

CARLSON CARL L
7516 80TH ST S
COTTAGE GROVE MN
55016

CARLSON VERNE E
BOX 755 CITY HALL
WILLMAR MN
56201

CARRISON DALE K
MANKATO STATE COLLEGE
MANKATO MN
56001

CENTRAL BUSINESS DATA
BENSON RADIO ARCADE BLD
BENSON MN
56215

CENTRAL MN REGIONAL DEV COMM
1139 FRANKLIN AVE
SAUK RAPIDS MN
56379

CHAMBER OF COMMERCE
30 SO 1ST AVE EAST
ELY MN
55731

CHAMBERLAIN JOHN L
PO BOX 241
MPLS MN
55440

CHERCHES CHRIS CITY MGR
5005 MTKA BLVD
ST LOUIS PARK MN
55416

CHRISTIAN SCI COMM ON PUB
1821 UNIV AVE SUITE 271
ST PAUL MN
55104

CHRISTIANSEN FREDRIK
RM 505 CAPITOL SQ BLDG
ST PAUL MN
55155

CITY CLERK
386 CITY HALL
ST PAUL MN

CITIZENS LEAGUE
530 SYNDICATE BLDG
MPLS MN

CLARKSON J.B.
2350 I.D.S. CENTER
MINNEAPOLIS MN

CLAUSEN PHILLIP
2307 STANDISH ST
ST PAUL MN

ALBERT,AA CALDER CORP
366 JACKSON ST
ST PAUL MN
55101

ALLENDORF MARSHALL
220 GRAIN EX 400 S 4TH
MPLS MN
55415

ALTMAN MILTON H
707 DEGREE OF HONOR BLD
ST PAUL MN
55101

AM CAMPING ASSN MRS LEACOCK
1235 BRIGHTON SQ
NEW BRIGHTON MN
55112

AM INST PROF GEOLOGISTS
2201 PRINCETON AVE
ST PAUL MN
55105

ANCHOR BLOCK COMPANY
PO BOX 3360
ST PAUL MN
55165

ANDERSON GRAHAM
951 E HENN
MPLS MN
55414

ANDERSON HERBERT
418 8TH ST. SO.
VIRGINIA MN
55792

ANDERSON HAROLD
BOX 3047
MANKATO MN
56001

ANDERSON JAMES
7703 NORMANDALE RD
MPLS MN
55435

ANDERSON STANFORD P
14600 MINNETONKA BLVD
MINNETONKA MN
55343

ANTHONY DICK WDSM RADIO
230 E SUPR ST
DULUTH MN
55102

ARNOLD ROBERT MESPA
41 SHERBURNE
ST PAUL MN
55103

ARROWHEAD REGIONAL DEV COMM
900 ALWORTH BLDG
DULUTH MN
55802

ARVER JOHN A
2467 COHANCY
ST PAUL MN
55113

ASMUSSEN,DENNIS,MPIRG
3036 UNIV AVE SE
MPLS MN
55414

ASSOCIATED GEN CONTROF MN
48 E 8TH STREET
ST PAUL MN
55101

ASSOCIATED INDUST OF MPLS
NATIONAL BLDG
MPLS MN
55402

ASSN OF MINN COUNTIES
55 SHERBURNE AVE #203
ST PAUL MN
55103

ALBERT,AA CALDER CORP
366 JACKSON ST
ST PAUL MN
55101

ALLENDORF MARSHALL
220 GRAIN EX 400 S 4TH
MPLS MN
55415

ALTMAN MILTON H
707 DEGREE OF HONOR BLD
ST PAUL MN
55101

AM CAMPING ASSN MRS LEACOCK
1235 BRIGHTON SQ
NEW BRIGHTON MN
55112

AM INST PROF GEOLOGISTS
2201 PRINCETON AVE
ST PAUL MN
55105

ANCHOR BLOCK COMPANY
PO BOX 3360
ST PAUL MN
55165

ANDERSON GRAHAM
951 E HENN
MPLS MN
55414

ANDERSON HERBERT
416 8TH ST. SO.
VIRGINIA MN
55792

ANDERSON HAROLD
BOX 3047
MANKATO MN
56001

ANDERSON JAMES
7703 NORMANDALE RD
MPLS MN
55435

ANDERSON STANFORD P
14600 MINNETONKA BLVD
MINNETONKA MN
55343

ANTHONY DICK WDSM RADIO
230 E SUPR ST
DULUTH MN
55802

ARNOLD ROBERT MESPA
41 SHERBURNE
ST PAUL MN
55103

ARROWHEAD REGIONAL DEV COMM
900 ALWORTH BLDG
DULUTH MN
55802

ARVER JOHN A
2467 COHANCY
ST PAUL MN
55113

ASMUSSEN,DENNIS,MPIRG
3558 UNIV AVE SE
MPLS MN
55414

ASSOCIATED GEN CONTROF MN
46 E 8TH STREET
ST PAUL MN
55101

ASSOCIATED INDUST OF MPLS
NATIONAL BLDG
MPLS MN
55402

ASSN OF MINN COUNTIES
55 SHERBURNE AVE #203
ST PAUL MN
55103

ASSN RESIDENCES FOR RETARDED
459 RICE SUITE 301
ST PAUL MN
55103

AUTOMOBILE MFRS ASSN INC
55 SHERBURNE AVE
ST PAUL MN
55103

BABCOCK LOCHER NELSON ET
118 E MAIN ST
ANOKA MN
55303

BADALICH JOHN P
2025 THOMPSON AVE
SO ST PAUL MN
55075

BARRETT FRED
ST LOUIS CO COURT HOUSE
DULUTH MN

BARKER KENT
8100 34TH AVE SO
MPLS MN
55420

BARTHOLOW HAROLD E FIRE C
2600 109 AVE N W
COON RAPIDS MN
55433

BECKLIN ROBERT C
447 N W 4TH
CAMBRIDGE MN
55008

BEECHER EVERETT
10 10 1ST ST SO
HOPKINS MN

BEMIDJI STATE COLLEGE
PLACEMENT BUR.J.C.BRADY
BEMIDJI MN
56601

BENSONI PETER USW OF AM
609 PROVIDENCE BLDG.
DULUTH MN

BERGERUD ALF
500 ROANOKE BLDG
MPLS MN
55402

BERGSETH THOMAS
1011 NICOLLET MALL
MPLS MN
55403

BEST FLANAGAN ET AL
1ST NATL BANK BLDG
MPLS MN
55402

BEUTEL ROBERT
2200 SILVER LAKE RD
NEW BRIGHTON MN
55112

BLOOMQUIST BARRY L

NORTH BRANCH MN
55056

BLOOMINGTON CITY CLERK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

BREHL JAMES W
332 HAMM BLDG
ST PAUL MN
55102

BRIGGS & MORGAN - B F FRI
2200 W 1ST NATL BK BLDG
ST PAUL MN
55101

BRIGHAM E M III
RR4
RED WING MN
55066

BROEKER JOHN
2850METRO DR. SUITE 504
BLOOMINGTON MN
55420

BROOKS WILLIAM F JR
854 MIDLAND BK BLDG
MPLS MN
55401

BROWN D M GOODRIDGE PUB S
IND DIST #561
GOODRIDGE MN
56725

BRUBACHER RICHARD COMM ADM
200 ADM BLDG
ST PAUL MN
55101

BRUNING C.R.DEPT.CLINIC.EXP.
BURTON HALL
MPLS. MN
55455

BUCHHOLTZ CHARLES
5044 BRENT AVE E
INV GRV HTS MN
55075

BURGER ALBERT
600 DEGREE OF HONOR BLD
ST PAUL MN
55101

BUR.ERGN.INL.DIV. MR.KIBIGER
219 N. 2ND ST.
MPLS. MN

BUR NATL AFFAIRS INC
1231 25TH ST NW
WASHINGTON DC
20037

BUSCH NOEL
3131 FERNBROOK LANE N
MPLS MN
55441

CAIN RUTH
730 E 38TH ST
MPLS MN

CAIRNS JOHN A
47TH FLR IDS CENTER
MPLS MN

CARLSON CARL L
7916 80TH ST S
COTTAGE GROVE MN

CARLSON VERNE E
BOX 755 CITY HALL
WILLMAR MN

CARLSON DALE R
MANKATO STATE COLLEGE
MANKATO MN
56001

CHAMBERLAIN JOHN L
PO BOX 241
MPLS MN
55440

CITY CLERK
366 CITY HALL
ST PAUL MN
55102

COLEMAN NICHOLAS D
760 ERMOOD AVE
ST PAUL MN
55105

CONSUMER SERVICES DEPT COMM
5TH FLR METRO SQ BLDG
ST PAUL MN
55101

COOK WING CO PLANNING & ADV
COURT HOUSE
BRAINERD MN
56401

DANFORTH & ALLEN
731 RM BANK BLDG
MPLS MN
55402

DICKINSON MRS JOANNE
BOX 1069
MARSHALL MN
56258

DOUGLASS BELL
329 OSBORN BLDG
ST PAUL MN
55102

DOWN RIVER PLUMBERS LOC 15
708 SO 10TH ST
MPLS MN
55404

ELDER DR JAMES B
11240 NASHBURN AVE SO
BLOOMINGTON MN
55431

ENNIS A F BOISE CASCADE

CENTRAL BUSINESS DATA
BENSON RADIO ARCADE BLD
BENSON MN
56215

CHERCHES CHRIS CITY MGR
5005 MTKA BLVD
ST LOUIS PARK MN
55416

CITIZENS LEAGUE
530 SYNDICATE BLDG
MPLS MN
55402

COLLIN LAURENCE
RT 2
ISANTI MN
55040

COUNTY ATTYS COUNCIL
95 SHERBURNE AVE S203
ST PAUL MN
55103

CUSHMAN J S DAYTON HUDSON
700 NICOLLET MALL
MPLS MN
55402

DANKERS,KENNETH
1200 WEST FOURTH STREET
RED WING MN
55066

DIEHL JOHN
26 KENWOOD PKWY
ST PAUL MN
55105

DOW CHEMICAL
47 BLDG
MIDLAND MI
48640

DZUGAN KEN ST PAUL PLANNING
421 WABASHA ST
ST PAUL MN
55102

ELDRED R W ARMOUR & CO
UNION STOCK YARDS
SO ST PAUL MN
55075

ENV SERV-GEN RESOURCE CORP
6346 INDUSTRIAL DR

CENTRAL MN REGIONAL DEV COMM
1139 FRANKLIN AVE
SAUK RAPIDS MN
56379

CHRISTIAN SCI COMM ON PUB
1821 UNIV AVE SUITE 271
ST PAUL MN
55104

CLARKSON J.B.
2350 I.D.S. CENTER
MINNEAPOLIS MN
55402

COMMUNITY DESIGN CENTER
116 E 26TH ST
MPLS MN
55404

COX AND KING
600 BUILDERS EXCH
MPLS MN
55402

DANIELSON RODNEY L
416 AUDITORIUM
ST PAUL MN
55102

DISPATCH PIONEER PRESS
PRESS RM STATE CAPITOL
ST PAUL MN
55101

DOYTON MAURICE, MET SEWER BD
350 METRO SQ BLDG
ST PAUL MN
55101

ELMER EDWIN W
2901 PLEASANT AVE
MPLS MN
55408

ERDMAN ROGER TENNANT CO
701 N LILAC DR

CHAMBER OF COMMERCE
30 SO 1ST AVE EAST
ELY MN
55731

CHRISTIANSEN FREDRIK
RM 505 CAPITOL SQ BLDG
ST PAUL MN
55155

CLAUSEN PHILLIP
2307 STANDISH ST
ST PAUL MN
55108

CONCORDIA COLLEGE
DEAN
MOORHEAD MN
56560

CRAVEN NORMAN
10637 THOMAS AVE S
BLOOMINGTON MN
55431

DAILEY THOMAS ECONOMICS L
370 WABASHA ST
ST PAUL MN
55102

DAYTON CHAS SIERRA CLUB
800 MIDLAND BANK BLDG
MPLS MN
55401

DORSEY MARQUART
2400 1ST NATL BANK BLDG
MPLS MN
55402

DUDLEY E H
RT 7 BOX 122
EXCELSIOR MN
55331

EBELING EDWARD H.
161 W. MAIN
PERHAM MN
56573

EMERICK RICHARD A
1908 IDS CENTER
MPLS MN
55402

ERNEST K LEHMANN & ASSOC.
1409 WILLOW ST.
MPLS MN

ESSE KENNETH
4901 W 50TH ST
EDINA MN
55424

EVANS CHAS.L. PRENTICE-HALL
ENGELWOOD CLIFFS
NEW JERSEY

EVERETT JERRY NW PETRO ASSN
512 NICOLLET MALL RM917
MPLS MN
55402

EWALD DOUGLAS MINN HOSP A
2333 UNIV AVE SE
MPLS MN
55414

EWING MRS WM
42 ASTOR RD
SAGUITT MN
55706

FAEGRE & BENSON ATTN LIBR
1300 NW BANK BLDG
MPLS MN
55402

FARMERS ELEVATOR ASSN
852 GRAIN EXCH BLDG
MPLS MN
55415

FARRELL FRANK BUR NOR
RM 1200 176 E 5TH ST
ST PAUL MN
55101

FELHABER R S
W 1ST NATL BANK BLDG
ST PAUL MN
55101

FINLEY JAMES F
920 MINN BLDG
ST PAUL MN
55101

FINNEGAN J.R.
55 E. 4TH
ST.PAUL MN
55101

FLASLAND CLINTON MN L&P BUR
1700 RAYMOND AVE
ST PAUL MN
55114

FLEMING FREDERICK A
1800 HIGHLAND PARKWAY
ST PAUL MN
55116

FITZGERALD DR BOB
3007 LYNDALE AVE SO
MPLS MN
55408

FORBES GORDON MINN RRS AS
203 HANOVER 480 CEDAR
ST PAUL MN
55101

FORSBERG AGR SERV
515 SUMMIT AVE
NEW ULM MN
56073

FOX W.E. LINDQUIST & VENNUM
4200 IDSCTR 80 S.8TH ST
MINNEAPOLIS MN
55402

FRANKLIN ROBERT B MPLS TRIB
426 PORTLAND
MPLS MN
55415

FREDIN CONRAD M
811 FIRST NATL BK BLDG
DULUTH MN
55802

FREDRIKSON BYRON ET AL
477M FLR ILS CENTER M
MPLS MN
55402

FURLONG DR JOHN
RT 1
BOVEY MN
55709

F W WOOLWORTH CO
3310 W 66TH ST
EDINA MN
55424

GALVIN M J JR
W2192 1ST NATL BK BLDG
ST PAUL MN
55101

GARDNER HOW - R A JOHNSON
515 WASHINGTON AVE N
MPLS MN
55401

GEBERT K L
220 GRAIN EXCH
MPLS MN
55415

GEO A HORMEL & CO LAW DE
PO BOX 800
AUSTIN MN
55912

GEORGE K GRANSE CO
1477 SELBY AVE
ST PAUL MN
55104

GIEL DAVID
RM B-28 STATE CAPITOL
ST PAUL MN
55155

GLEESON MICHAEL
909 SCC SC BLDG U OF M
MPLS MN
55455

GLEN. HILLS HOSP.R.VAN HA
3901 GOLDEN VALLEY RD.
MPLS. MN
55422

GODIN RALPH J
3524 47TH AVE SO
MPLS MN
55406

GRAHAM THOS H
654 MIDLAND BK BLDG
MPLS MN
55401

GRANATH MARVIN -HONEYWELL
2701 4TH AVE SO
MPLS MN
55406

GREATER MET AREA HOSPITAL
5152 CEDAR AVE S
MPLS MN
55417

GREEN DEL CITY MGR
BLOOMINGTON CITY HALL
BLOOMINGTON MN
55431

GREEN GARY J
41 SHERBURNE AVE
ST PAUL MN
55102

GREEN JANET
9773 N SHORE DR
DULUTH MN
55804

GUSTAFSON DAN-LABOR TEMPL
312 CENTRAL
MPLS MN
55414

GUSTAFSON WALLACE
BOX 567
WILLMAR MN
56201

H B FULLER CO
2400 KASOTA AVE
ST PAUL MN
55108

HANFT PHILIP M
1200 ALWORTH BLDG
DULUTH MN
55802

HANSON ETHEL
2613 69TH AVE N
MPLS MN

HAROLD J WESTIN CONSTRUCTORS
45 E 8TH ST
ST PAUL MN

HARVEY MICHAEL
1390 W M HAHA PKWY
MPLS MN

HALLBERG LEE & MCCABE
4927 34TH AVE S
MPLS MN

HAUK DR J W GEN MILLS
PO BOX 1113
MPLS MN
55440

HESS DONALD MIDWEST PLANNING
2101 HENN BLDG
MPLS MN
55403

HEIM PAUL
1320 SOO LINE BLDG
MPLS MN
55402

HILL JIM ASSOC.MILK PROD.
7600 METRO PARKWAY
MINNEAPOLIS MN
55420

HOLMES EUSTIS ET AL
4610 IDS CENTER
MPLS MN
55402

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HUMAN RIGHTS
200 CAPITOL SQ BLDG
ST PAUL MN
55101

INTERSTATE POWER RW STEELE
1000 MAIN ST
DUBUQUE IA
52001

JENSEN CARL A
107 E MAIN ST
SLEEPY EYE MN
56085

JOHNSON M.D. FRUNDT & FRUNDT

HAYES, THOMAS M
700 SELLWOOD BLG
DULUTH MN
55812

HART PATRICK V
112 E LIBERTY BOX 3271
MANKATO MN
56001

HEINTZ MARY ELLEN
PO BOX 599
CINCINNATI OH
45201

HINRICHSEN PATRICK
MANKATO FREE PRESS
MANKATO MN
56001

HOPKINS WM.B. DIR.MISCCA
3915 GOLDEN VALLEY ROAD
GOLDEN VALLEY MN
55422

HOUSE ED STANDING SUB COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HUNT JAMES P JR
11470 GALTIER DR
BURNSVILLE MN
55378

INGEBRIGTSEN DR K H
23 SE 4TH ST
MPLS MN
55414

IUOE LOC 49 CHAS SWENSON
2560 UNIV AVE
ST PAUL MN
55101

JACKMAN DONALD G
4023 E LAKE ST
MPLS MN
55406

JOHNSON & SANDERSON
ST MARYS HOSPITAL
ROCHESTER MN
55901

JOHNSON LANCE J
225 S LAFAYETTE RD

HEALTH MANPOWER C LARSON
717 DELAWARE ST SE
MPLS MN
55440

HARTFELDT WILL
434 HAMM BLDG
ST PAUL MN
55102

HEISENFELT WM
BOX 516
BEMIDJI MN
56601

HOLDAHL SCOTT
380 N BLDG GRAIN EXCH
MPLS MN
55415

HOKKER WALDORF - KAZIUKEWICZ
PO BOX 3260
ST PAUL MN
55165

HOLSTRAND ANDERSON & LARSON
PO BOX 130
WILLMAR MN
56201

HUTCHISON R.M. ANOKA CO.COMP
COURT HOUSE
ANOKA MN
55303

INGVALSON VERN MN.FARM BUR.
3110 WOODDALE DR PO 337
OST PAUL MN
55165

IVERSON DR JOS DEPT ED
ST OLAF COLLEGE
NORTHFIELD MN
55057

JAIN NIRMAL ENIV PROCESS
1220 GLENWOOD AVE
MPLS MN
55405

JOHNSON CLARENCE IBEW LU 292
3615 37TH AVE S
MPLS MN
55406

HENTHORN GARY WOODSTOCK
7365 LANDAU DR
BLOOMINGTON MN
55438

HEAD & TRUHN
1007 SOO LINE BLDG
MPLS MN
55402

HICHINGER-MARK PLANNING
421 WABASHA ST
ST PAUL MN
55102

HOLEY GEO AERONAUTICS
DOWNTOWN AIRPORT
ST PAUL MN
55107

HOULE MELVIN
881 W HWY 96
SHOREVIEW MN
55112

HULTMAN WARREN R
C/O BARBAROSSA R3
OSSEO MN
55369

HYLAND DEAN
1501 W 50TH ST
MPLS MN
55419

INS FED OF MINN
902 SOO LINE BLDG
MPLS MN
55402

IZAAK WALTON LEAGUE MN DI
106 TIMES BLDG 57 S 4TH
MPLS MN
55401

JENUS INC
525 LAKE AVE SO
DULUTH MN
55801

JOHNSON LEROY
9939 BLUEBIRD ST NW
COON RAPIDS MN
55433

KABLE RICHARD M
MN

[illegible]
1220 NORTHERN FED BLDG
ST PAUL MN
55102

KEABLE MIKE
909 6TH AVE N
ST CLOUD MN
56301

KEENAN RICHARD J
4444 IDS BLDG
MPLS MN
55402

KIMBALL ROBERT
647 CAPITOL SQ BLDG
ST PAUL MN
55101

KING,TIMOTHY
3333 OAKLAND AVE S
MPLS MN
55407

KLOSTER MARION PEAVEY CO
730 2ND AVE S
MPLS MN
55402

KLOZ STEVEN J
1910 1ST NATL BK BLDG
MPLS MN
55402

KNOPP TIMOTHY
COLLEGE FORESTRY U OF M
ST PAUL MN
55108

KNUTSON DR KEITH,BIOLOGY DPT
ST CLOUD STATE
ST CLOUD MN
56301

KNUTSON R N GRANNIS ETAL
F J SCHULT BLDG
ST ST PAUL MN
55075

KNUDSON ROBT
4375 BROWNDALE AVE
MPLS MN
55424

KOLLER MR & MRS ERWIN A
1568 DULUTH ST
ST PAUL MN
55106

KOPP MRS VERNON
2050 65TH ST E
INVER GR HGHT MN
55075

KRAMER ERNEST h
717 DELAWARE ST SE
MPLS MN
55440

KRONLOKKEN J E
10048 NORD RD
BLOOMINGTON MN
55437

LAKE SUPERIOR INDUSTRIAL BUR
328 FIRST AM. BK. BLDG.
DULUTH MN
55802

LANAHAN E F - SIBLEY CO
184 E 6TH ST
ST PAUL MN
55101

LANGVIN DAVID
7500 80TH ST S
COTTAGE GROVE MN
55016

LANSING & OAKES
400 SIBLEY ST
ST PAUL MN
55101

LAPP LAZAR LAURIE ET AL
2200 BUILDERS EXCHANGE
MINNEAPOLIS MN
55402

LARSON C L
3800 MINNEHAHA AVE SO
MPLS MN
55406

LARSON HANS P DIV HOSP SERV
717 DELAWARE ST SE
MPLS MN
55440

LEAGUE MN MUNIC
300 HANOVER 480 CEDAR
ST PAUL MN
55101

LEAGUE WOMEN VOTERS OF MINN
555 WABASHA
ST PAUL MN
55102

LIBBEY LEONARD
BLK 17011 NOKOMIS STA
MPLS MN
55417

LINDALL & JONATHAN DEVELOP.
VILLAGE ONE CENTER
CHASKA MN
55318

LOCKNER GARY
R R 1 BOX 23
BAUDETTE MN
56623

LOOS CALVIN J
6609 LYNDALE AVE SO
MPLS MN
55423

LOWE DOUG
2701 N LEXINGTON AVE
ROSEVILLE MN
55113

LYNCH DONALD SIBLEY CO
184 E 6TH ST
ST PAUL MN
55102

MCDONALD PHILIP M
2077 SELBY AVE
ST PAUL MN
55104

MCFADDEN G H DISPATCH-PRESS
55 E 4TH ST
ST PAUL MN
55101

MCKIBBON MRS SHIRLEY
11 EVERGREEN LN
BABBITT MN
55706

MCLELLAN LARKIN
215 ADM BLDG ST CAPITOL
ST PAUL MN
55101

MALONE E I COMM LABOR & INDU
444 LAFAYETTE RD 5TH FL
ST PAUL MN
55101

MANKATO STAT STUDENT SENATE
CENTENNIAL STUDENT UN
MANKATO MN
56001

MANKATO STATE STUDENT AS
BOX 58 MANKATO COLLEGE
MANKATO MN
56001

MANTHEY T J PICKANDS MATHER
1100 SUPERIOR AVE
CLEVELAND OH
44114

MASTOR & MATTSON LTD
315 PEAVEY BLDG
MPLS MN
55402

MAUL WARREN E
320 S 4TH ST
MPLS MN
55415

MAYO FOUNDATION G ORWOLL
200 FIRST AVE NW
ROCHESTER MN
55901

MCCA
867 GRAND AVE
ST PAUL MN

MEIEROTTO, JOAN
1754 SC LEXINGTON
ST PAUL MN

MCRITT GRANT POLLUTION CONT
1935 W CO RD 32
ROSEVILLE MN

MET TFR MEN ASSN A ROSENT
1821 UNIV AVE
ST PAUL MN

METROPOLITAN COUNCIL LIBRARY
300 METRO SQUARE
ST PAUL MN
55159

MIDLAND GLASS- HD SPURLING
PO BOX 69
SHAKOPEE MN
55379

MILLER RICHARD A
1020 PLYMOUTH BLDG
MPLS MN
55402

MILLER TOM
2311 PILLSBURY AVE S
MPLS MN
55404

MPLS CHAMBER COMM TRANSP DPT
15 S 5TH ST
MPLS MN
55402

MPLS CITY ATTORNEY
325M CITY HALL
MPLS MN
55415

MPLS STAR PRESS ROOM
STATE CAPITOL
ST PAUL MN
55101

MPLS TRIBUNE CITY DESK
425 PORTLAND AVE
MPLS MN
55415

MIDLAND GLASS-HD SPURLING
PO BOX 69
SHAKOPEE MN
55379

MILLER PAUL J PHARMACY SERV
ST MARYS HOSP
ROCHESTER MN
55901

MINN APT ASSN
GRIGGS-MIDWAY BLDG
ST PAUL MN
55104

MN. ASN.C&IND H.D.PETERSO
480 CEDAR ST.
ST.PAUL MN
55101

MINN AFL-CIO, L D LA SHOMB
414 AUDITORIUM ST
ST PAUL MN
55102

MINN ASPHALT PAVEMENT ASSN
555 WABASHA RM 209
ST PAUL MN
55102

MINN ASSN COOPERATIVES
55 SHERBURNE AVE
ST PAUL MN
55103

MINN ASSN ELEC COOPERATIV
4901 W 77TH ST
MPLS MN
55435

MINN. ASSN. PET RETAILERS
1119 2ND AVE. SO.
MINNEAPOLIS MN
55403

MINN ASSN WATERSHED DIST'S

ADA MN
56510

MINN AUTOMOBILE DEALERS ASSN
GRIGGS MIDWAY BLDG
ST PAUL MN
55104

MINN COMM FOR HANDICAPPED
METRO SQ 492 7TH & ROBT
ST PAUL MN
55101

MINN COMMUNITY DEVELOP SERV
512 ROSSMOR BLDG
ST PAUL MN
55101

MINN COUNCIL STATE EMP NO 6
475 RICE ST
ST PAUL MN
55103

MINN DEPT HEALTH J C MCKASY
717 DELAWARE S E
MPLS MN
55440

MINN DENTAL HYGIENISTS
5041 YVONNE TERRACE
MPLS MN
55436

MINN ELECTRICAL ASSN INC
525 SO 7TH
MPLS MN
55415

MINN ENV LAW INST INC
PO BOX 15076 COMM STA
MPLS MN
55415

MINN FARMERS UNION PRES OFF
1275 UNIV AVE
ST PAUL MN
55104

MINN FOOD RETAILERS ASSN
555 WABASHA
ST PAUL MN
55101

MINN HEREFORD-LJ SCHAFER

BUFFALO LAKE MN
55314

MINN. HOTEL & MTR. ASSN
2001 UNIVERSITY AVE
ST PAUL MN

MINN HOUSING INST N T CARTER
7601 METRO PKWY
MPLS MN
55420

MINN HWYS MANAGEMENT SERV
407 HWY BLDG
ST PAUL MN
55101

MINN LAND USE COMMITTEE
4344 IDS CENTER
MPLS MN
55402

MINN LP GAS ASSN
7515 WAYZATA BLVD 106
MPLS MN
55426

MINNE MINE CREDIT UNION
3000 HUDSON PK S 100
ST PAUL MN
55119

MINN.MTR.TRANSP. .J.N.D
1821 UNIV.
ST.PAUL MN
55104

MINN PETROLEUM COUNCIL
1020 NORTHERN FED BLDG
ST PAUL MN
55102

MINN POULTRY & HATCHERY ASSN
BOX 158
MADELIA MN
56062

MN REP STATE CENTRAL COMM
555 WABASHA AVE
ST PAUL MN
55102

MINN RESTAURANT ASSN
2001 UNIVERSITY AVE.
ST PAUL MN 55
104

MINN RETAIL FEDERATION
7600 PARKLAWN STE 457
MPLS MN
55435

MINN RETAIL HARDWARE ASSN
3033 EXCELSIOR BLVD 313
MPLS MN
55416

MINN SCH BUS OPERATORS ASSN

FARIBAULT MN
55021

MINN SOCIETY ARCHITECTS A
NW NATL BK BLDG
ST PAUL MN
55101

MINN SOC CERTIFIED PUB ACCTS
1102 WESLEY TEMPLE BLDG
MPLS MN

MINN STATE BAR ASSN
100 MINN FED BLDG
MPLS MN

MINN STATE BD PHARMACY
717 DELAWARE ST SE #351
MPLS MN

MINN STATE CAPITOL EMP UN
PO BOX 3215
ST PAUL MN

MINN STATE MED ASSN
570 JACKSON ST
ST PAUL MN
55101

MINN STATE RETIREMENT SYSTEM
529 JACKSON ST
ST PAUL MN
55101

MINN TEAMSTERS CREDIT UNION
2021 HENN AVE E
MPLS MN
55413

MINN TBR PRODUCERS ASSN
200 CHRISTIE BLDG
DULUTH MN
55802

MINN TURKEY GROWERS ASSN
2303 UNIV AVE
ST PAUL MN
55114

MINN VETERANS MED ASSN
2175 N HWY 36
ROSEVILLE MN
55113

MINN WATER RESOURCES BD
RM 208 555 WABASHA ST
ST PAUL MN
55102

MINN-WISC BOUNDARY AREA C
600 2ND ST
HUDSON WI
54016

MN PUB INT RESEARCH GROUP
3036 UNIV AVE SE
MPLS MN
55414

MOFFITT R.C. DIR.ENV.CONTROL
MPLS.CITY HALL RM 301M
MPLS MN
55415

MOOD R BLOOMINGTON HLTH DEPT
10200 PENN SO
BLOOMINGTON MN
55431

MOONEY, MICHAEL A.
BOX 903, ST.JOHN'S UNIV
COLLEGEVILLE MN
56321

MORTON BUILDINGS INC
N #1
FOLEY MN
56329

MPIRG
BOX 45 ST MARYS COLLEGE
WINONA MN
55987

MUELLER SHIRLEY A
787 N COTTAGE AVE
ST PAUL MN
55117

MASS GEN V PENN CO GEN HOSP
5TH AND PORTLAND AVE
MPLS MN
55415

NATL CAR RENTAL ATT D MITZEL
5501 GREEN VALLEY DR
MPLS MN
55437

NATL COUNCIL JEWISH WOMEN
4330 CEDAR LK RD
MPLS MN
55416

NATL FAMILY INS CO
2147 UNIV AVE
ST PAUL MN
55114

NATL SOLID WASTES-R. GRASSO
1730 RHODE ISLAND AV.NW
WASHINGTON DC
20036

NCEC INC C/O DR DAHLBERG
CONCORDIA COLLEGE
MOORHEAD MN
56560

NELSON DONALD E NSP CO
414 NICOLLET AVE
MPLS MN
55401

NEDELL HAROLD - MEINEKE
6300 W LOOP S SUITE 200
BELLAIRE TX
77401

NESBITT JOHN
7001 METRO PKWY S 110
MPLS MN
55420

NELMAN RALPH N
RT 2 BOX 125
EMBARRASS MN
55732

NIELSEN STOCK & BLACKBURN
415 730 BLDG
MPLS MN

NO SUB MONTESSORI-S SADDL
2487 HELEN COURT
NO ST PAUL MN
55109

NORTH CENTRAL ELEC ASSN
PO BOX 202
BATTLE LAKE MN
56515

NW COUNTRY ELEVATOR ASSN
802 GRAIN EXCH BLDG
MPLS MN
55415

NURSING HOME ADMRS BD EXAMRS
RM 340 717 DELAWARE SE
MPLS MN
55414

NUTTER JULIA
743 W MONTANA
ST PAUL MN
55117

NW BELL TEL CO LEGAL DEPT
220 S 5TH ST RM 2000
MPLS MN
55402

NYGLIST DEAN A
3707 53RD PL N
BROOKLYN CTR MN
55429

O'BRIEN J.DENNIS
1100 1ST NATL.BANK BLDG
MINNEAPOLIS MN
55402

OCONNOR GREEN THOMAS ET A
845 NW BANK BLDG
MPLS MN
55402

OFFICE OF THE GOVERNOR
130 STATE CAPITOL
ST PAUL MN
55101

OLD COLONY GAS & OIL COMPANY
17TH AVE N AT 2ND ST
MPLS MN
55411

OLOFSON ARTHUR MBD & MAINC
927 SOO LINE BLDG
MPLS MN
55402

OSTRUM DONALD E
PO BOX 33163
COON RAPIDS MN
55433

OTTER TAIL POWER CO.
215 S. CASCADE ST.
FERGUS FALLS MN
56537

PATTISON ORVIS
BOX 645
WILLMAR MN
56201

PAYNE COL ALVIN

DEGRAFF MN
56233

PAYNE WM B
2001 FIRST NATL BK BLDG

PETERSON JOHN N
510 NW BK BLDG

PETERSON GARY
854 MIDLAND BK BLDG

PFEIFER AND SHULTZ, INC
1433 UTICA AVE S
MPLS MN

MNAA MFGRS ASSN WM C PATTON
1155 15TH ST NW
WASHINGTON DC
20005

PORTER LYLE D
TRACY MN
56175

PRAUSE JOS.C.
2220 105TH AVE.N.W.
COON RAPIDS MN
55433

QUINN E W
400 MAY BLDG
ST PAUL MN
55155

RADERMACHT CORP-C ANDERSON
7900 XERXES S. S-2200
MPLS MN
55431

RAMSEY CO MEDICAL SOCIETY
1900 LOWRY MEDICAL BLDG
ST PAUL MN
55102

ROBOTE JOSEPH
304 CARGILL BLDG NO CTR
MPLS MN
55402

SAX DOVE & STENSON
310 ENDICOTT BLDG
ST PAUL MN
55101

SCARBOROUGH WILLIAM
DIV.CO. U.M.
MORRIS MN
56267

SCHMIDT LARRY WCCO-TV NEWS
90 S 9TH ST
MPLS MN
55402

SCHWERMAN EARL JR
1999 6TH AVE SE
ROCHESTER MN

PHILLIPS LEGISLATIVE SERVICE
459 RICE ST
ST PAUL MN
55103

PORT AUTH CITY OF ST PAUL
330 MINNESOTA BLDG
ST PAUL MN
55101

PROCTOR&GAMBLE L THECHARGUS
IVORYDALE TECH CENTER
CINCINNATI OH
45217

RADMAN RICHARD-LABOR TEMPLE
41a AUDITORIUM
ST PAUL MN
55102

RED OWL STORES INC
215 E EXCELSIOR AVE
HOPKINS MN
55343

RICHARDSON THOS
7651 METRO PKWY S 103
MPLS MN
55420

ROBERTS DAVID E
1200 NW NATL BK BLDG
ST PAUL MN
55101

SAN SIMEON DEVELOP CORP
OLD 1ST STATE BK BLDG
PAYNESVILLE MN

ST PAUL ASSN PLBG HTG MECH
614 AM NATL BK
ST PAUL MN

SCHLICHT REV ROBT
611 W MAIN ST
BELLE PLAINE MN
56011

SCHNEIDER MAHLON
GREEN GIANT
LESUEUR MN
56058

SCHWINN ROBT.P.
1400 SOO LINE BLDG.
MPLS. MN

PINNETTI NICK M HALEY & ASS.
40 CENTRAL PARK S
NEW YORK NY
10019

POSS DONALD G
6301 SHINGLE CREEK PKWY
BROOKLYN CTR MN
55430

PULSCHER ROBT SPRINGSTED INC
813 OSBORN BLDG
ST PAUL MN
55102

REID DAVID H
5633 WASHBURN AVE S
MPLS MN
55410

ROSS ALFRED
6356 WAKE RD
LINO LAKES MN
55014

SANFORD S M
7000 PORTLAND AVE
RICHFIELD MN
55423

ST PAUL BUR HLTH DR P COX
555 CEDAR ST
ST PAUL MN
55101

SCHMIDT D R MN ASSN REALTORS
6101 WAYZATA BLVD
MPLS MN
55416

SCHUTZ LINDA
RM 328 CAPITOL BLDG
ST PAUL MN
55155

SCHNEIDER & NEESER
706 1ST ST SO PO BX 876
WILLMAR MN

POPOVICH PETER S
314 MINN BLDG
ST PAUL MN
55101

POYZER ROBT
BOX 675
FERGUS FALLS MN
56357

RANALLO CLARENCE
800 CENTRAL AVE N E
MPLS MN
55413

RENNER R.H. ST PAUL AREA
300 OSBORN BLDG.
ST PAUL MN
55102

RUDY FLOYD
118 AVE C
CLOQUET MN
55720

SATHRE, HARVEY
375 MARION STREET
ST PAUL MN
55103

ST PAUL FOOD RETAILERS AS
1220 ARCADE
ST PAUL MN
55106

SCHMIDT H W TCHRS RETIREM
302 CAPITOL SQ BLDG
ST PAUL MN
55101

SCHWARTAU NEAL METH HOSP
201 W CENTER ST
ROCHESTER MN
55901

SCHROEDER ALFRED H
2172 CARROLL AVE
ST PAUL MN

SENATE COUN OFF ROOM 24
STATE CAPITOL
ST PAUL MN
55101

SENATE FINANCE COMMITTEE
113 STATE CAPITOL
ST PAUL MN
55101

SENATE GOV OP COMM
RM 303 STATE CAPITOL
ST PAUL MN
55155

SHABATURA EUGENE H
2833 LAKE AVE SO
DULUTH MN
55811

SHARP BOB
4125 HIGHWOOD RD
ST LOUIS PK MN
55416

SHAW ROBERT M
616 MOBIL OIL BLDG
MPLS MN
55402

SHELL OIL CO. W.A. ROQUET
ONE SHELL PLAZA BX 2463
HOUSTON TX
77001

SITE ENGINEERS INC
900 REDWELL LANE
APPLE VALLEY MN
55124

SKELLY OIL CO K R WELLINGTON
PO BOX 436
KANSAS CITY MO

SLOCUM CHARLES A
1203 IDS TOWER
MPLS MN
55402

SMERIKA WM.
BOISE CASCADE PAPERS
INTL FALLS MN
56649

SMITH MICHAEL
1423 NEWTON AVE N
MPLS MN
55411

SNELL LYN
BOX 314
EDEN VALLEY MN
55329

SNYDER ROBERT W
248 CC B U OF M
ST PAUL MN
55101

SODERBERG HAROLD J
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

SODERMAN ANTHONY
152 S PLAZA BLDG
MPLS MN
55416

STANSFIELD ARLENE LAND OLKS
PO BOX 116
MPLS MN
55440

STATE BD.BARBER EXAMINERS
555 WABASHA
ST PAUL MN
55102

STATE BD VETERINARY EXAMINER
C/O DR A C SPANNAUS DVM
WACONIA MN

STD AM LIFE & ANNUITY CO
3801 W 50TH ST
MPLS MN
55410

STEELWORKERS CREDIT UNION
BOX 290
BRADITT MN
55706

STENSLAND M.E. PRES. MVMA
203 NW 22ND ST.
AUSTIN MN
55912

STOLPESTAD BROWN & SMITH
1550 NW BK BLDG
ST PAUL MN
55101

STUPKA & MOREM
MIDTOWN BLDG
AUSTIN MN
55912

SULLIVAN J KIRK
PO BOX 200
BOISE ID
83701

SUMMIT NATL BANK D L MORRILL
205 AURORA AVE
ST PAUL MN
55103

SUSSEL CO.ATTN:TED SCHWENKER
1650 COMO AVE.
ST PAUL MN
55108

SWANSON BURT E
W-2162 1ST NATL BK BLDG
ST PAUL MN
55101

SWANSON DALE
P O BOX 339
FOREST LAKE MN
55025

SWANSON GERALD H
212 CITY HALL
ROCHESTER MN
55901

SWEITZER R L HONEYWELL INC
2701 4TH AVE S
MPLS MN
55406

TATE VERN 3M CO
3M CENTER 220/6W
ST PAUL MN
55101

THOMPSON CONRAD
1107 23RD ST NW
ROCHESTER MN
55901

THOMPSON HESSIAN ET AL
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

TIMESAVERS INC ATT R S VO
5270 HANSON COURT
MPLS MN
55422

TOUCHE ROSS & CO K H STOCKE
700 NORTHSTAR CNTR
MPLS MN
55402

TWIN CITY RETAIL DRUGGIST AS
2388 UNIV AVE
ST PAUL MN
55104

UNION STOCK YARDS
ATTN PRES
SO ST PAUL MN
55075

VAN CLEVE JOHN H
2101 HENN AVE
MPLS MN
55405

VAN DRAKE STEPHEN R
BOX 353
PELICAN RAPID MN
56572

VAN EVERA MUNDT ET AL
700 TORREY BLDG
DULUTH MN
55802

VERRILL JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN

VILLAGE OF WOODBURY-F.STRONG
561 TOWER DRIVE
NEWPORT MN

VOLDNESS PERRY
105 6TH & MARQUETTE
MPLS MN

VOSS REV GORDON O
11120 NE 7TH ST
BLAINE MN

[illegible] JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN
55812

VILLAGE OF WOODBURY-F.STRONG
561 TOWER DRIVE
NEWPORT MN
55055

VOLDNESS PERRY
105 8TH & MARQUETTE
MPLS MN
55402

VOSS REV GORDON C
11120 NE 7TH ST
BLAINE MN
55434

VOS LEROY
2137 BURNS AVE
ST PAUL MN
55119

WALO JEAN
5746 SANDER DR
MPLS MN
55417

WALIGORA ROBERT
3228 SO 17TH AVE
MPLS MN
55407

WALTERS THOS H
4910 W 77TH ST STE 235
MPLS MN
55435

WANGLIST ALLEN
RM 292 FEDERAL BLDG
ST PAUL MN
55101

WELK G V NORTHERN STATES
414 NICOLLET MALL
MPLS MN
55401

WESTIN CHAS W
220 MEDICAL ARTS BLDG
DULUTH MN
55802

WHITING RALPH
555 WABASHA SUITE 204
ST PAUL MN
55102

WHITLOCK A G
ECON LAB OSBORN BLDG
ST PAUL MN
55102

WILCOX J PATRICK
1220 NORTHERN FED BLDG
ST PAUL MN
55102

WM.MITCHEL COLLEGE LAW LI
2100 SUMMIT AVE.
ST.PAUL MN
55105

WILEY ENTERPRISES
101 5TH AVE SE
[illegible] MN
55369

WILSON R GARY PPG INDUSTR
1 GATEWAY CENTER
PITTSBURGH PA
15222

WIS FEEDER PIG MARKET CO-OP

FRANCIS CREEK WI

WOLKERSTORTER THEODORE
676 17TH AVE NW
NEW BRIGHTON MN
55112

WOZNIAK E D
401 FIRST FED BLDG
ST PAUL MN
55101

WYANT CLINTON W ATTY

ATKIN MN
56431

NAME	ADDRESS	STREET	CITY	ZIP CODE
MOFFITT R C	RM 301 M	MPLS CITY HALL	MPLS	MN 55415
RENQUIST ARTHUR NSP CO	414 NICOLLET MALL		MPLS	MN 55401
BECK PAT	953 HYACINTH AVE		ST PAUL	MN 55106
BROWN H D	4961 KINGSBERRY LANE		MINNETONKA	MN 55343
NEREN MADONNA	376 NEAL AVE S		AFTON	MN 55001
REAGAN MICHAEL [illegible]	C/O MINN LEARNING CTR		BRAINERD	MN 56401
HOUSE RESEARCH	RM 57 STATE CAPITOL		ST PAUL	MN 55155

HEALTH

Abrahamson, Dr. Dean E., 243 Space Science Center, Minneapolis 55455

Booth Cold Storage Co., St.Peter & Kellogg, St. Paul
Branson, Lindley S., 300 Roanoke Bldg., Mpls. 55402
Bush, John T., Box 611, Mayo Bldg., U of M.,Mpls. 55455

Cassel, Dr. Carl V. E., Minn. State Dental Ass'n., 2236 Marshall Av.,St.Paul55104

Deephaven Montessori School, Inc.,188 So. Circle A Dr., Wayzata, Mn. 55391

Environment Reporter, 1231 25th St., N.W., Washington D. C.

Hawley, Lyle, Graco, PO Box 1441, Mpls. 55440

Houghton, Charles, Vendo, 7246 Troost Ave., Kansas City, Miss. 64131

Higgins, J.C.,Brotherhood Rwy. Clerks, 2317 W. 7th St., Duluth

Janke, John R., Burger Chef Systems,Inc.,250 No. St., White Plains, NewYork10625

Kurtz, Mrs.Kirsten,Mn. Nurses Ass'n.,1821 Univ.Ave., St.Paul 55104

Markham,B.B., 2250 IDS Center, 80 So. 8th St.,Mpls.55402

Merck & Co., Inc. Rahway, N.J., Attn; Off of Gen. Counsel

Minneapolis & Hennepin County Mental Health Clinic, 619 S. 5th St., Mpls.55415

Minn. Nurses Assn., Attn: Geraldine Wedel, 1821 Univ. Ave. Rm. 152,St.Paul 55104

Minn. State Pharmaceutical Ass'n., 2388 University Av.,St. Paul 55104

Parke, Davis & Company, P.O.Box 118, Detroit [illegible], Michigan 48120

Patrick, Peter, 101 Central Av., S.E.,Mpls.55414

Perso, E. R., 4411 Branson St.Mpls.55424

Planning and Advisory Comm. of Crow Wing County, Court House,Brainerd 56401

Roesler, Immanuel F., 6700 Portland Av.So., Richfield 55423

Schneider, Dorothy, StPaul Bur.Health, 555 Cedar St,St.Paul 55101

Walgreen, J.E.Krahulec, 4300 Peterson, Ave.Chicago,Ill.60646

DIV. OF ENVIRONMENTAL SANITATION

U.S. Soil Conservation Serv.,517 Red.Courts Bldg.,St.Paul (Swimming pools)

HOTELS, RESORTS, RESTAURANTS

U.S.Soil Conservation Serv., 517 Red.Courts Bldg.,St. Paul (trailer Parks,etc)

MINN. PLUMBING CODE ONLY

Hendricks, Manley, % Tyler Pipe Industries, Box 2027, Tyler, Texas 50701

Higgins, Robert G. - Room 300B, 1409 Willow St.,Mpls. 55403

Sharp, Richard H., 964 W. Cecil St.,Neenah, Wisc. 54956

CEMETERIES

Fox, Howard - 244 Dayton Ave.,St. Paul 55102

HEALTH

Abrahamson, Dr. Dean E., 243 Space Science Center, Minneapolis 55455

Booth Cold Storage Co., St.Peter & Kellogg, St. Paul

Branson, Lindley S., 300 Roanoke Bldg., Mpls. 55402

Bush, John T., Box 611, Mayo Bldg., U of M.,Mpls. 55455

Cassel, Dr. Carl V. E., Minn. State Dental Ass'n., 2236 Marshall Av ,St.Paul 5510

Deephaven Montessori School, Inc.,188 So. Circle A Dr., Wayzata, Mn. 55391

Environment Reporter, 1231 25th St., N.W., Washington D. C.

Hawley, Lyle, Graco, PO Box 1441, Mpls. 55440

Houghton, Charles, Vendo, 7246 Troost Ave., Kansas City, Miss. 64131

Higgins, J.C.,Brotherhood Rwy. Clerks, 2317 W. 7th St., Duluth

Janke, John R., Burger Chef Systems,Inc.,250 No. St., White Plains, NewYork10625

Kurtz, Mrs.Kirsten,Mn. Nurses Ass'n.,1821 Univ.Ave., St.Paul 55104

Markham,B.B., 2250 IDS Center, 80 So. 8th St.,Mpls.55402

Merck & Co., Inc. Rahway, N.J., Attn; Off of Gen. Counsel

Minneapolis & Hennepin County Mental Health Clinic, 619 S. 5th St., Mpls.55415

Minn. Nurses Assn., Attn: Geraldine Wedel, 1821 Univ. Ave. Rm. 152,St.Paul 5510

Minn. State Pharmaceutical Ass'n., 2388 University Av.,St. Paul 55104

Parke, Davis & Company, P.O.Box 118, Detroit , Michigan 48120

Patrick, Peter, 101 Central Av., S.E.,Mpls.55414

Perso, E. R., 4411 Branson St.Mpls.55424

Planning and Advisory Comm. of Crow Wing County, Court House,Brainerd 56401

Roesler, Immanuel F., 6700 Portland Av.So., Richfield 55423

Schneider, Dorothy, StPaul Bur.Health, 555 Cedar St,St.Paul 55101

Walgreen, J.E.Krahulec, 4300 Peterson, Ave.Chicago,Ill.60646

DIV. OF ENVIRONMENTAL SANITATION

U.S. Soil Conservation Serv.,517 Red.Courts Bldg.,St.Paul (Swimming pools)

HOTELS, RESORTS, RESTAURANTS

U.S.Soil Conservation Serv., 517 Red.Courts Bldg.,St. Paul (trailer Parks,etc)

MINN. PLUMBING CODE ONLY

Hendricks, Manley, % Tyler Pipe Industries, Box 2027, Tyler, Texas 50701

Higgins, Robert G. - Room 300B, 1409 Willow St.,Mpls. 55403

Sharp, Richard H., 964 W. Cecil St.,Neenah, Wisc. 54956

CEMETERIES

Fox, Howard - 244 Dayton Ave.,St. Paul 55102

Exhibit B

HEALTH

Health Central, Inc. 2810 57th Avenue No., Mpls 55455 Attn: Robert Van Hauer

Robert Will, Supervisor, Radiation Control Unit, PO Box 178, Ms-50-3 Seattle, Wash.

James Cherveny, Asst. Administrator, St. Mary's Hospital, Duluth, Mn. 55805

Dr. Robert E. McDonnell, Sec. Minn. State Bd. For Dentistry, 717 Delaware St. #338 Minneapolis, Minnesota 55440

Dr. Charles F. McGuiggan, Dental Health Center, Marshall, Mn. 56258

Charles J. Wetter, D.D.S., President, Minnesota State Dental Assn. Suite 205 Kellogg Square, St. Paul, Mn.

Harold H. Brunn, M.D., President, Minnesota State Medical Assn. 375 Jackson St. Paul, Mn. 55101

Delano Dunn, D.P.M., President, Minnesota Podiatry Assoc. 1618½ White Bear Avenue St. Paul, Mn. 55106

B. S. Pomeroy, D.V.M., Minnesota Veterinary Assoc. U of M, College of Veterinary Medicine, St. Paul, Mn. 55101

Elio Hamre, D.C., Executive Director, Mn. Chiropractic Assoc. 7300 France Avenue South Suite 312, Mpls. Mn. 55435

Mr. Ben Hippe, Legal Department, Mayo Clinic Rochester Mn. 55901

Mr. George S. Michaelsen, Vice-Chairman, Profeasor Health Service, U of M Mpls. Mn. 55455

Mr. Robert G. Wissink, Chairman, Senior Health Physicist 3M Company, 3M Center, Building St. Paul, Minnesota 55101

Donn G. Mosser, M.D., Northwestern Hospital 810 East 27th Street Mpls. Mn. 55407

Donald E. Barber, Ph.D., Associate Professor W169 Health Service U of M, Mpls Mn. 55455

Alan L. Orvis, Ph.D., Radiological Safety Officer, Mayo Clinic Rochester, Mn. 55901

Francis A. Spurrell, D.V.M., Professor-Graduate Faculty in Genetics, Veterinary Obstetrics and Gynecology, C346 Veterinary Hospitals, U of M, St. Paul Minnesota 55101

R. J. Whiting, D.C. 1913 West Brunsville Crosstown, Burnsville, Mn. 55378

W. A. Wilcox, M.D., Representative, Minnesota Radiological Society, Inc. 5027 Bruce Place Mpls, Minn. 55378

Richard Woellner, M.D., Chairman, Committe on Pulmonary Diseases, St. Louis Park Medical Ce

Harold Brunn, Executive Secretary, Minnesota State Medical Assoc. 375 Jackson St. Paul, Mn 55101

Orwings W. Kincaid, M.D., President, The Minn. Radiological Society, Inc. 200 S.W. 1 Stree Rochester, Minnesota 55901

HEALTH

Mr. Robert Willmarth, Mutual Service Insurance, 15-13½ Avenue N.W., P.O. Box 6537 Rochester, Minn. 55901

Mrs. Bridget R. Coleman, Vice President 700 Linwood Avenue, St. Paul, Mn. 55105

George Arvidson, D.C., 1789 Alameda, St. Paul, Minnesota 55113

Mr. Patrick M. Daugherty, 3914 Bryant Avenue North, Mpls. Minnesota 55412

Mr. Theodore Garcia, Sisters of St. Benedict, Crookston, Minnesota 56716

Mr. Joseph Gitis, 650 Southgate office Plaza, Bloomington, Mn, 55437

Mrs. Elizabeth M. Kalisch, 5371 Hugo Road, White Bear Lake, Mn. 55110

Mr. Michael E. Keable, M.A., 909 6th Avenue North, St. Cloud, Mn. 56301

John William Lawrow, M.D., 4001 Stinson Blvd. N.E., Mpls. Mn. 55418

Mrs. Helen I. Lee, 1445 Salem Church Rd. Apt. 303, Inver Grove Heights, Mn. 55075

Mr. Burton D. Magnuson, B.S. Pharm. Magnuson Lakeside Pharmacy, 4507 East Superior Street Duluth, Mn. 55804

Valentine O'Malley, M.D., 942 Lowry Medical Arts Bldg., St. Paul, Mn. 55102

Arlen Simi, D.D.S., 101 Medical Arts Bldg., St. Cloud, Mn. 56301

Mr. John H. Westerman, M.H.A., U of M Hospitals, 412 Union St. S.E. Box 604, Mpls, Mn. 55455

Mrs. Roberta W. Williamson, R.N., 2021 Bluestone Lane, Eagan, Mn. 55122

Warren R. Lawson, M.D., M.P.H., Minn. Dept of Health, 717 Delaware St. S.E. Mpls, Mn. 55440

Bernard M. Flavhan, D.D.S. Dept of Health, 717 Delaware St. S.E. Mpls, Mn. 55440

STATE OF MINNESOTA)
)ss.
COUNTY OF HENNEPIN)

In the Matter of Proposed Amendments to MHD 181 Relating to the Limitation of the Use of X-ray Machines in Screening for the Detection and Evaluation of Health Conditions

AFFIDAVIT OF MAILING

MARY JO WAMBACH, being first duly sworn, deposes and says:

That on the 15th day of September, 1975, at the City of Minneapolis, County of Hennepin, State of Minnesota, she served the attached Notice of Hearing by depositing in the United States mail at said City of Minneapolis, a true and correct copy thereof, properly enveloped, with postage prepaid, to:

American Health Profiles, Inc.
4303 Harding Road
Nashville, Tenn. 37205

Mary Jo Wambach
Mary Jo Wambach

Subscribed and sworn to before me this 22nd day of October, 1975.

Christine A. Kuderka

CHRISTINE A. KUDERKA
Notary Public, Ramsey County, Mn.
My Commission Expires, Nov. 4, 1978

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA

STATE BOARD OF HEALTH

In the Matter of Proposed
Amendments to MHD 181 Relating
to the Limitation of the Use of
X-Ray Machines in Screening for
the Detection and Evaluation of
Health Conditions

NOTICE OF HEARING

Notice is hereby given that a public hearing will be held pursuant to Minn. Stat. §§ 15.0412 subd. 4 (1974), as amended by Minn. Laws 1975, ch. 380, in the above-entitled matter, in the Board Room, Minnesota Department of Health Building, 717 Delaware Street S.E., Minneapolis, Minnesota, on October 24, 1975, commencing at 9:00 A.M., and continuing until all representatives or other interested groups of persons have had an opportunity to be heard concerning adoption of the proposed amendment captioned above by submitting either oral or written data, statements, or arguments. Statements or briefs may be submitted without appearing at the hearing.

Under Minn. Stat. §§ 10A.01 subd. 11 (1974), any individual representing persons or associations attempting to influence administrative action, such as promulgation of these proposed amendments, must register with the State Ethics Commission as a lobbyist within five days of the commencement of such activity by the individual. The State Ethics Commission is located at 410 State Office Building, St. Paul, Minnesota 55155.

The Minnesota State Board of Health proposes to amend Minn. Rule MHD 181 (b), Definitions, and MHD 181 (h), Restrictions. The proposed amendments are attached hereto and made a part hereof. Additional copies of the proposed amendments are now available and may be obtained by writing to the Minnesota Department of Health, Division of Environmental Health, Radiation Control Section, ATTN: Alice Dolezal, 717 Delaware Street S.E., Minneapolis, Minnesota 55440. Additional copies will be available at the door on the date of the hearing.

The proposed rules in MHD 181 (h)(2)(ee)(ii) adopt by reference two studies of the U.S. Department of Health, Education and Welfare entitled "Population Exposure to X-Rays U.S. 1970" (DHEW Publication (FDA) 73-8047, November 1973) and "National Evaluation of X-Ray Trends: Tabulation of Data for 'All States' for Period January 1, 1974 to December 31, 1974". These studies are available for review at the Minnesota Department of Health Building, address as above, or may be obtained by writing to: Public Information Officer HFX-25, Department of Health, Education and Welfare, Public Health Service, Food and Drug Administration, Bureau of Radiological Health, 5600 Fishers Lane, Rockville, Maryland 20852.

A copy of the procedural rules for the hearing is attached and made a part hereof.

Testimony or other evidence to be submitted for consideration should be pertinent to the matter at hand and may be presented either orally or in writing at the public hearing or by mailing a statement to the Secretary and Executive Officer of the Board at the Department of Health Building, address as above. If the person submitting a statement cannot be present to read his statement at the time of the

hearing, the statement will be entered into the record. For those wishing to submit written statements or exhibits, it is requested that at least three (3) copies of such statement, exhibit or summary be furnished at the hearing. The record will remain open for receipt of briefs or other written material relative to the proposed rules for twenty (20) days subsequent to the public hearing.

It is suggested that to save time and avoid duplication, those organizations or associations having a common viewpoint or interest in these proceedings join together where possible and present a single statement in behalf of such interests.

Dated: September 12, 1975

STATE OF MINNESOTA

BOARD OF HEALTH

/S/ WARREN R. LAWSON, M.D.
WARREN R. LAWSON, M.D.
Secretary and Executive Officer

MINNESOTA STATE BOARD OF HEALTH

PROCEDURAL RULES FOR HEARING

The purpose of the hearing is to allow interested parties to express their views and present facts bearing upon the proposed regulations. So as to provide for an orderly presentation of evidence, the following rules will be in effect during the hearing specified in the attached Notice of Hearing:

1. Anyone wishing to be heard should indicate by signing the speaking sheet, listing his name, address, and the group which he represents. The speaking sheet will be available at the main entrance to the hearing room. It is requested that each group select one speaker only to present its views.

2. The first time the witness makes a statement he should spell his name and identify the group he is representing. Prior to making any subsequent statements he should state his name and group which he represents. He may be sworn upon his request but it is not required. If he elects not to be sworn, that may be considered in determining the weight to be given to his testimony.

3. By giving testimony, a witness, including one who may also be a member of the panel, subjects himself to questioning by the panel. However, he is subject to cross-examination by non members of the panel only if he affirmatively consents to being so examined. A refusal to be cross-examined may be considered in determining the weight to be given to his testimony.

4. All parties interested in introducing any written matter may do so by having it marked as an exhibit and then introduced for the record. Unsworn written matter may be received, but the fact that it is unsworn may be considered in determining the weight to be given it.

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA

STATE BOARD OF HEALTH

In the Matter of Proposed Amendments to MHD 181 Relating to the Limitation of the Use of X-Ray Machines in Screening for the Detection and Evaluation of Health Conditions

STATEMENT OF NEED

The above-captioned rule is an amendment to existing rules of the State Board of Health. The last time the above-captioned rule was amended was in September, 1971. The statutory authority for this rule is Minn. Stat. § 144.12(15) (1974).

The need to adopt this regulation is based upon several factors. First, there is an increased concern about exposure of the population to ionizing radiation. Radiation exposure at any level is considered to involve some risk. Since there is a certain amount of radiation to which all people are exposed through their environment in addition to the exposure that is received through diagnostic or treatment x-rays ordered by a licensed healing arts practitioner, it is imperative to eliminate insofar as is practically possible all unnecessary exposures. Screening by x-ray is best known for its use in detecting tuberculosis. However, x-ray screening of the general population to discover this disease is no longer productive. The total number of new cases had decreased significantly since the screening program was initiated so that the radiation exposure is no longer justified. Of principle significance here, as with all other reasons

for x-ray screening, is that improvements in technology have resulted in the development of other diagnostic techniques for detecting adverse health conditions (not just limited to tuberculosis) which do not involve or greatly reduce radiation exposure.

The proposed amendments to MHD 181 (h) are needed at the present time to prevent the use of x-ray units, both mobile and stationary, from being utilized as a screening technique when other means of testing for health conditions are available which impose less potential risk to the individual unless there is a demonstrated health need for x-ray screening, the health benefits of which will outweigh the risks of radiation exposure. The proposed rule will protect the public from being exposed to unnecessary amounts of radiation from x-ray screening. This protection will result from the elimination of x-ray screening when it is not demonstrated to be beneficial to the public health. On the other hand, when screening is justified, the proposed amendment will assure that the radiation exposure will be the minimum necessary to achieve the screening goal.

STATE OF MINNESOTA

BOARD OF HEALTH

WARREN R. LAWSON, M.D.
Secretary and Executive Officer

Dated: September 9th, 1975.

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA

STATE BOARD OF HEALTH

In the Matter of Proposed Amendments to MHD 181 Relating to the Limitation of the Use of X-Ray Machines in Screening for the Detection and Evaluation of Health Conditions

APPOINTMENT

David Giese is hereby appointed to serve as hearing officer on behalf of the State Board of Health in the above-captioned matter, said hearing to be held on October 24, 1975, and continuing until all representatives of associations or other interested groups or persons have had an opportunity to be heard.

This appointment is made pursuant to the following authority: resolution of the State Board of Health adopted at its duly constituted meeting held on August 14, 1975.

STATE OF MINNESOTA

BOARD OF HEALTH

WARREN R. LAWSON, M.D.
Secretary and Executive Officer

Dated: September 9th, 1975.

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA

STATE BOARD OF HEALTH

In the Matter of the Proposed Adoption, Amendment or Revision of the Rules of the Minnesota State Board of Health.

NOTICE OF INTENT TO OBTAIN INFORMATION ON PROPOSED RULES FROM NON-AGENCY SOURCES

NOTICE IS HEREBY GIVEN, pursuant to the provisions of Minnesota Laws 1975, Chapter 380, section 2, subdivision 6, that the Minnesota State Board of Health will propose the adoption of new rules on the subjects noted below (items A through G) and the amendment and revision of the existing rules noted below (items H through K).

All interested parties desiring to submit data or views relating to the proposed adoption, amendment or revision of the rules noted below should address their comments (either written or oral) to the Minnesota Department of Health (717 Delaware Street S.E., Minneapolis, Minnesota 55440) by writing or calling the persons designated. Any evidence submitted for consideration should be pertinent to the matter at hand. Any written material received by the Department of Health will become part of the hearing record.

A. Rules implementing the provisions of Minnesota Laws 1975, Chapter 211, also known as the Minnesota Clean Indoor Air Act.

Contact: Kent Peterson
Phone: (612) 296-5365

B. Rules relating to the control and regulation of clinical laboratories.

Contact: Division of Medical Laboratories
Attn: Dr. Henry Bauer
Phone: (612) 296-5241

C. Rules relating to the transfer of patient's x-ray records.

Contact: Dr. Ellen Z. Fifer
Assistant Commissioner for Programs
Phone: (612) 296-5391

D. Rules relating to the distribution of monies to aid in the construction of water filtration and purification plants and systems for those communities using Lake Superior as a drinking water source under the state grant program established by Minn. Laws 1975, Chapter 437, Art. XI, §2, subd. 2.

Contact: Division of Environmental Health
Attn: Fred Heisel
Phone: (612) 296-5320

E. Rules implementing the provisions of Minnesota Laws 1975, Chapter 346, also known as the Maternal and Child Nutrition Act of 1975.

Contact: Division of Personal Health Services
Section of Maternal and Child Health
Attn: Dr. Ronald Campbell
Phone: (612) 296-5265

F. Rules relating to the approval of laboratories performing bacteriological examinations of water.

Contact: Division of Environmental Health
Analytical Services Section
Attn: Russell Frazier
Phone: (612) 296-5300

G. Rules relating to the establishment of application procedures for the credentialing of allied health manpower groups.

Contact: Section of Allied Health Manpower
Attn: Corrine Larson
Phone: (612) 296-5393

H. MHD 44-71, Rules of the Minnesota State Board of Health for the construction, equipment, maintenance, operation and licensing of nursing homes and boarding care homes, and for the establishment of levels of assessments for violations of the regulations.

Contact: Division of Health Facilities
Attn: H. Michael Tripple
Phone: (612) 296-5294

I. MHD 76-116, Rules of the Minnesota State Board of Health for the construction, equipment, maintenance, operation and licensing of hospitals, and for the establishment of levels of assessments for violations of the regulations.

Contact: Division of Health Facilities
Attn: Janet Brodahl
Phone: (612) 296-5440

J. MHD 21-35, Rules of the Minnesota State Board of Health relating to Morticians, Funeral Directors, and the Disposition of the Dead.

Contact: Mortuary Science Unit
Attn: Eugene Larson
Phone: (612) 296-5491

K. MHD 181, Rule of the Minnesota State Board of Health relating to the limitation of the use of x-ray machines in the screening for detection and evaluation of health conditions.

Contact: Division of Environmental Health
Attn: Alice Dolezal
Phone: (612) 296-5323

Any materials submitted shall be reviewed and considered by the Department of Health during the preparation of the proposed rules. Notice of the public hearing on the proposed rules shall be given to all interested parties in accordance with the provisions of the Administrative Procedures Act.

Under the provisions of Minn. Stat. § 10A.01, subd. 11 (1974), any individual representing persons or associations attempting to influence administrative action, such as the promulgation of these proposed rules, must register with the State Ethics Commission as a lobbyist within five days of the commencement of such activity by the individual. The State Ethics Commission is located at Room 401, State Office Building, Saint Paul, Minnesota 55155.

Dated: August 20th, 1975

STATE OF MINNESOTA

BOARD OF HEALTH

WARREN R. LAWSON, M.D.
Secretary and Executive Officer

STATE OF MINNESOTA

COUNTY OF HENNEPIN

In the Matter of the Proposed Adoption, Amendment, or Revision of the Rules of the Minnesota State Board of Health

AFFIDAVIT OF MAILING

Janis Baz, being first duly sworn, deposes and says:

That on the 29th day of August, 1975, at the City of Minneapolis, County of Hennepin, State of Minnesota, S he served the attached Notice of Intent to Obtain Information on Proposed Rules from Non-Agency Sources by depositing in the United States mail at said City of Minneapolis, a true and correct copy thereof, properly enveloped, with postage prepaid, to all persons and associations at the addressess listed on the Certificate of the Secretary of State attached and made a part hereof as Exhibit A, as well as to all members of the Minnesota Legislature as of the date of mailing.

Janis Baz

Subscribed and sworn to before me this 29th day of August, 1975.

Marie B. Tromiczak

MARIE B. TROMICZAK
NOTARY PUBLIC - MINNESOTA
HENNEPIN COUNTY
My Commission Expires Oct 9, 1980

STATE OF MINNESOTA

COUNTY OF RAMSEY

In the Matter of the Proposed
Adoption, Amendment, or
Revision of the Rules of the
Minnesota State Board of Health.

CERTIFICATE

I hereby certify that the 437 general labels and 1 sheet list for the Minnesota State Health Department all of which are attached and made a part hereof, constitute the complete lists of persons, associations, and other interested groups who as of 11:30 O'clock A.M., this 25th day of August, 1975, have requested pursuant to Minn. Stat. ss 15.0412 subd. 4 (1971), that their names be placed on file with the Secretary of State for the purpose of receiving notice of public hearing on proposed rules on the subject captioned above.

Joan Anderson Growe
SECRETARY OF STATE

JOAN ANDERSON GROWE

By Ceil Dunn

STATE OF MINNESOTA

COUNTY OF HENNEPIN

In the Matter of the Proposed Adoption, Amendment or Revision of the Rules of the Minnesota State Board of Health

AFFIDAVIT OF MAILING

H. Michael Tripple, being first duly sworn, deposes and says:

That on the 17th day of September, 1975, at the City of Minneapolis, County of Hennepin, State of Minnesota, he mailed the attached Press Release by depositing in the the United States mail at said City of Minneapolis, a true and correct copy thereof, properly enveloped, with postage prepaid, to all persons and associations at the addresses listed on Exhibit A, attached and made a part hereof.

H. Michael Tripple

Subscribed and sworn to before me this 15th day of ~~September~~ October, 1975.

John E. Diehl

JOHN E. DIEHL
Notary Public, Ramsey County, Minn.
My Commission Expires
September 20, 1978

YOUR HEALTH

NEWS RELEASE FROM THE MINNESOTA DEPARTMENT OF HEALTH

September 16, 1975 Contact: Bill Moore
FOR IMMEDIATE RELEASE (612) 296-5294

The State Board of Health has announced its intent to obtain the input of Minnesota residents as it considers the adoption of new rules in seven different subject areas and the amendment and revision of existing rules in five different areas.

Minnesotans interested in submitting data or views relating to the proposed adoption, amendment or revision of rules should address their written or oral comments to the Minnesota Department of Health, 717 S.E. Delaware St., Minneapolis 55440, through the contact persons listed below.

The proposed new rules relate to the following subjects:

* Implementing provisions of the Minnesota Clean Indoor Air Act; Kent Peterson, (612) 296-5365.

* Control and regulation of clinical laboratories; Dr. Henry Bauer, Division of Medical Laboratories, (612) 296-5241.

* Transfer of patient's x-ray records; Dr. Ellen Z. Fifer, Assistant Commissioner for Programs, (612) 296-5391.

* Distribution of monies to aid in construction of water filtration and purification plants and systems for communities using Lake Superior as a drinking water source; Frederick Heisel, Division of Environmental Health, (612) 296-5320.

* Implementing provisions of the Maternal and Child Nutrition Act of 1975; Dr. Ronald Campbell, Section of Maternal and Child Health, (612) 296-5265.

* Approval of laboratories performing bacteriological examinations of water; Russell Frazier, Analytical Services Section, (612) 296-5300.

- MORE -

* Establishment of application procedures for the credentialing of allied health manpower groups; Corrine Larson, Section of Allied Health Manpower, (612) 296-5393.

Amendments or revisions of existing rules are proposed in the following subject areas:

* Construction, equipment, maintenance, operation and licensing of nursing homes and boarding care homes, and the establishment of levels of assessments for violations of the regulations; H. Michael Tripple, Division of Health Facilities, (612) 296-5418 (effective Oct. 1).

* Construction, equipment, maintenance, operation and licensing of hospitals, and the establishment of levels of assessments for violations of the regulations; Janet Brodahl, Division of Health Facilities, (612) 296-5440.

* Morticians, funeral directors, and the disposition of the dead; Eugene Larson, Mortuary Science Unit, (612) 296-5491.

* Limitation of the use of x-ray machines in the screening for detection and evaluation of health conditions; Alice Dolezal, Division of Environmental Health, (612) 296-5323.

* Construction, equipment, maintenance, operation and licensure of supervised living facilities; Hans Larsen, Division of Health Facilities, (612) 296-5451.

Any materials submitted will be reviewed and considered by the Department of Health during the preparation of proposed rules, amendments or revisions. Notice of public hearings on proposed rules will be given to all interested parties, and any written materials submitted will become part of the hearing record.

Under state law, any individual representing persons or associations attempting to influence administrative action, such as the promulgation of these proposed rules, must register with the State Ethics Commission as a lobbyist within five days of the commencement of such activity.

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BENSON, MN 56215

STEVENS CO PHN SERVICE 72
STEVENS COUNTY COURT HOUSE
500 COLORADO, P.O. BOX 404
MORRIS, MN 56267

STEELE CO PHN SERVICE 72
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OWATONNA, MN 55060

STEARNS CO PHN SERVICE 72
BOX 153
ST. CLOUD, MN 56301

Gretchen Wallen 74
Washington County Mental
Health Center
3430 Hudson Road
Lake Elmo, MN 55042

Marilyn Weatherman 74
Washington County PHN Service
939 W. Anderson
Stillwater, MN 55082

Deloris O. Ballin 72
Ext. Home Economist
U.S. Department of Agriculture
University of Minnesota
Litchfield, MN 55355

Robert Willmarth 73
Mutual Service Insurance
15 - 13½ Ave. N.W.
P. O. Box 6537
Rochester, MN 55901

Roberta Williamson, R.N. 74
2021 Bluestone Lane
Eagan, MN 55122

Mr. Joseph Gitis 74
Gold Medallion Nursing Centers
650 Southgate Office Plaza
Bloomington, MN 55437

Burton D. Magnuson 73 Exhibit 4
Magnuson Lakeside Pharmacy
4507 E. Superior Street
Duluth, MN 55804

Michael E. Keable 73
909 - 6th Avenue North
St. Cloud, MN 56301

John W. Lawrow, M.D. 71
4001 Stinson Blvd.
Minneapolis, MN 55418

Elizabeth Kalisch 73
5371 Hugo Road
White Bear Lake, Minn. 55110

Patrick Daugherty 73
3914 Bryant Ave. No.
Minneapolis, Minn. 55412

Mrs. Bridget Coleman 73
700 Linwood Avenue
St. Paul, Minn. 55105

Valentine O'Malley 72
942 Lowry Medical Arts Bldg.
St. Paul, MN 55102

Mr. John H. Westerman 72
University of Minnesota Hospital
Box 604
Minneapolis, MN 55455

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BUFFALO, MN 55313

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BRECKENRIDGE, MN 56520

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COURTHOUSE
RED LAKE FALLS, MN 56750

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555 CEDAR STREET
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P. O. BOX 193
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COURTHOUSE
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[illegible] CO PHN SERV 72
929 W ANDERSON
STILLWATER, MN 55082

WASECA CO PHN SERVICE 72
301 N STATE ST-COURTHOUSE
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415 SO JEFFERSON
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CLOQUET PINE KNOT-NEWS GRAPHIC
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News Director 72
Radio Station KEWB
P. O. Box 7-650
St. Paul, MN 55110

News Director 71
RADIO STATION KTIS
Northwestern College
Roseville, Minnesota 55113

News Director
WYOO Radio 72
6425 Nicollet Avenue
Minneapolis, MN 55423

News Director 71
WDGY RADIO STATION
P. O. Box 20026
Minneapolis, Minnesota 55420

News Director 71
Radio Station KCCO
625 Second Avenue South
Minneapolis, MN 55404

News Director 73
Radio Station WAYL
3470 Highway 8
New Brighton, MN 55112

News Director 72
Radio Station KDAN
3092 Military Rd.
Newport, MN 55055

News Director 71
Radio Station KQRS
917 N. Lilac Drive
Minneapolis, MN 55422

News Director 71
Radio Station KSTP
3800 Minnehaha Avenue
Minneapolis, MN 55406

News Director 72
KBEM Radio
1101 - 3rd Avenue South
Minneapolis, MN 55415

News Director
KANO
Anoka, Minnesota 55303 60

PH/E
Newsreaders

330 East Superior Street
Duluth, MN 55802

News Director 71
WDAL-TV
325 W. Superior St.
Duluth, MN 55802

News Director 71
KAUS-TV
Box 577
Austin, MN 55912

Mr. Kent Colby 73
Public Service Director
KAUS-TV Austin-Albert Lea
Highway 105 South
Austin, MN 55912

News Director
KCMT-TV
Alexandria, Minnesota 61

News Director 69
WCCO-TV
50 South 9th St.
Minneapolis, Minnesota 55402

News Director 69
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2925 Dean Blvd.
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News Director
KMSP-TV
6975 York Avenue South
Minneapolis, MN 55435 74

News Director
KSTP-TV
3415 University Avenue
St. Paul 14, Minnesota 55114 61

News Director 72
KTCA-TV
1640 Como Avenue
St. Paul, MN 55108

News Director 74
KRSI Radio Station
11320 Valley View Road
Eden Prairie, MN 55343

News Director 71
Radio Station KSEM
Box 66
Shakopee, MN 55379

News Director 69
Radio Station WSTC
609 - 2nd Ave. So.
Minneapolis, Minn. 55402

News Director 66
WRCR
498 Century Avenue So.
St. Paul, Minn. 55119

News Director 69
KSTP Radio
3415 University Ave.
St. Paul, Minn. 55114

News Director 73
KSJN Radio
400 Sibley Street
St. Paul, MN 55101

News Director 72
KEEY Radio
611 Frontenac Place
St. Paul, MN 55104

James E. Trow, M.D. 72
Health Officer
Richfield Health Department
6700 Portland Avenue South
Richfield, MN 55423

George N. Ryegaard, M.D. 72
County Health Officer
Rice County Health Department
Medical Arts Bldg.
Northfield, MN 55057

C. A. Smith, M.D. 72
Commissioner of Health
Minneapolis Health Department
250 South 4th Street
Minneapolis, MN 55415

R. A. MacDonald, M.D. 72
Health Officer
Cook County Board of Health
Grand Marais, MN 55604

Alice K. Brill, M.D. 72
Health Officer
Bloomington Health Department
2215 West Old Shakopee Rd.
Bloomington, MN 55431

M. K. Plasha, M.D. 72
Health Officer
Anoka County Comprehensive Health
Dept., Courthouse
Anoka, MN 55303

News Director 71
KTHI-TV
Box 1878
Fargo, ND 58102

Program Director 72
KGLO-TV
2nd & Pennsylvania
Mason City, Iowa 50402

News Director 73
WDAY-TV
207 N. 5th St.
Fargo, ND 58102

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News Director 73
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News Director 72
American Cablevision Co.
117 East Center Street
Rochester, MN 55901

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KEYC-TV
Mankato, Minnesota 61

Willy Knutsen 72
Litchfield Cablevision
Box 460
Litchfield, MN 55355

News Director 71
KNMT-TV
Box 550
Hackensack, MN 56452

News Director 71
WDIO-TV
10 Observation Rd.
Duluth, MN 55811

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Campbell-Mithun, Inc.
Northstar Center
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Kerry Noyes
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50 South Ninth Street
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H. B. Leppink, M.D. 72
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Health Officer
St. Paul Bureau of Health
555 Cedar Street
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WSCR-FM Radio Station
125 West Superior St.
Duluth, MN 55802

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Rochester Community College
Radio Station
Rochester, MN 55901

Dr. Edith Leyasmeyer, Assoc. Dir.
Area Health Education Center 74
Suite 303, 2829 University Ave.
Minneapolis, MN 55414

Mrs. Shirley Hunt 73
Environmental Concerns, Inc.
111 East Franklin Avenue
Minneapolis, MN 55404

Marjorie Goss, Institution Nurse 73
Hennepin County Juvenile Center
1000 S. 6th Street
Minneapolis, MN 55415

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Detroit Lakes, MN 56501

Edward J. Dvorak 71
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University Campus
Minneapolis, MN 55455

Dr. Donald W. Cowan, Director 67
Student Health Service
University Campus
Minneapolis, MN 55455

Mrs. Shirley Hunt 73
Environmental Concerns, Inc.
111 East Franklin Avenue
Minneapolis, MN 55404

Mr. Thomas W. Hoban 72
Hennepin County Medical Society
2000 Medical Arts Building
Minneapolis, Minnesota 55402

Kay DeRoos
Community Univ. Health Care Center
2016 - 16th Avenue South
Minneapolis, MN 55404 74

Jackie Lovald 75
Western Community Action, Inc.
438 W. Main
Marshall, MN 56258

Mrs. Ruth Kuechenmeister
R.F.D. #1, Box 162
Lyla, MN 55953 74

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University of Minnesota
Litchfield, MN 55355

Robert Willmarth 73
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Rochester, MN 55901

Roberta Williamson, R.N. 74
2021 Bluestone Lane
Eagan, MN 55122

Mr. Joseph Gitis 74
Gold Medallion Nursing Centers
650 Southgate Office Plaza
Bloomington, MN 55437

Burton D. Magnuson 73
Magnuson Lakeside Pharmacy
4507 E. Superior Street
Duluth, MN 55804

Michael E. Keable 73
909 - 6th Avenue North
St. Cloud, MN 56301

John W. Lawrow, M.D. 71
4001 Stinson Blvd.
Minneapolis, MN 55418

Elizabeth Kalisch 73
5371 Hugo Road
White Bear Lake, Minn. 55110

Patrick Daugherty 73
3914 Bryant Ave. No.
Minneapolis, Minn. 55412

Mrs. Bridget Coleman 73
700 Linwood Avenue
St. Paul, Minn. 55105

Valentine O'Malley 72
942 Lowry Medical Arts Bldg.
St. Paul, MN 55102

Mr. John H. Westerman 72
University of Minnesota Hospital
Box 604
Minneapolis, MN 55455

Seymour Stark, Publisher 75
Communications for Health
P. O. Box A-G
Port Jeff. Sta., N.Y. 11776

Carlson Wade 75
12 East 41 Street, Rm. 707
New York, N.Y. 10017

National Public Relations Council
815 Second Ave. Room 500 72
New York, N.Y. 10017

Information Officer
Division of Research Grants
National Institutes of Health
Bethesda 14, Maryland 61

Editor
[illegible]
Herman, Minnesota

Editor
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Editor 67
OSSEO-MAPLE GROVE PRESS
Osseo, Minn. 55369

Editor
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Herman, Minnesota

Editor 72
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Osseo, MN 55369

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Oradell, NJ 07649

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BROOKLYN PARK NEWSLETTER
5800 - 85th Ave. North
Brooklyn Park, MN 55443

City Desk 72
THE FORUM
101 North Fifth Street
Fargo, N.D. 58102

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[illegible]
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Canby, Minnesota

Editor 70
TIMES
Monticello, Minnesota 55362

Gretchen Mullen 74
Washington County Mental
Health Center
3430 Hudson Road
Lake Elmo, MN 55042

Marilyn Weatherman 74
Washington County PHN Service
939 W. Anderson
Stillwater, MN 55082

Ray Neff, Prog. Asst. 73
Human Services Act
State Planning Agency
101 Capitol Square Bldg.
St. Paul, MN 55101

Larry Fredrickson 73
Room 28 State Capitol
St. Paul, MN 55155

Mr. Charles Fanning 69
Civil Defense Department
Veterans Service Building
St. Paul, Minnesota 55101

Jerry Dilts 73
c/o WHIN Radio
493 South Century Avenue
St. Paul, MN 55119

Commissioner 73
Dept. of Natural Resources
Centennial Office Bldg.
St. Paul, MN 55155

David Cummings 75
Director of Publicity
Dept. of Economic Development
480 Cedar St.
St. Paul, MN 55101

Charles Sandberg 73
Health Educator
Olmsted County Health Department
415 - 4th St. S.E.
Rochester, MN 55901

Miss Allegra Pofahl
Public Health Center
250 Fourth Street South
Minneapolis 15, Minnesota 55415 60

Mr. W. Perron Halverson 72
Consultant/Producer
Regional Telecommunications Center
Moorhead State College
Moorhead, MN 56560

Mr. M. C. Combs, Marketing
Specialist, State Dept. of
Agriculture, 540 State Office Bldg.
St. Paul, MN 55101

Assn. of Minnesota Counties 69
Suite 203
55 Sherburne Avenue
St. Paul, Minnesota 55103

Mr. Vince Bovitz
Dir. of Public Information 67
513 State Highway Bldg.
St. Paul, MN. 55101

Mrs. Del Nelson 74
Coordinating Nurse
John Glenn Junior High School
1560 E. County Rd. B
North St. Paul, MN 55109

Mrs. Ann Lein, R.N. 73
Moorhead Health Department
Box 779
Moorhead, MN 56560

Edward P. Schwartz
Ad Art Advertising Co.
2500 Louisiana Avenue North
Minneapolis, MN 55427

74

Mrs. Cathy Rebuffoni, Director
Public Relations
Minnesota Hospital Association
2533 University Avenue Southeast
Minneapolis, MN 55414 74

Mr. James G. Gleben 67
Assistant Service Officer
Veterans Service [illegible]
St. Paul, MN [illegible]

Mr. Irving Goldberg, Info. Dir.
Office of Communications 73
National Institute of Health
Building One, Room 309
Bethesda, MD 20014

Miss Christine Solomon
Pharmaceutical Manufacturers Assn.
1155 Fifteenth Street, N.W.
Washington, D.C. 20005

Mr. Walter Sternke, Sanitarian 72
Jackson-Nobles County Health Dept.
Box 184
Worthington, MN 56187

S. Gail Battista 74
The Bureau of National Affairs, Inc.
1231 25th Street, Northwest
Washington, D.C. 20037

Alice S. Keller 73
Environmental Quality Council
358 Collegeview
Winona, MN 55987

William S. L. Christensen 74
W.M.C., Inc.
General Contractors
P. O. Box 103
Winona, MN 55987

E. Francis Fitzgerald 73
916 Voc-Tech. Institute
3300 Century Avenue
White Bear Lake, MN 55110

Division of Dental Health
Public Health Service
U.S. Dept. of Health, Education & Welf.
Washington 25 D. C.

Kay Berg 74
Assistant Professor of Nursing
Gustavus Adolphus College
St. Peter, MN 56082

James L. Weber 73
Biology Department
Highland Park Senior High School
So. Snelling Ave. & Edgcumbe Rd.
St. Paul, MN 55116

Mrs. Timothy Vurm 73
Model Cities Health Center
270 North Kent
St. Paul, MN 55103

MINNESOTA PROGRESS 74
Dept. of Economic Development
480 Cedar St.
St. Paul, MN 55101

Minnesota Chiropractic Association
1935 W. County Road B2, Suite 224
St. Paul, MN 55113 73

Mr. Richard Nathey 70
Budget Examiner, Budget Division
Administration Building
St. Paul, Minnesota 55101

James Lee, Publications Dir.
Minnesota Dept. of Education
715 Capitol Square
550 Cedar
St. Paul, MN 55101 74

STATE OF MINNESOTA

DEPARTMENT HEALTH

Office Memorandum

TO : Addressograph Unit

DATE: Sept. 16, 1975

FROM : Section of Public Health Education

SUBJECT: News Release Additions

George Arvidson, D.C.
1789 Alameda
St. Paul, MN 55113 75

Mr. Theodore Garcia
Sisters of St. Benedict
Crookston, MN 56716 75

Mrs. Helen I. Lee
1445 Salem Church Rd.
Apt. 303
Inver Grove Heights, MN 55075 75

Arlen Simi, D.D.S.
101 Medical Arts Bldg.
St. Cloud, MN 56301 75

RAMSEY CO. PHN SERVICE
319 EAGLE STREET
ST. PAUL, MN 55102 75

CROW WING CO PHN SERVICE
COURT HOUSE
BRAINERD, MN 56401 75

SUBURBAN PHN SERVICE
West 201
8700 W. 36th Street
St. Louis Park, MN 55426 75

Abraham Kastenbaum
Ramar Building Suite 210
111 East Franklin Avenue
Minneapolis, MN 55404 75

Minnesota Department of Health
Central District
Westgate Shopping Center
Mezzanine, Box 38
2500 W. Division Street
St. Cloud, MN 56301 75

Dist. Rep., Minn. Dept. of Health
Central District
Westgate Shopping Center, Mezzanine
Box 38, 2500 W. Division St.
St. Cloud, MN 56301 75

News Director
Northern Community Radio
Box 474
Grand Rapids, MN 55744 75

BIG STONE CO PHN SERVICE
340 2ND ST NW
ORTONVILLE, MN 56278 75

Program Director
KX96 Stereo Radio
Box 960
Grand Rapids, Minnesota 55744 75

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Documentation for Amendment to Regulation MHD 181
Relating to Ionizing Radiation

The Minnesota Department of Health is concerned about eliminating unnecessary radiation exposure to Minnesota citizens. All ionizing radiation is considered as potentially hazardous. This is in accord with national and international radiation protection standards. Justification for permitting people to be exposed or deliberately exposing persons to ionizing radiation must be made in terms of benefit to the people so exposed. The International Commission of Radiological Protection states, "A basis of the Commission's recommendations is the cautious assumption that any exposure to radiation may carry some risk for the development of somatic effects, including leukemia and other malignancies and of hereditary effects. The assumption is made that down to the lowest levels of dose, the risk of inducing disease or disability increases with the dose accumulated by the individual. This assumption implies that there is no wholly 'safe' dose of radiation . . . However, in the absence of positive knowledge, the Commission believes that the policy of assuming a risk of injury at low doses is the most reasonable basis for radiation protection."[1] The National Council on Radiation Protection and Measurements has written "Dose limiting recommendations contain a criterion equivalent to requiring 'avoidance of appreciable bodily injury'. Necessary assumption of a non-threshold concept implies that some effect may occur at any dose."[2]

The National Academy of Sciences and the National Research Council in considering some principles underlying induction of somatic effects of exposure to radiation stated, "To specify numerically the risks of radiation effects under conditions of low-level exposure requires better knowledge than is now available of the mechanisms involved in the production of such effects, of their dose-response relationships, and of the susceptibility of human populations at risk. For none of the effects can the dose-response relationship be defined precisely over a wide range of dose and dose rate, and only for induction of certain types of effects, such as cataracts and impairment of fertility, are the mechanisms of induction known with some precision. For the most part, therefore, estimation of the risks of effects at low dose levels involves extrapolation observations at higher dose levels, based on assumptions about the nature of the dose-response relationship, the mechanisms involved, the susceptibility of the population at risk, and other factors"[3]

While exposure to radiation is assumed to entail a risk of deleterious effects, unless society wishes to dispense with activities involving exposure to ionizing radiation, it must recognize that there is a degree of risk and must limit the radiation dose to a level at which the risk is deemed to be acceptable to the individual and to society in view of the benefits derived from such activities. The Minnesota Department of Health is cognizant of potential benefits in the use of ionizing radiation, e.g., in medical diagnosis, and attempts to minimize the associated risk by eliminating unnecessary exposure. The U.S. Surgeon General has written in the Public Health Service booklet X-Ray Examinations . . . A Guide to Good Practice, ". . . there is an element of risk in human exposure to ionizing radiation. This has led to the widely accepted axiom that exposure should be given only when the potential benefit clearly outweighs the potential hazard, and that all unnecessary exposure should be avoided."[4] In the 1973 booklet, "We Want You to Know About Diagnostic X-Rays", the U.S. Food and Drug Administration wrote, "With the support of professional radiology and chest disease associations, FDA is discouraging the use of x-ray screening programs of the general population as

a means of detecting TB and other chest diseases. The primary reason is that these programs are not as effective as other detection techniques, and therefore result in unnecessary radiation exposure of a large segment of the population. When screening is called for, for example in a high tuberculosis incidence area, public health officials recommend the tuberculin skin test. If there is a positive reaction from the test, then it may be necessary to follow up with a chest x ray. Don't decide on your own to have a chest x ray as a precautionary measure. Have an x ray only when recommended by your physician."[5]

During the years of high tuberculosis incidence the use of x-ray examination for screening purposes was found to be justified by the discovery of many new cases each year. However, since that time the practice of exposing individuals to radiation for the purpose of detecting tuberculosis or other health conditions has come under serious question unless these tests are specifically and individually ordered by a licensed practitioner authorized to order such tests. In 1971 the National Tuberculosis and Respiratory Disease Association stated as part of its guideline that ". . . Community x-ray surveys using mobile or portable x-ray units among general population groups are not productive as a screening procedure for pulmonary disease and should be eliminated. In very special circumstances, such as in an apparent outbreak of tuberculosis or in a high incidence area which has no accessible walk-in facility, it may be appropriate to screen a selected population group with chest x-rays (along with tuberculin tests)."[6] In 1972 The Bureau of Radiological Health of the Food and Drug Administration stated, ". . . In regard to chest diseases other than tuberculosis, a Report of the Intersociety Commission for Heart Disease Resources published in January 1971 stated that mass chest x-ray screening for the detection of heart disease had not proven sufficiently rewarding to be recommended. Further, the yield is low when compared to the cost in radiation exposure, money, and time of trained medical personnel. Relatively few patients with previously unknown heart disease amenable to treatment are discovered in this way. The report added that radiologic screening may have a place in special circumstances where the incidence of curable or salvageable congenital or acquired heart disease is thought to be unusually high."[7] Also in 1972, the Assistant Secretary for Health and Scientific Affairs of the Department of Health, Education and Welfare wrote, "Community chest x-ray surveys among the general population for detection of other pulmonary disease or heart disease have not proven sufficiently rewarding and should not be done."[8]

Currently in some areas multiphasic x-ray screening is being performed on the public without individual physician prescriptions. For selected groups certain examinations may be warranted for screening. In these instances there must be a clear medical benefit for each individual being exposed to x rays. One of the types of screening that is being performed with increasing frequency is mammographic screening. The American College of Radiology and the Bureau of Radiological Health - FDA recommended in April, 1975 against x-ray examination of the breast for asymptomatic women under 35 years of age. Continued research is being conducted to determine whether the 35-50 age group can benefit by x-ray examination of this type.

Another multiphasic x-ray screening being performed is dental screening using a panographic dental x-ray machine. A Guide to Screening published by the U.S. Department of Health, Education, and Welfare in cooperation with the American

Academy of Pediatrics states that the purpose of screening for dental disease is to assure that persons requiring dental care are receiving it. To further explain dental screening A Guide to Screening concluded that the purpose of dental screening is not to identify dental disease, but rather to determine whether or not the individual is receiving regular dental care.[9] To avoid unnecessary irradiation dental x-ray screening should be performed only if the information of whether or not the individual is receiving regular dental care cannot be obtained by other means.

The most common and frequent type of x-ray exposure for screening is the chest x-ray. In accord with its efforts to eliminate unnecessary radiation exposure the Minnesota Department of Health set a maximum exposure limit for chest x-ray exposure. This maximum value was obtained after current studies were reviewed. One of the studies was performed by the X-Ray Science and Engineering Laboratory of Oregon State University under contract with the Bureau of Radiological Health (D.H.E.W.)[10]. This study shows that using normally accepted techniques and conventional equipment in good repair, a large patient (28 cm in thickness) would receive a skin entrance exposure of 28 mR for a posterior-anterior (PA) view. The National Evaluation of X-Ray Trends data based on measurements provided by the States has shown for the year 1974 that the median exposure at skin entrance for a posterior-anterior exposure of a 23 cm thick person is 20 mR.[11] In the 1970 Public Health Service study Population Exposure to X-Rays the mean estimated exposure per film for a radiographic chest examination was 44 mR at skin entrance.[12] Since the value from the 1970 PHS study is a mean estimate rather than a median value such as that in the N.E.X.T. study, a few inordinately large exposure values may have unduly influenced the estimated exposure per film. Nevertheless, the upper limit of 50 mR per exposure at skin entrance for a chest x-ray was set sufficiently high to allow for technique, screen and grid variations which may have caused some of the higher exposure values during the 1970 Public Health Service Study.

Upper limit exposure values for x-ray screening other than chest x-ray have not been specified. Variations of equipment and techniques are significant. It is difficult to specify a precise number as the maximum value. However, experience and actual field data have been utilized in performing nationally recognized studies. The numbers listed as exposure values for each projection or view represent commonly recognized exposures utilizing currently accepted equipment and techniques. At this time there are no widely accepted studies for projections other than the chest on which laboratory studies for optimum procedures and conditions have been performed. Consequently the values from commonly accepted national studies must serve as a guide. The studies selected for purposes of this regulation are the Public Health Service study Population Exposure to X-Rays in U.S. 1970[13] and "Nationwide Evaluation of X-Ray Trends"[14] These two studies were chosen because of the extensive research which was conducted to make these studies accurate and comprehensive.

Besides dealing with upper limit exposure values for x-ray screening, the proposed rule requires the submission of an application containing all the information which the Board will need in order to make a decision as to whether the proposed screening is a justified public health measure and that the benefit derived from the proposed screening will outweigh the detriment of x-ray exposure. In order to make a reasonable and informed decision, it is

important for the Board to know not only why the screening is proposed but what will be done with the information that is obtained from the screening program. Obviously, if the information is not communicated in a meaningful way to the persons being screened or their health professionals so that effective follow-up procedures could be commenced for those for which the screening so indicated, the screening program could not be justified as a beneficial public health measure.

When a serious radiation hazard exists jeopardizing the health of persons in the vicinity of the screening program, the Board inspector will give notice for immediate cessation of the program to the applicant. The hazard may be due to malfunction of the x-ray unit, improper operating techniques, or insufficient shielding around the x-ray room. Immediate cessation of the program when a radiation hazard exists is necessary for the radiation protection of the patient, the operators, and the public who may be in the waiting room or vicinity. As the references on the attahced sheet indicate, serious harm to individuals can result within a short period of time if there is large exposure to x-ray radiation.

In addition, the proposed rule provides for the withdrawal of Board approval upon finding after an inspection that discrepancies exist between the screening program as implemented and as described in the application or for violation of Minnesota Rules MHD 181-185 relating to ionizing radiation. Withdrawal of approval will take effect three days after the applicant receives notice of the withdrawal unless a hearing is requested in that period of time. The hearing can be held three days after the request for it. These relatively short notice periods are necessary since most screening programs are completed within an extremely short period of time.

It has become increasingly clear that in safeguarding the public health in the area of radiation protection, it is not sufficient to provide adequate equipment. Individuals must be protected from unnecessary irradiation resulting from nonbenficial x-ray examination. The amendment to MHD 181 accomplishes this by reserving x-ray screening to those population groups where the benefit clearly outweighs the risk. This in no way restricts an individual licensed practitioner from prescribing those x-ray examinations for his patient that he deems necessary.

References

1. International Commission on Radiological Protection (ICRP), "Recommendations of the International Commission of Radiological Protection (Adopted September 17, 1965)", p. 6, (29).

2. National Council on Radiation Protection and Measurements (NCRP), "Basic Radiation Protection Criteria", p. 72 (191).

3. National Academy of Sciences, "The Effects on Populations of Exposure to Low Levels of Ionizing Radiation", pp. 85-87, 136-138, 145-148, November 1972.

4. U. S. Department of Health, Education and Welfare, "X-Ray Examinations . . . A Guide to Good Practice", Forward, 1971.

5. U. S. Department of Health, Education and Welfare, "We Want You To Know About Diagnostic X-Rays", 1973.

6. National Tuberculosis and Respiratory Disease Association Bulletin, "Chest X-Ray Screening Recommendations for TB - RD Associations".

7. U. S. Department of Health, Education and Welfare policy statements, "The Chest X-Ray as a Screening Procedure for Cardiopulmonary Disease" and Documentation Report in Support of the Policy Statement.

8. U. S. Department of Health, Education and Welfare, "The Chest X-Ray as a Screenining Procedure for Cardiopulmonary Disease", p. 2, 1972.

9. U. S. Department of Health, Education and Welfare, A Guide To Screening, "Screening for Dental Disease and Care", pp. 105-109, 1974.

10. X-Ray Science and Engineering Laboratory, Oregon State University, "PA Chest Radiography, Typical 'In Air' Patient Exposures", 1974.

11. Nationwide Evaluation of X-Ray Trends: Tabulation of Data for 'All States' for Period 01/01/74 to 12/31/74.

12. U. S. Department of Health, Education and Welfare, Population Exposure to X-Rays U.S. 1970, pp. 39, 40, 65, 66, 86, 90-95, November 1973.

13. Ibid.

14. Nationwide Evaluation of X-Ray Trends: Tabulation of Data for 'All States' for Period 01/01/74 to 12/31/74.

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA

COMMISSIONER OF HEALTH

In the Matter of the Proposed Amendments to MHD 181 Relating to the Limitation of the Use of X-Ray Machines in Screening for the Detection and Evaluation of Health Conditions

ORDER ADOPTING RULES

The above-entitled matter came on for hearing before the Minnesota Commissioner of Health (hereinafter "Commissioner") on the 24th day of October, 1975, at 9:00 a.m. in the Board Room, Minnesota Department of Health Building, 717 Delaware Street S.E., Minneapolis, Minnesota 55440, after proper notice required by Minn. Stat. § 15.0412 (Supp. 1975) was served upon all persons, associations and other interested groups registered with the Secretary of State for that purpose.

After affording interested persons an opportunity to present written and oral data, statements and arguments, and having heard and considered all of the testimony and evidence adduced and upon the records, files and proceedings herein, and applicable statutory standards or criteria, and having confirmed the need for the above-captioned rules.

NOW, THEREFORE, IT IS ORDERED that these amendments to MHD 181(b) and (h) relating to the limitation of the use of x-ray machines in screening for the detection and evaluation of health conditions are adopted this 19th day of September, 1977, pursuant to authority vested in me by Minn. Stat. § 144.12 subd. 1 (1976).

STATE OF MINNESOTA

DEPARTMENT OF HEALTH

WARREN R. LAWSON, M.D.
Commissioner of Health

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA

COMMISSIONER OF HEALTH

In the Matter of the Proposed Amendments to MHD 181 Relating to the Limitation of the Use of X-Ray Machines in Screening for the Detection and Evaluation of Health Conditions

FINDINGS OF FACT

The above-entitled matter came on for hearing before the Minnesota Commissioner of Health (hereinafter the "Commissioner") */ on the 24th day of October, 1975, at approximately 9:00 a.m., in the Board Room, Minnesota Department of Health Building, 717 Delaware Street Southeast, Minneapolis, Minnesota 55440, after proper notice required by Minn. Stat. § 15.0412 (1976) was served upon all persons, associations and other interested groups registered with the Secretary of State for that purpose and also upon other persons, associations and groups of which the Commissioner was aware of as possibly having an interest in the above-captioned rules.

After affording interested persons an opportunity to present written and oral data, statements and arguments, and having heard and considered all of the testimony and evidence adduced and upon the records, files and proceedings herein, the Commissioner makes and enters the following findings:

1. The basic intent of the amendment to MHD 181 is to prohibit the use of x-ray machines for the purpose of screening, as defined in the rule, unless the person or group desiring to use an x-ray machine receives prior written approval from the Commissioner. Approval will be granted if it is determined that the proposed screening is a justified public health measure, the benefit derived from the proposed screening will outweigh the detriment of exposure to x rays, and the proposed screening meets all other applicable laws for the use of x-ray machines. Healing arts practitioners when ordering x rays for specified individuals and specified research projects are excluded from the definition of screening.

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*/ These proceedings to consider the amendments to MHD 181 were initiated by the State Board of Health. However, the 1977 Legislature abolished the Board and transferred all of its powers and duties to the Commissioner of Health. Minn. Laws 1977, ch. 305 §§ 39, 44, 45, 47. Consequently, these Findings are the Commissioner's and not the Board's.

2. The specific statutory authority which entitles the Commissioner to adopt these rules is contained in Minn. Stat. § 144.12 subd. 1(15) (1976) which authorizes the Commissioner to adopt reasonable rules " . . . for the preservation of the public health," which may include the control, " . . . by taking out of licenses or permits, or by other appropriate means, . . . (15) Sources of radiation . . . ."

3. The need to adopt this regulation is based upon primarily two factors. First, there is an increased concern about exposure of the population to ionizing radiation. Radiation exposure at any level is considered to involve some risk. Since there is a certain amount of radiation to which all people are exposed through their environment, in addition to the exposure that is received through diagnostic or treatment x rays ordered by a licensed healing arts practitioner, it is imperative to eliminate all unnecessary exposures insofar as is practically possible. Secondly, improvements in technology have resulted in the development of other diagnostic techniques for detecting adverse health conditions (not just limited to tuberculosis) which do not involve or greatly reduce radiation exposure. (Statement of Need, MHD Exhibit 6.)

4. Based upon the factors listed in paragraph 3 herein, the amendments to MHD 181 are needed to prevent the use of x-ray units from being utilized for screening purposes when other means of testing for health conditions are available which impose less potential risk to the individual and when the potential benefit from screening does not outweigh the detriment of x-ray exposure. On the other hand, when screening is justified, the amendment will assure that the radiation exposure will be the minimum necessary to achieve the screening goal. (MHD Exhibit 6.)

5. The purpose of this rule to restrict the use of x rays for mass screening purposes is in accord with the views expressed by the International Commission of Radiological Protection that there is no wholly safe radiation dose:

> A basis of the Commission's recommendations is the cautious assumption that any exposure to radiation may carry some risk for the development of somatic effects, including leukemia and other malignancies and of hereditary effects. The assumption is made that down to the lowest levels of dose, the risk of inducing disease or disability increases with the dose accumulated by the individual. This assumption implies that there is no wholly "safe" dose of radiation . . . . [t] he Commission believes that the policy of assuming a risk of injury at low doses is the most reasonable basis for radiation protection.

"Recommendations of the International Commission of Radiological Protection (Adopted September 17, 1965)," p. 6, (29). (MHD Exhibit 10, reference 1.)

6. During the years of high tuberculosis incidence, the use of x-ray examinations for screening purposes was found to be justified by the discovery of many new cases each year. However, since that time numerous medical authorities and federal health-related governmental agencies have concluded that community chest x rays as a screening procedure among the general population for detection of tuberculosis, heart disease, and other pulmonary disease have not proven sufficiently rewarding and should not be done unless these tests are specifically and individually ordered by a licensed practitioner authorized to order such tests. In light of the recent research which has revealed the possible risk involved in any exposure to radiation and in light of the fact that x rays are no longer productive as a screening technique for tuberculosis and other diseases, exposure should be given only when the potential benefit clearly outweighs the potential hazard. All unnecessary exposure should be avoided. (T. at 44, l. 13 to T. at 47, l. 13; Exhibits 10, 14 and 19.)

7. The public can best be protected from radiation exposure by reducing x-ray exposure. Considering only genetic doses and looking at the total contribution from all radiation sources, half the genetic dose to the population is contributed by natural background radiation, 30-40 percent is contributed by medical and dental x rays and only ten percent is from nuclear reactors, fall-out and other man-made sources. The most significant reduction in exposure to the population therefore can be accomplished by the elimination of x-ray examinations which are not medically indicated. (MHD Exhibit 21.)

8. The definition of screening as originally proposed has been modified slightly to clarify that it does not include research projects conducted under specified conditions. See Exhibit 13. The main thrust of this rule was aimed at controlling screening of the general public or special groups of people in a non-medical setting. Research projects carried out in a medical or medical training environment and/or under appropriate medical authorization, control and protocols was not within the original intent and scope of the rule thus justifying the clarifying modification made to the definition of screening.

9. Approval to conduct a screening program is obtained from the Commissioner by submitting an application which demonstrates that the criteria for approval as specified in MHD 181(h)(2) will be met. The criteria for approval contained in MHD 181(h)(2)(aa) and (bb) express the very reasons why this rule has been adopted. See paragraphs 3 through 7 herein. The basic premise is that any x-ray exposure is potentially hazardous. However, there are certain circumstances in

which the use of x ray is justified since the medical benefit to each person will outweigh the detriment of exposure. But demonstrating that the benefits of x ray outweigh the detriments is insufficient alone to justify approval of a screening proposal. The screening must also be a justified public health measure. These are basic nationally recognized standards for conducting screening programs. (MHD Exhibit 10.)

10. A third criteria for approval was added (MHD 181(h)(2)(cc)) as a result of letters received both before and after the hearing and as a result of testimony given at the hearing. (Exhibit 12; Letter of November 10, 1975, from Arthur Gillen to Hearing Officer David Giese; T. at 14, l. 25 to T. at 18, l. 6.) Other laws relate to the operation and maintenance of x-ray machines such as MHD 181-185. In addition, under Minnesota licensing statutes, only Minnesota licensed practitioners of the healing arts or certain specified individuals under their supervision may operate the machines and take x rays. The provision of MHD 181(h)(2)(cc) assures that all Minnesota laws relating to the taking of x rays and the operation of the x-ray machines will be complied with as part of the screening program. The rule also assures that those personnel operating the x-ray machines who are not required by Minnesota law to be licensed or otherwise credentialed are pursuant to MHD 181(h)(1)(cc) properly trained and qualified to take x rays safely and properly which are basic factors in protecting those who are the subject of x-ray examination.

11. The rule requires the submission of an application. The information which the rule requires to be included in the application is all geared to enable the Commissioner to determine whether the applicant will meet the approval criteria of MHD 181(h)(2)(aa) through (cc). The application directs the applicant to address not only why the screening is proposed but also what will be done with the information obtained about each person as a result of the screening. The latter aspect is just as significant as the former factor in determining whether the proposed program is justified as a beneficial public health measure since if the information obtained by screening is not meaningfully communicated to the persons being screened or their designated health professionals, no effective follow-up or treatment procedures could be commenced rendering the screening worthless. (MHD Exhibit 10.) MHD 181(h)(3)(ll), (mm) and (nn) were added as a result of and are a natural consequence of the addition of MHD 181(h)(2)(cc).

12. Applicants must demonstrate for chest x-ray screening that incident (skin entrance) x-ray exposure will not exceed 50 milliroentgens (mR) per radiograph for the posterior-anterior (PA) view. The method specified for determining the incident exposure is a commonly used method although the rule does permit use of equivalent methods as long as the applicant can demonstrate that the method is as accurate as the one specified in the rule. The 50 mR limit is based upon several studies which demonstrate that if normally accepted x-ray techniques and conventional equipment in good repair are used, there would not be any difficulty in meeting the 50 mR limit. (MHD Exhibit 10 at 3, references 10, 11, and 12.)

13. No maximum limit has been specified in the rule for non-chest x-ray screening because of the significant differences in equipment and techniques used for non-chest x-rays. Additionally, no nationally accepted studies have been performed for non-chest x-rays which suggest upper exposure limits with optimum procedures and conditions. However, nationally recognized surveys have been performed which list the x-ray exposure commonly accepted within x-ray practice using currently accepted equipment and techniques. These surveys have been adopted by reference. The exposure levels specified therein constitute the limits which must be met by a non-chest screening program applicant. This is reasonable since the limits are no more stringent than what occurs in actual practice. (MHD Exhibit 10.)

14. The rule provides for withdrawal of Commissioner approval resulting in cessation of the operation of the screening program. Such withdrawal can occur under two circumstances.

a. First, approval may be withdrawn immediately if the Commissioner determines upon inspection that a serious radiation hazard exists jeopardizing the health of persons in the vicinity of the screening. Immediate cessation of the program is necessary if conditions warrant since serious harm to individuals can result within a short period of exposure to a large amount of x-ray radiation. Appropriate safeguards are built in by authorizing a contested case hearing, if requested by the screening program sponsor, within 10 days of receipt of the request therefor. (MHD Exhibit 10 at 4.)

b. Second, approval can be withdrawn after a hearing for failure to implement the program as described in the application and for violation of MHD 181-185 relating to ionizing radiation. The withdrawal will take effect three days after the screening program sponsor receives notices to that effect unless the sponsor requests a hearing within that period of time. The hearing may be held upon three days notice to the sponsor. These short time periods are justified since most screening programs are completed within an extremely short period of time. An attempt to withdraw approval if longer time periods were specified would be meaningless as most screening programs would be completed before the hearing could be held. (MHD Exhibit 10 at 4.)

15. Other provisions of the regulations not specifically referred to herein are found to be supported by the evidence, are justified and reasonable and relate logically to the purpose and intent of the rule.

16. Many comments and suggested amendments were made at the hearing or submitted in written form. Based thereon, the Commissioner made some modifications, many of which are specifically addressed above. In addition, some other changes were made to the proposed rules which were strictly minor in nature and designed solely to clarify the meaning of the rule as proposed. None of the changes are of a significant nature and do not amend the rules in any substantive manner. Any suggested changes not implemented in the rules as adopted were rejected on the basis that they either were contrary to the rule's purpose and intent or did not materially improve or clarify the rule.

17. All procedural and substantive requirements have been met.

18. The final proposed amendment as adopted will assure that the policies of Minn. Stat. § 144.12 (1976) will be fulfilled. The protection of the public health and welfare requires that exposure to radiation be restricted to those situations where the benefits of the x rays clearly outweigh the risk of exposure. The amendment to MHD 181 will accomplish this purpose in an orderly and reasonable manner.

Dated: September 19, 1977.

STATE OF MINNESOTA

DEPARTMENT OF HEALTH

WARREN R. LAWSON, M.D.
Commissioner of Health

STATEMENT OF COMPLIANCE WITH

MANUAL OF RULE MAKING PROCEDURES

I, Assistant Attorney General Richard A. Wexler, do hereby declare that I have examined the proposed amendments to MHD 181(b) and (h) relating to the limitation of the use of x-ray machines in screening for the detection and evaluation of health conditions and all related documents and that, based on them and my personal familiarity with the applicable procedures, the Manual of Rule Making Procedures has been followed.

Dated: September 21, 1977.

RICHARD A. WEXLER
Assistant Attorney General