

Minnesota Attorney General: Administrative Rules Proceedings

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Version 3
August 20, 2018

ATTORNEY GENERAL

Office of the Secretary of State March 8, 1979

Lee E. Sheehy 296-1288
Special Assistant
Attorney General

In the Matter of the Department of Safety's Rules Governing Safe Operating Conditions of Passage Automobile Tires

As explained on the attached memorandum from the agency, certain rules were approved by this office and filed with your office which inadvertently contained a typographical omission. The attached text of the rule remedies that error and is consistent with the Order Adopting first filed in the matter on or about January 29, 1979.

LES:mb

Attachment

ADMIN 1000

STATE OF MINNESOTA

DEPARTMENT Public Safety

Office Memorandum

TO : Lee Sheehy
Attorney General's Office

DATE: March 1, 1979

FROM : Diane Hamilton
Management Analyst

PHONE: 6-7096

SUBJECT: Adopted Safe Tire Rules

On January 29, 1979 you approved and filed with the Secretary of State adopted rules of the Department of Public Safety titled Standards for Safe Operating Condition of Passenger Automobile Tires, 11 MCAR 1.0166-1.0168. The copy you filed contained a typographical omission of an entire subsection.

The attached adopted rules contain the omitted subsection. These rules are consistent with the hearing examiners report, the commissioner's order adopting the rules and the final publication in the state register.

Please refile these rules with the Secretary of State. Thank you and I am sorry for the inconvenience.

DH;bz

Attachment

Tire Safety Rules

RECEIVED
MAR 2 1979
ADMINISTRATIVE AGENCIES

Adopted

MINNESOTA DEPARTMENT OF PUBLIC SAFETY
SAFETY ADMINISTRATION DIVISION

CHAPTER 19: Standards for Safe Operating Condition of Passenger Automobile Tires

11 MCAR 1.0166: PURPOSE AND AUTHORITY

A. Purpose: The purpose of these rules is to establish minimum standards for the safe operating conditions of tires in use on passenger automobiles, station wagons and other highway-use motor vehicles using passenger automobile-type tires.

B. Authority: These rules are promulgated pursuant to the authority granted by Minn. Stat. 169.722 (1976).

11 MCAR 1.0167: DEFINITIONS

For the purposes of these rules, the following terms shall have the meanings ascribed to them:

A. Bead. The part of the tire which is shaped to fit the wheel rim.

B. Cord. The strands forming the plies in the tires.

C. Groove. The space between two adjacent tread ribs.

D. Ply. A layer of rubber-coated parallel cords.

E. Sidewall. That portion of the tire between tread and bead.

F. Tie bar. A transverse rubber rib manufactured into some tire treads to give lateral stability to tread ribs.

G. Tread. That portion of the outer surface of the tire that is designed to come into contact with the road surface.

H. Tread design depth. The distance, measured near the centerline of the tire, from the base of the tread design to the top of the tread.

I. Tread rib. The tread section running circumferentially around the tire.

J. Tread wear indicator. Material molded during the manufacturing process into the bottom of tread grooves and designed to visibly disrupt the tread pattern when the tread design depth has worn to a depth of 2/32 of an inch.

11 MCAR §1.0168: UNSAFE TIRES

A tire is unsafe and unlawful if one or more of the following conditions exist:

A. There is any part of the ply or cord exposed.

B. There is ~~any bump, bulge or~~ a separation which may be indicated by a bump or bulge of the sidewall, tread or ply.

C. There is a tread design depth of less than 2/32 of an inch measured in the tread groove nearest the center of the tread at three (3) locations spaced approximately equally around the circumference of the tire, exclusive of tie bars or for those tires with tread wear indicators.

D. It is worn to the level of the tread wear indicators in any two tread grooves at three locations.

E. It is marked "not for highway use", or "for racing purposes only", or "unsafe for highway use"; or any similar marking indicating the tire is not designed for highway use.

F. The tread or sidewall has cracks, cuts, or snags deep enough to expose the body cords.

G. It has been regrooved or recut below the original tread design depth, except certain taxi cab tires which have additional under-tread rubber and are specifically identified as such by use of the word "Regroovable" molded on or into each sidewall of the tire.

APPROVED AS TO FORM AND LEGALITY
MAR. 8 1979 19
WARREN SPANNAUS, ATTORNEY GENERAL
BY
SPECIAL ASSISTANT ATTORNEY GENERAL

STATE OF MINNESOTA
DEPARTMENT OF STATE
FILED
MAR - 9 1979
Joan Anderson Growe
Secretary of State
10:10 AM

#499 Public Safety

RULES REVIEW CHECKLIST

DATE RULES RECEIVED 1/10 Temporary Rule _____

Resubmitted and Received 1-2

DUE DATE 1-30/1-12

a. Returned to Agency w/o filing w/Secy of State _____
b. Approved 1-29 Date Sent Back to Agency _____

Typo error ~~to resubmitted for~~ as corrected for approval
Approved 3/8/79

1. Rules as Adopted ✓
2. Rules as Proposed ✓
3. Certificate of Board's Authorizing Resolution, where applicable N.A.
4. Order for Hearing ✓
5. Notice of Hearing ✓
   (i) Sufficiency ✓
6. Secretary of State's List ✓
7. Certificate of Acquisition of Secretary of State's List ✓
8. Affidavit of Mailing ✓
   (i) At least 30 days prior to hearing ✓
9. Statement of Need and Evidence ✓
10. Hearing Examiner's Report ✓
11. Agency's Findings of Fact ✓
12. Certificate of Board's Resolution Adopting Rules, where applicable N.A.
13. Order Adopting ✓
14. Report of Chief Hearing Examiner ✓
    (i) Finding of No Substantial Change ✓
    (ii) Permission to Incorporate by Reference, where applicable N.A.
15. Certificate of Compliance with Rulemaking Procedures ✓
16. Copy of Notice of Intent to Solicit Outside Opinion, where applicable N.A.
17. Petition by Public, where applicable N.A.

Our File #499

ADMIN 1000 (Rev. 1/78)

STATE OF MINNESOTA

DEPARTMENT ATTORNEY GENERAL

Office Memorandum

TO : Diane Hamilton
Management Analyst
Department of Public Safety

DATE: March 9, 1979

FROM : Lee E. Sheehy
Special Assistant
Attorney General

PHONE: 296-1288

SUBJECT: In the Matter of the Department of Public Safety's Rules Governing Safe Operating Conditions of Passenger Automobile Tire

I have approved and filed with the Secretary of State the amended text of the above-captioned rules correcting the typographical omission, along with a copy of your memorandum. Attached hereto are copies of the approved rules for the agency and, if appropriate, counsel's files.

If you have any questions, do not hesitate to call me.

LES:mb

Enclosure

ADOPTED RULES

MINNESOTA DEPARTMENT OF PUBLIC SAFETY
SAFETY ADMINISTRATION DIVISION

CHAPTER 19: Standards for Safe Operating Condition of Passenger Automobile Tires

11 MCAR 1.0166: PURPOSE AND AUTHORITY

A. Purpose: The purpose of these rules is to establish minimum standards for the safe operating conditions of tires in use on passenger automobiles, station wagons and other highway-use motor vehicles using passenger automobile-type tires.

B. Authority: These rules are promulgated pursuant to the authority granted by Minn. Stat. 169.722 (1976).

11 MCAR 1.0167: DEFINITIONS

For the purposes of these rules, the following terms shall have the meanings ascribed to them:

A. Bead. The part of the tire which is shaped to fit the wheel rim.

B. Cord. The strands forming the plies in the tires.

C. Groove. The space between two adjacent tread ribs.

D. Ply. A layer of rubber-coated parallel cords.

E. Sidewall. That portion of the tire between tread and bead.

F. Tie bar. A transverse rubber rib manufactured into some tire treads to give lateral stability to tread ribs.

G. Tread. That portion of the outer surface of the tire that is designed to come into contact with the road surface.

H. Tread design depth. The distance, measured near the centerline of the tire, from the base of the tread design to the top of the tread.

I. Tread rib. The tread section running circumferentially around the tire.

J. Tread wear indicator. Material molded during the manufacturing process into the bottom of tread grooves and designed to visibly disrupt the tread pattern when the tread design depth has worn to a depth of 2/32 of an inch.

11 MCAR §1.0168: UNSAFE TIRES

A tire is unsafe and unlawful if one or more of the following conditions exist:

A. There is any part of the ply or cord exposed.

B. There is ~~any bump, bulge or~~ a separation which may be indicated by a bump or bulge of the sidewall, tread or ply.

C. There is a tread design depth of less than 2/32 of an inch measured in the tread groove nearest the center of the tread at three (3) locations spaced approximately equally around the circumference of the tire, exclusive of tie bars or for those tires with tread wear indicators.

D. It is marked "not for highway use", or "for racing purposes only", or "unsafe for highway use"; or any similar marking indicating the tire is not designed for highway use.

F. The tread or sidewall has cracks, cuts, or snags deep enough to expose the body cords.

G. It has been regrooved or recut below the original tread design depth, except certain taxi cab tires which have additional under-tread rubber and are specifically identified as such by use of the word "regroovable" molded on or into each sidewall of the tire.

STATEMENT OF COMPLIANCE WITH

MANUAL OF RULE MAKING PROCEDURES

I, Special Assistant Attorney General Frederick Suhler,
do hereby declare that I have examined the proposed rules 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.



Special Assistant Attorney General

Dated: 1/9/78

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS

FOR THE DEPARTMENT OF PUBLIC SAFETY

In the Matter of the Proposed Adoption of Rules of the State Department of Public Safety Governing Safe Operating Condition of Passenger Automobile Tires.

REPORT OF HEARING EXAMINER

The above-entitled matter came on for hearing before State Hearing Examiner George A. Beck at 9:00 a.m. on Thursday, November 30, 1978, in Room 14 of the State Office Building, Wabasha Street between Aurora and Fuller in the City of Saint Paul, County of Ramsey, State of Minnesota.

This Report is part of a rule hearing procedure pursuant to Minn. Stat. Sec. 15.0411 to Sec. 15.047 and Sec. 15.052 to determine whether the proposed rule should be adopted and given the force of law. Copies of this Report may be obtained from the Office of Hearing Examiners for the cost of reproduction.

Members of the agency panel appearing at the hearing included: Major Dick Lueck, Minnesota State Patrol; Diane Hamilton, Department of Public Safety; and Frederick S. Suhler, Special Assistant Attorney General.

Two public witnesses appeared and spoke at the hearing. The Department of Public Safety submitted ten written exhibits. Five written exhibits were received from the public subsequent to the publication of the Notice of Hearing through the end of the five working day period for written comments following the hearing.

Based upon all the testimony, exhibits and written comments, the Hearing Examiner makes the following:

FINDINGS OF FACT

1. On October 6, 1978, the Department of Public Safety filed the following documents with the Chief Hearing Examiner:

(a) A copy of the proposed rules;
(b) A proposed Order for Hearing;
(c) A proposed Notice of Hearing; and
(d) A Statement of the number of persons expected to attend and the length of the agency presentation.

2. On October 30, 1978, a Notice of Hearing and a copy of the proposed rule were published at 3 State Register 889.

3. On October 27, 1978, the Department mailed the Notice of Hearing to all persons and associations who had registered their names with the Secretary of State to receive such notice.

4. On November 3, 1978, the Department filed the following documents with the Hearing Examiner:

(a) Order for Hearing;
(b) Notice of Hearing as mailed;
(c) A copy of the proposed rules;
(d) Affidavit of Mailing;
(e) Affidavit of Receipt of Secretary of State's list; and
(f) Statement of Need and Reasonableness.

The documents were available for inspection at the Office of Hearing Examiners from the date of filing to the date of hearing.

5. The record remained open through December 7, 1978, for the receipt of written comments and statements.

6. The Department cites Minn. Stat. Sec. 169.722 as its authority for promulgation of the proposed rules. That statute reads as follows:

> The commissioner shall promulgate rules pursuant to chapter 15 providing for the safe operating conditions of tires for use on passenger automobiles. The rules shall be so promulgated that a law enforcement officer may determine whether or not a tire is in compliance by visual inspection or by the use of simple measuring gauges. The rules shall be based on and include effects of tread wear and depth of tread, and shall incorporate all of the provisions of section 169.723.

7. Minn. Stat. Sec. 169.723 reads as follows:

A tire shall be considered unsafe if it has:

> (1) Any part of the ply or cord exposed; or
>
> (2) Any bump, bulge or separation; or
>
> (3) A tread design depth of less than 2/32 (1/16) of an inch measured in the tread groove nearest the center of the tire at three locations equally spaced around the circumference of the tire, exclusive of tie bars or for those tires with tread wear indicators; or
>
> (4) Been worn to the level of the tread wear indicators in any two tread grooves at three locations; or
>
> (5) A marking "not for highway use", or "for racing purposes only", or "unsafe for highway use"; or
>
> (6) Tread or sidewall cracks, cuts or snags deep enough to expose the body cords; or
>
> (7) Been regrooved or recut below the original tread design depth, except special taxi cab tires which have extra undertread rubber and are identified as such.

7. The proposed rules, including 11 MCAR Sec. 1.0166 - Purpose and Authority, 11 MCAR Sec. 1.0167 - Definitions and 11 MCAR Sec. 1.0168 - Unsafe Tires are adopted pursuant to the statutory mandate above and will permit enforceable standards for police and the courts to use in the enforcement of Minn. Stat. Sec. 169.724, which makes it unlawful to operate an automobile unless it is equipped with tires in safe operating condition. The Department's Statement of Need and Reasonableness (Ex. 4) together with the oral testimony at the hearing adequately demonstrate the need and reasonableness of the proposed rules. It should be noted that Sec. 1.0168 is essentially a restatement of the statute, Minn. Stat. Sec. 169.723. Minn. Stat. Sec. 169.722 specifically requires the Department to incorporate all of the provisions of Section 169.723. Accordingly, no finding under Minn. Stat. Sec. 15.0412, subd. 1 in regard to duplicating statutory language, is necessary.

8. The only public comments were those of the Rubber Manufacturers Association (RMA) which supported the proposed rules except for one subsection. RMA suggested that 11 MCAR Sec. 1.0168 B. be amended to read as follows:

> There is a separation which may be indicated by a bump or bulge of the sidewall tread or ply.

The RMA testified that minor bumps, bulges, or knots on a tire are not uncommon, but are often cosmetic in nature and neither affect the structural integrity of nor the safe operational expectations from the tire. The RMA was concerned that the proposed wording might be interpreted to prematurely retire safe tires from service. Accordingly, RMA's suggested language would make unlawful any tire with a bump or bulge due to ply separation. It was stated that a bump or bulge caused by a ply separation is relatively larger and more bulbous than a cosmetic flaw and therefore, can be readily distinguished by law enforcement personnel. (Ex. B)

9. The Department had no objection to the amendment offered by the RMA. (Ex. 10) So amended, 11 MCAR Sec. 1.0168 B. is needed and reasonable.

Based upon the foregoing Findings of Fact, the Hearing Examiner makes the following:

CONCLUSIONS

1. That the Department of Public Safety gave proper notice of the promulgation of the proposed rules.

2. That the Department of Public Safety has statutory authority to promulgate the proposed rules.

3. That the Department of Public Safety has fulfilled all relevant substantive and procedural requirements of law or rule.

4. That the Department of Public Safety has demonstrated the need for and reasonableness of the proposed rules by an affirmative presentation of facts in the record.

Based upon the foregoing Conclusions, the Hearing Examiner makes the following:

RECOMMENDATION

It is recommended that the proposed rules be adopted by the Department of Public Safety as amended.

Dated: December 12, 1978.

GEORGE A. BECK
Hearing Examiner

N O T I C E

Pursuant to Minn. Stat. Sec. 15.0412, subd. 4, this Report shall be available for review to all affected individuals upon request for at least five days.

The Department of Public Safety shall, if it proposes to adopt the rules as originally proposed or amended, submit the complete hearing record, including its Findings and Order, to the Chief Hearing Examiner no earlier than five days subsequent to the receipt of this Report. This submission shall clearly indicate any changes made to the rules as originally proposed, preferably in the format that will be submitted to the State Register for publication. The Chief Hearing Examiner shall complete his review and submit his report to the Department on the issues of substantial changes in the

rule and compliance with Minn. Stat. Sec. 15.0412 within ten calendar days. Thereafter, the Department shall be responsible for filing the rules with the Attorney General and for notifying persons who have indicated that they wish to be notified of such filing.

DPS-79-001-GB

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS

FOR THE DEPARTMENT OF PUBLIC SAFETY

IN THE MATTER OF THE PROPOSED ADOPTION OF RULES OF THE STATE DEPARTMENT OF PUBLIC SAFETY GOVERNING SAFE OPERATING CONDITION OF PASSENGER AUTOMOBILE TIRES.	REPORT OF THE CHIEF HEARING EXAMINER

WHEREAS, a hearing was held on November 30, 1978, before George A. Beck, a Hearing Examiner of the State Office of Hearing Examiners, on the above-entitled matter in compliance with Minn. Stat. § 15.0412, Subd. 4; and

WHEREAS, the Report of Hearing Examiner made pursuant to Minn. Stat. § 15.052, Subd. 3, was issued to the Department of Public Safety on December 12, 1978; and

WHEREAS, the Department of Public Safety has now determined to adopt rules pursuant to Minn. Stat. § 15.0412, Subd. 4; and

WHEREAS, the Department of Public Safety has submitted said rules to the Chief Hearing Examiner for review pursuant to Minn. Stat. § 15.052, Subd. 4, and Rule HE 110; and

WHEREAS, the Chief Hearing Examiner finds that the final proposed rules are not substantially different from those proposed at the public hearing and that the Department of Public Safety has met all requirements of Minn. Stat. § 15.0412, Subd. 4.

NOW, THEREFORE, upon receipt of this Report, the Department of Public Safety has the responsibility of submitting the complete hearing record and the rules as adopted by the Department to the Attorney General, notifying all persons who requested to be informed that the hearing record has been submitted to the Attorney General, and publishing in the State Register, all pursuant to Minn. Stat. § 15.0412, Subd. 4.

Dated this 8th day
of January, 1979.

DUANE R. HARVES
Chief Hearing Examiner

A. There is any part of the ply or cord exposed.

B. There is any bump, bulge or separation of the sidewall, tread or ply.

C. There is a tread design depth of less than 2/32 of an inch measured in the tread groove nearest the center of the tread at three (3) locations spaced approximately equally around the circumference of the tire, exclusive of tie bars or for those tires with tread wear indicators.

D. It is worn to the level of the tread wear indicators in any two tread grooves at three locations.

E. It is marked "not for highway use", or "for racing purposes only", or "unsafe for highway use"; or any similar marking indicating the tire is not designed for highway use.

F. The tread or sidewall has cracks, cuts, or snags deep enough to expose the body cords.

G. It has been regrooved or recut below the original tread design depth, except certain taxi cab tires which have additional under-tread rubber and are specifically identified as such by use of the word "Regroovable" molded on or into each sidewall of the tire.

PROPOSED RULES

MINNESOTA DEPARTMENT OF PUBLIC SAFETY
SAFETY ADMINISTRATION DIVISION

CHAPTER 19: Standards for Safe Operating Condition of Passenger Automobile Tires

11 MCAR 1.0166: PURPOSE AND AUTHORITY

A. Purpose: The purpose of these rules is to establish minimum standards for the safe operating conditions of tires in use on passenger automobiles, station wagons and other highway-use motor vehicles using passenger automobile-type tires.

B. Authority: These rules are promulgated pursuant to the authority granted by Minn. Stat. 169.722 (1976).

11 MCAR 1.0167: DEFINITIONS

For the purposes of these rules, the following terms shall have the meanings ascribed to them:

A. Bead. The part of the tire which is shaped to fit the wheel rim.

B. Cord. The strands forming the plies in the tires.

C. Groove. The space between two adjacent tread ribs.

D. Ply. A layer of rubber-coated parallel cords.

E. Sidewall. That portion of the tire between tread and bead.

F. Tie bar. A transverse rubber rib manufactured into some tire treads to give lateral stability to tread ribs.

G. Tread. That portion of the outer surface of the tire that is designed to come into contact with the road surface.

H. Tread design depth. The distance, measured near the centerline of the tire, from the base of the tread design to the top of the tread.

I. Tread rib. The tread section running circumferentially around the tire.

J. Tread wear indicator. Material molded during the manufacturing process into the bottom of tread grooves and designed to visibly disrupt the tread pattern when the tread design depth has worn to a depth of 2/32 of an inch.

11 MCAR §1.0168: UNSAFE TIRES

A tire is unsafe and unlawful if one or more of the following conditions exist:

STATE OF MINNESOTA

BEFORE EDWARD G. NOVAK

COUNTY OF RAMSEY

COMMISSIONER OF PUBLIC SAFETY

In the matter of the Proposed Adoption of Rules of the State Department of Public Safety Governing Safe Operating Condition of Passenger Automobile Tires.

ORDER ADOPTING RULES

The above-entitled matter came on for hearing before the Commissioner of Public Safety of the State of Minnesota on the 30th day of November, 1978, at 9 a.m. in Room 14 of the State Office Building, St. Paul, Minnesota, 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.

After affording interested persons an opportunity to present written and oral data, statements and arguments, having considered all of the 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 and the reasonableness thereof.

NOW, THEREFORE, IT IS ORDERED that these rules identified as 11 MCAR 1.0166 through 1.0168 are adopted this 28th day of December, 1978, pursuant to authority vested in me by Minn. Stat. 299A.01, subd. 6 (1976).

STATE OF MINNESOTA
DEPARTMENT OF PUBLIC SAFETY

Edw G Novak

COMMISSIONER OF PUBLIC SAFETY

STATE OF MINNESOTA

BEFORE EDWARD G. NOVAK

COUNTY OF RAMSEY

COMMISSIONER OF PUBLIC SAFETY

In the matter of the Proposed adoption of Rules of the State Department of Public Safety Governing Safe Operating Condition of Passenger Automobile Tires.

FINDINGS OF FACT

The above-entitled matter came on for hearing before George A. Beck, Office of Hearing Examiners of the State of Minnesota on the 30th day of November, 1978, at 9 a.m. in Room 14 of the State Office Building, St. Paul, Minnesota, 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.

After affording interested persons an opportunity to present written and oral data, statements and arguments, having heard all of the testimony, having considered all of the evidence adduced and upon the records, files and proceedings herein, the Hearing Examiners has made his findings, attached. Upon review of the Hearing Examiner's findings and the evidence and statements submitted by interested parties, I find the following:

The report of the hearing examiner is hereby adopted as the findings of the Commissioner of Public Safety.

STATE OF MINNESOTA
DEPARTMENT OF PUBLIC SAFETY

Edw G Novak

COMMISSIONER OF PUBLIC SAFETY

December 28, 1978

DATE

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE Edward G. Novak

COMMISSIONER OF PUBLIC SAFETY

In the matter of the Proposed Adoption of Rules of the State Department of Public Safety Governing Safe Operating Condition of Passenger Automobile Tires

ORDER FOR HEARING

To effectively implement Minnesota Statute 169.722 (1976), the Minnesota Commissioner of Public Safety deems it necessary to consider adoption of the proposed rules captioned above pursuant to the authority vested in me by Minnesota Statute 299A.01, subd. 6 (1976).

NOW, THEREFORE, IT IS ORDERED this 4th day of October, 1978, that a public hearing on the proposed rules captioned above be held in Room 14, State Office Building, St. Paul, Minnesota November 30, 1978, commencing at 9:00 a.m., and groups or persons have had an opportunity to be heard.

IT IS FURTHER ORDERED, that a Notice of Hearing be mailed to all persons or representatives of associations or other interested groups who have registered their names with the Secretary of State for that purpose.

IT IS FURTHER ORDERED, that the Notice of Hearing be published in the State Register.

STATE OF MINNESOTA
DEPARTMENT OF PUBLIC SAFETY

Edw G Novak
COMMISSIONER OF PUBLIC SAFETY

STATE OF MINNESOTA

BEFORE Edward G. Novak

COMMISSIONER OF PUBLIC SAFETY

In the matter of the Proposed adoption
of Rules of the State Department of
Public Safety Governing Safe Operating
Condition of Passenger Automobile Tires

NOTICE OF HEARING

Notice is hereby given that a public hearing in the above-entitled matter will be held in Room 14, State Office Building, Wabasha Street between Aurora and Fuller, St. Paul, Minnesota on November 30, 1978, commencing at 9:00 a.m., and continuing until all persons have had an opportunity to be heard concerning adoption of the proposed rules captioned above.

All interested or affected persons or representatives of groups or organizations will have an opportunity to participate, by submitting either oral or written data, statements, or arguments. Written materials may be submitted by mail to George Beck, Office of Hearing Examiners, 1745 University Ave., St. Paul Minnesota, either before the hearing or within 5 days after the close of the hearing (or within 20 days if so ordered by the hearing examiner).

The Commissioner proposes to adopt rules relating to physical appearance, tread wear and depth of tread constituting unsafe and unlawful passenger automobile tires. The rules incorporate all provisions of Minnesota Statute 169.723 (1976) as required by Minnesota Statute 169.722 (1976).

The Department's authority to promulgate the proposed rules is contained in Minnesota Statute 169.722 (1976). One free copy of the proposed rules is available and may be obtained by writing to Department of Public Safety, 211 Transportation Building, St. Paul, Minnesota 55155. Additional copies will be available at the door on the date of the hearing.

Any person may request notification of the date on which the Hearing Examiner's Report will be available, after which date the agency may not take any final action on the rules for a period of five working days. Any person may request notification of the date on which the hearing record has been submitted (or resubmitted) to the Attorney General by the agency. If you desire to be so notified, you may so indicate at the hearing. After the hearing, you may request notification by sending a written request to the hearing examiner (in the case of the Hearing Examiner's Report), or to the agency (in the case of the agency's submission or resubmission to the Attorney General).

Notice is hereby given that 25 days prior to the hearing, a Statement of Need & Reasonableness will be available for review at the Department of Public Safety and at the Office of Hearing Examiners. The Statement of Need & Reasonableness will include a summary of all of the evidence which will be presented by the department at the hearing justifying both the need for and reasonableness of the proposed rules. Copies of the Statement of Need & Reasonableness may be obtained from the office of Hearing Examiners at a minimal charge.

Please be advised that Minnesota Statutes, Chapter 10A, requires each lobbyist to register with the State Ethical Practices Board within five days after he commences lobbying. Lobbying includes attempting to influence rule making by communicating or urging others to communicate with public officials. A lobbyist is generally any individual who spends more than $250 per year for lobbying or any individual who is engaged for pay or authorized to spend money by another individual or association and who spends more than $250 per year or five hours per month at lobbying. The statute provides certain exceptions. Questions should be directed to the Ethical Practices Board, 41 State Office Building, St. Paul, Minnesota 55155, phone (612) 296-5615.

STATE OF MINNESOTA
DEPARTMENT OF PUBLIC SAFETY

Elmer G. Novak
COMMISSIONER OF PUBLIC SAFETY

10/6/78
DATE

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE EDWARD G. NOVAK

COMMISSIONER OF PUBLIC SAFETY

In the matter of the Proposed Adoption of Rules of the State Department of Public Safety Governing Safe Operating Condition of Passenger Automobile Tires.

STATEMENT OF NEED AND REASONABLENESS

The above captioned rules are not amendments to existing rules of the Department of Public Safety.

The need to adopt these rules arises because of the statutory mandate of Minn. Stat. 169.722 (1976) that the Commissioner promulgate rules providing for the safe operating condition of tires for use on passenger automobiles. Section 169.724 deems it unlawful to operate an automobile unless it "is equipped with tires in safe operating condition in accordance with rules promulgated by the Commissioner." Until such rules are in effect, enforcement action cannot be taken under the provisions of the unsafe tire law, Minn. Stat. 169.721 - 169.727 (1976).

Adoption of rules prescribing the safe operating condition of passenger automobile tires will promote traffic safety by providing standards enforceable by police and the courts. In addition, promulgation of the rules will provide protection to consumers because Minn. Stat. 169.726 forbids the sale of a passenger automobile equipped with one or more tires not in conformance with such rules.

Various studies have clearly demonstrated that defective tires are a contributing factor in motor vehicle accidents. Motor vehicles subject to the proposed rules make up the majority of vehicles on the highways. They are operated under widely varying load, speed, weather, and roadway conditions, and can deteriorate through use and because of damage. This necessarily affects the ability of the tire to accomplish its designed purpose. To reasonably serve its intended purpose of providing vehicle control, each tire must be sufficiently strong to support the weight or force imposed upon it when properly inflated. It must also possess those characteristics designed by the manufacture to promote controllability of the vehicle throughout the range of forces commonly encountered in turning maneuvers, acceleration and deceleration.

As required by Minn. Stat. 169.722, the proposed rules are based on and include the effects of tread wear and depth of tread, and they include all of the provisions of section 169.723. The definitions section of the proposed rules 11 MCAR 1.0167, gives technical definitions for various tire-related terms used in the proposed rules. The substantive portion of the rules, 11 MCAR 1.0168, specifies what constitutes an unsafe tire. One or more of seven conditions must exist for a tire to be unsafe and unlawful for use. The need for and reasonableness of the seven conditions are discussed below.

A. The proposed rules declare a tire unlawful for use if any part of the tire ply or cord is exposed. Tire plies consist of rubber-coated parallel cords which form the inner part of the tire. Their purpose is to provide basic structural strength to the tire. However, total tire strength is dependent upon the outer surfaces of

the plies being totally covered by sidewall and tread rubber. Where a tire is worn or damaged to the extent that a ply or cord is outwardly visible, the tire has been weakened and continued use of the tire inevitably results in failure at the location of the defect.

B. The proposed rules would also forbid the use of a tire with a bump, bulge, or separation of the sidewall, tread, or ply. These conditions indicate cord, ply or tread separations, any one of which renders the tire likely to fail. Total tire strength is achieved only when individual components of a tire are intact and each structural component is completely bonded to adjoining components.

C. A tire is considered unsafe, under the proposed rules if the tread depth is less than 2/32 of an inch measured in accordance with specified standards.

Tire tread is the outer layer of rubber on a tire which is in contact with the surface upon which a vehicle rests. It is the wearing surface of the tire. It also lends strength to the tire structure. In addition, it resists puncture and impact damage to the underlying plies and cords. The pattern of grooves or ridges on the wearing surface of the tire tread is essential to increase friction between the tire tread and the surface upon which the automobile is operated. The grooves and ridges promote stability in cornering and enhance traction during acceleration and gripping of the roadway surface during braking action of the vehicle. The grooves also provide an escape route for water when driving upon wet surfaces, thus increasing the friction between tire and roadway and preventing a condition known as "hydroplaning". As tire tread wears away, the depth of the tread groove decreases, the the volume of water which the tread groove can expel is diminished. If hydroplaning occurs, the friction between roadway and tire surface becomes negligible. Control of the vehicle under these circumstances is nearly impossible.

While sudden and unexpected tire failure can result in loss of control and potentially an accident, tire failure upon a highway without an accident can still create a hazardous situation. The disabled vehicle and the person changing the tire are in danger of being struck; also, their mere presence on high-speed highways can cause unsafe reactions by passing drivers with potentially serious consequences. Various studies indicate that automobiles equipped with one or more tires having a tread design depth of 2/32 of an inch or less are involved in a disproportionately greater number of accidents.[1] In addition, one study shows that tires with 2/32 of an inch of tread or less are ten times more likely to fail from puncture or other causes than new tires.[2]

D. The proposed rule also deems a tire unsafe if it is worn to the level of the tread wear indicators at specified locations. Federal Motor Vehicle Safety Standard No. 109 (F.M.V.S.S. 109) requires all passenger automobile tires manufactured on and after August 1, 1968, incorporate a tread-wear indicator that will provide a visual indication that the tire has worn to a tread depth of 2/32 of an inch. The indicators are molded into the bottom of the tread grooves at equally-spaced intervals around the circumference of the tire. They indicate when the effective life of the tire tread is expended by disrupting the tire tread pattern and emerging as smooth bands of rubber crossing the tire tread pattern at an angle of 90 degrees. This feature provides a feasible means for the owner of a vehicle to determine when excessive tread wear has occurred.

E. Non-highway use tires are not suitable for use upon automobiles using the streets and highways and the proposed rules would forbid use of tires not manufactured for highway use. Tire manufacturers design tires to serve specific needs,

including many applications which do not involve highway operation. Desirable tire structural and performance characteristics vary with the type of operation a tire will be used in. Consequently, a tire intended for a specific type of use may be totally unsuited for a different use.

Automobile tires manufactured for highway use in the United States must meet the laboratory test requirements of F.M.V.S.S. 109 for bead unseating resistance, strength, endurance, and high speed performance. The standard also specifies labeling requirements for passenger car tires, including load rating. Tires manufactured for other than highway use upon passenger automobiles are not subject to F.M.V.S.S. 109. Tires intended for highway use are readily identifiable by the letters "DOT" molded on or into the sidewall of the tire. Tires not intended for highway use are labeled to that effect, also by molding on or into the sidewall of the tire. Examples of special purpose tires unsuited for automobile use on highways are pneumatic tires designed for use on fork lift trucks, implements of husbandry, or aircraft.

F. The proposed rules also declare a tire unlawful for use if the tread or sidewall has cracks, cuts or snags deep enough to expose the body cords. Total tire strength is dependent upon the outer surfaces of the plies being totally covered by sidewall and tread rubber. When a tire is damaged to the extent that body cords are exposed, the tire is weakened and use of the tire could very probably result in failure at the location of the defect.

G. The proposed rules forbid the use of regrooved tires upon passenger automobiles except when the tire has been labeled with the word "Regroovable" molded on or into each tire sidewall. Tires labeled "Regroovable" are manufactured with extra undertread rubber to permit regrooving to renew tread pattern with a protective covering of at least 2/32 of an inch of tread material remaining between tire cords and the bottom of the tread grooves following regrooving. Regrooving a non-regroovable tire weakens the tire due to the removal of undertread materials essential to overall tire strength and increases the likelihood of tire failure.

[1]National Bureau of Standards, Technical Note 528, Tire Use Survey - The Physical Condition, Use, and Performance of Passenger Car Tires in the United States of America, May, 1970.

[1]A Second Study of Relationships Between Tire Tread Depth and the Likelihood of Accident Involvement, Highway Safety Foundation, Mansfield, Ohio, May, 1972.

[2]Baker, J. Stannard, and McIlraith, G. Declan, Use and Condition of Tires on Four-tired Vehicles on the Illinois Tollway--Tire Study 2, Traffic Institute, Northwestern University, Evanston, Ill., June, 1968.

The foregoing statement constitutes the verbatim affirmative presentation of the Department of Public Safety. No other direct evidence, testimony or argument will be presented at the hearing by the department.

STATE OF MINNESOTA
DEPARTMENT OF PUBLIC SAFETY

November 2, 1978

Edw. G. Novak
COMMISSIONER OF PUBLIC SAFETY

STATE OF MINNESOTA

COUNTY OF RAMSEY

In the matter of the Proposed Adoption of Rules of the State Department of Public Safety Governing Safe Operating Condition of Passenger Automobile Tires.

AFFIDAVIT OF RECEIPT OF SECRETARY OF STATE'S LIST

Beverly Zollars, being duly sworn on oath deposes and says:

1) That she is an employee of the Department of Public Safety of the State of Minnesota.

2) That on the 26th day of October 1978, she went to the Secretary of State's office of the State of Minnesota and requested a current list of all representatives of associations or other interested groups or persons who had registered their names with the Secretary of State for the purpose of obtaining notices of public hearings relating to the promulgation of rules pursuant to Minn. Stat. 15.0412 (1976).

3) That on the 26th day of October 1978, in response to the above request, the Secretary of State provided her with such a list, a copy of which is attached hereto and incorporated by reference.

Beverly A. Zollars

Subscribed and sworn to before me

this 26th day of October,

1978

ROY W. PETERSON
Notary Public, Ramsey County, Minn.
MY COMMISSION EXPIRES
June 8, 1979

Roy W. Peterson

STATE OF MINNESOTA

COUNTY OF RAMSEY

In the matter of the Proposed Adoption
of Rules of the State Department of
Public Safety Governing Safe Operating
Condition of Passenger Automobile Tires.

AFFIDAVIT OF MAILING

Beverly Zollars, being first duly sworn, deposes and says:

That on the 27th day of October, 1978, at the City of St. Paul, County of Ramsey, State of Minnesota, she served the Notice of Hearing to all persons on the Secretary of State's list be depositing in the United States mail at said City of St. Paul, a true and correct copy thereof, properly enveloped, with postage prepaid.

Beverly A Zollars

Subscribed and sworn to before me

this 31st day of October

197 8

ROY W. PETERSON
Notary Public, Ramsey County, Minn.
MY COMMISSION EXPIRES
June 8, 1979

Roy W. Peterson

STATE OF MINNESOTA

COUNTY OF RAMSEY

In the matter of the Proposed Adoption
of Rules of the State Department of
Public Safety Governing Safe Operating
Condition of Passenger Automobile Tires.

CERTIFICATE

I hereby certify that the enclosed 585 & 2 sheets general labels and Public Safety list constitute the complete list of persons, associations, and other interested groups who as of 10 o'clock A. M., this 26th day of Oct., 1978, have requested pursuant to Minn. Stat. 15.0412, subd. 4 (1976), 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.

SECRETARY OF STATE

JOAN ANDERSON GROWE

Joan Anderson Growe

BY Kathy Yoeman

The Following Names on the General Mailing List
can be sent through Interoffice Mail

Brubacher, Richard, Comm. Adm., 208 Adm. Bldg.

Christiansen, Fredrik, Rm 505, Capitol Square Bldg.

Coleman, Nicholas, 208 State Capitol

Consumer Services Dept. Comm., 5th Floor, Metro Square Bldg.

Develop Disabilities Programs, State Plan, 101 Capitol Square Bldg.

Dispatch Pioneer Press, Press Rm, State Capitol

Ethics Comm., Rm 410, State Office Bldg.

Farseth, Paul, Welfare Dept., 690 N Robert Street, St. Paul

Giel, David, Rm B-28, State Capitol

House Appropriations Comm., Rm 109 State Capitol

Human Rights, 200 Capitol Square Bldg.

Human Services 414 Lafayette Rd., 5th Floor

Leg. Ref. Lib-Z. Dewitt, Rm 111, State Capitol

Levey, Jess, Met. State Univ., Metro Square Bldg., Rm 121

McLellan, Larkin, 215 Adm. Bldg. St. Capitol
Maclin, Allen -Spec.Assist. Atty. Gen. 720 American Center Bldg. St..Paul
Malone, E.I., Comm. Labor & Industry, 444 Lafayette Rd., 5th Floor

Met. Waste Control Comm., 350 Metro Square Bldg.

Metropolitan Council Library, 300 Metro Square

Miller, Michael, Admin. Agencies Div., G19K State Admin. Bldg

Minn Comm for Handicapped, Metro Square

Minn Pollution Control Agency, 1935 W Co Rd B2, Roseville

Minn State Retirement System, 529 Jackson St

Minn Water Resources Bd, Rm 206, 555 Wabasha St.

Mpls Star Press Room, State Capitol

Office of the Governor, 130 State Capitol

Schmidt, H.W. Teachers Retirement, 302 Capitol Square Bldg.

Schutz, Linda, Rm 328 Capitol Bldg.

Senate Coun. Office, Room 480, State Office Bldg.

Senate Finance Comm., 121 State Capitol

Senate Gov. Op. Comm. Rm 303, State Capitol

Senator Robert J. Tennessen, 309 State Capitol

Vandervoort, T.J., Met. Waste, 350 Metro Square Bldg.

Whitlock, Marshall, Room 433, State Office Bldg.

Wooten, James A. Personnel Director, Dept. of Personnel 3fl.Space Center

Ed, Box 144, Emmons, 56029

, James M., Felhaber, Larson et al, W-1080 1st Nat. Bank Bldg., St Paul 55101

as, Dr. Howard, 329 Brown Hall, St Cloud State College, St Cloud 56301

ta Distillers of Long Prairie, Long Paririe, MN 56347

, Bill, 513 South Section, Spring Valley 55975

, Walter, 459 Rice Street, St Paul 55103

, J.B., Driver Education Range, 1000 N Snelling Ave, St Paul 55108

Motorcycle Escort Club, Inc. PO Box 3264, St Paul 55101

, Mork & Henefield, Attorneys, 1st Nat Bank Bldg., Blooming Prairie 55917

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

MACLIN ALAN ASST ATTY GEN
720 AMERICAN CENTE BLDG
ST PAUL MN
55101

ST PAUL MN
55102

MAHCF RICK CARTER
2850 METRO DR SUITE 431
BLOOMINGTON MN
55420

MALECKI JAMES
1 SO STATE ST
NEW ULM MN
56073

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

MANKATO STAT STUDENT SENA
CENTENNIAL STUDENT UN
MANKATO MN
56001

MANKATO STATE STUDENT ASSN
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

MCCLURG EUNICE
1061 109TH AVE NE
BLAINE MN
55434

MCDONALD PHILIP M
2077 SELBY AVE
ST PAUL MN
55104

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

MCKIBBON MRS SHIRLEY
11 EVERGREEN LN
BABBITT MN
55706

MCNEILLY GREG MNDSVIEW ED AS
41 SHERBURNE AVE
ST PAUL MN
55103

MEIEROTTO, JOAN
1794 SO LEXINGTON
ST PAUL MN
55118

MET. WASTE CONTOL COMM.
350 METRO SQ BLG
ST PAUL MN
55101

MET TFR MEN ASSN A ROSENTHAL
1821 UNIV AVE
ST PAUL MN
55104

METROPOLITAN COUNCIL LIBRARY
300 METRO SQUARE
ST PAUL MN
55155

MEYER HERBERT
10824 ZENITH AVE S
BLOOMINGTON MN
55431

MIDLAND GLASS-HD SPURLING
PO BOX 69
SHAKOPEE MN
55379

MILLER M ADMIN AGENCIES DIV
G19K STATE ADM BLDG
ST PAUL MN
55155

MILLER PAUL J PHARMACY SERV
ST MARYS HOSP
ROCHESTER MN
55901

MILLER RICHARD A
1020 PLYMOUTH BLDG
MPLS MN
55402

MILLER TOM
2311 PILLSBURY AVE S
MPLS MN
55404

MINN APT ASSN
GRIGGS-MIDWAY BLDG
ST PAUL MN
55104

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 VOL SOC SERVICE
1821 UNIV SUITE 389
ST PAUL MN
55114

MINN ASSN WATERSHED DIST'S

ADA MN
56510

MINN CHAP ASSOC BLDRS-CON
7204 W 27TH ST
MPLS MN
55426

MINNEAPOLIS MN
55403

ST PAUL MN
55114

ADA MN
56510

MPLS MN
55426

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

MINNESOTA FARMERS UNION
1717 UNIVERSITY AVE
ST PAUL MN
55104

MINN FOOD RETAILERS ASSN
555 WABASHA
ST PAUL MN
55101

MINN GOV ENG COUNCIL
2400 SHERWOOD HILL RD
MINNETONKA MN
55343

MINN HEREFORD-LJ SCHAFER

BUFFALO LAKE MN
55314

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

MINN HWYS MANAGEMENT SERVICE
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

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

MINN PETROLEUM COUNCIL
1020 NORTHERN FED BLDG
ST PAUL MN
55102

MINN POLLUTION CONTROL AGCY
1935 W CO RD B2
ROSEVILLE MN
55113

MINN POULTRY & HATCHERY ASSN
BOX 158
MADELIA MN
56062

MINN RESTAURANT ASSN
2001 UNIVERSITY AVE.
ST PAUL MN
55104

MINN RETAIL FED INS
131 METRO SP
ST PAUL MN
55101

MINN RETAIL HARDWARE ASSN
3033 EXCELSIOR BLVD 313
MPLS MN
55416

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 EMP UNION COUNC 6
236 E PLATO BLVD
ST PAUL MN
55107

MINN STATE MEDICAL ASSOC
STE 900 AM NATL BK BLDG
STPAUL MN
55101

MINN STATE RETIREMENT SYSTEM
529 JACKSON ST
ST PAUL MN
55101

MINN TEAMSTERS CREDIT UNI
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 COMM
600 2ND ST
HUDSON WI
54016

MIXA FRANK LK MNTKA CONS DIS
402 E LAKE ST
WAYZATA MN
55391

MN AUTOMOBILE DEALERS ASSN
277 UNIV AVE
ST PAUL MN
55103

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

4901 W 77TH ST

HUDSON WI
54016

WAYZATA MN
55391

ST PAUL MN
55103

ST.PAUL MN
55101

MINNESOTA AFL-CIO
175 AURORA AVE
ST PAUL MN
55103

MN.BD OF NURSING
717 DELAWARE ST SE
MPLS MN
55414

MN ELECTRICAL ASSN
3100 HUMBOLT SO
MPLS MN
55408

MN GRAPHIC DESIGNERS ASSO
PO BOX 24272
MPLS MN
55424

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

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

MN SOC SERV ASS J HOOD
614 PORTLAND
ST PAUL MN
55102

MN ST PHARMACEUTICAL ASSN
2469 UNIVERSITY AVE
ST PAUL MN
55114

MN STATE SER BLIND-K NATARDY
1745 UNIVERSITY AVE
ST PAUL MN
55104

MOFFITT R C
RM 301 M MPLS CITYHALL
MPLS MN
55415

MOOD R BLOOMINGTON HLTH DEPT
10200 PENN SO
BLOOMINGTON MN
55431

MORTON BUILDINGS INC
R #1
FOLEY MN
56329

MOSS DR JEROME
125 PEIK 159 PILLSBURY
MPLS MN
55455

MOSTCA
PO BOX J
PERHAM MN
56573

MOTOR VEHICLE MFRS ASSN
411 MAIN ST (215)
ST PAUL MN
55102

MPIRG
BOX 45 ST MARYS COLLEGE
WINONA MN
55987

MPLS ASSN RETARDED CITIZENS
3100 W LAKE ST
MPLS MN
55416

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

MT OLIVET ROLLING ACRES
R 1 BOX 576
EXCELSIOR MN
55331

MURPHY DIANA E
4200 IDS-LINDQUIST VENN
MPLS MN
55402

MURPHY PATRICK SSR INC
BOX 986 COURTHOUSE STA
ARLINGTON VA
22216

MURPHY PATRICK DUFFY
1440 SUMMITT AVE
ST PAUL MN
55105

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

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

NELSON HOWARD I

LINDSROM MN
55045

NEREN MADONNA
376 NEAL AVE S
AFTON MN
55001

RM 206 555 WABASHA ST

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55114

MOORHEAD MN
56560

LINDSTROM MN
55045

AFTON MN
55001

NEUMAN RALPH W
RT 2 BOX 125
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NO SUB MONTESSORI-S SADDLER
2487 HELEN COURT
NO ST PAUL MN
55109

NORTH CENTRAL ELEC ASSN
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BATTLE LAKE MN
56515

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

NURSING HOME RES ADV CO.
111 E FRANKLIN S210
MPLS MN
55404

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

NW COUNTRY ELEVATOR ASSN
802 GRAIN EXCH BLDG
MPLS MN
55415

NW REG. DEV. COMM
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CROOKSTON MN
56716

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BROOKLYN CTR MN
55429

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55402

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ST PAUL MN
55101

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

OLSON KATHLEEN
192 SEYMOUR AVE SE
MPLS MN
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OTTER TAIL POWER CO.
215 S. CASCADE ST.
FERGUS FALLS MN
56537

PARKER SANDY
7480 CHANHASSEN ROAD
EXCELSIOR MN
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56201

PAYNE COL ALVIN

DEGRAFF MN
56233

PAYNE WM B
2400 FIRST NATL BK BLDG
MPLS MN
55402

PETERSEN DOUG ESIDE NEIGHBOR
HOOD SERV 1929 2ND STNE
MPLS MN
55418

PETERSON MYRON D
ROUTE 2 BOX 99
SACRED HEART MN
56285

PFEIFER AND SHULTZ, INC
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MPLS MN
55416

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PHILLIPS LEGISLATIVE SERVICE
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40 CENTRAL PARK S
NEW YORK NY
10019

POPOVICH PETER S
314 MINN BLDG
ST PAUL MN
55101

PORTER DAVID
3002 27 AVE S
MPLS MN
55406

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

55406

56175

55101

55430

POYZER ROBT
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FERGUS FALLS MN
56357

PRAUSE JOS.C.
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COON RAPIDS MN
55433

PROCTOR&GAMBLE L THEOHAROUS
IVORYDALE TECH CENTER
CINCINNATI OH
45217

PULSCHER RBT SPRINGSTED I
813 OSBORN BLDG
ST PAUL MN
55102

RADMAN RICHARD-LABOR TEMPLE
418 AUDITORIUM
ST PAUL MN
55102

RALPH BURKE ASSOCIATES
5200 W 73RD ST
MPLS MN
55435

RAMSEY CO MEDICAL SCC
908 AM NATL BK BLDG
ST PAUL MN
55101

RAUENHORSTCORP-RONALD G KIRK
7900 XERXES S S-2200
MPLS MN
55431

REAGAN MICHAEL
% MINN LEARNING CTR
BRAINERD MN
56401

REARDON MRS HELEN
1125 S E 6TH ST
WILLMAR MN
56201

REID DAVID H
6469 N GRAHAM RD
INDIANAPOLIS IN
46220

RED OWL STORES INC
215 E EXCELSIOR AVE
HOPKINS MN
55343

REGION FIVE REG. DEV. COMM.
102 6TH ST N
STAPLES MN
56479

REGION NINE DEV. COMM.
709 N FRONT ST
MANKATO MN
56001

REINO O LAINE 3M COMPANY
3M CENTER
ST PAUL MN
55101

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

RENQUIST ARTHUR NSP CO
414 NICOLLET MALL
MPLS MN
55401

RICHARDSON THOS
7851 METRO PKWY S 103
MPLS MN
55420

RICHARDS MONTGOMERY ET AL
1430 RAND TOWER
MPLS MN
55402

RIEKE DAVID
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MPLS MN
55440

ROE DAVID
175 AURORA
ST PAUL MN
55103

ROBBIE JOSEPH
904 CARGILL BLDG NO CTR
MPLS MN
55402

ROBERTS DR ALAN
BOX 297 MAYO U OF M
MPLS MN
55455

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

ROSS ALFRED
6356 WARE RD
LINO LAKES MN
55014

ROSS ROY J
CLK TREAS
LITCHFIELD MN
55355

SANFORD S M
7000 PORTLAND AVE
RICHFIELD MN
55423

SAX DOVE & STENSON
310 ENDICOTT BLDG
ST PAUL MN
55101

RICHFIELD MN
55423

ST PAUL MN
55101

SE MN REG DEV COMM
301 MARQ BK BLDG
ROCHESTER MN
55901

SPRAGUE CHARLOTTE B
AREA HOSPITAL BOX 339
WINDOM MN
56101

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

SW REGIONAL DEV COMM
2811 BDWY
SLAYTON MN
56172

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

SCHAEN ETHEL
1745 UNIVERSITY AVE
ST PAUL MN
55104

SCHLICHT REV ROBT
611 W MAIN ST
BELLE PLAINE MN
56011

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

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

SCHMIDT WARREN WELLCOME MHS
GARDEN CITY MN
56034

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

SCOTT CTY BLDG OFFICIAL
428 SO HOLMES ST
SHAKOPEE MN
5537

SELECTVISION INC FR VALEN
1 DAG HAMMARSKJOLD PL
NEW YORK NY
10017

SENATE COUNSEL OFFICE
ROOM 480 STATE OFF BLDG
ST PAUL MN
55055

SENATE FINANCE COMMITTEE
ROOM 121 STATE CAPITOL
ST PAUL MN
55155

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

SHABATURA EUGENE H
2833 LAKE AVE SO
DULUTH MN
55811

SHAW ROBERT M
616 MOBIL OIL BLDG
MPLS MN
55402

SIAS JACK W
BOX 4366-1573 SELBY AVE
ST PAUL MN
55104

SILVERMAN JUDITH
8545 W 28TH ST
ST LOUIS PARK MN
55426

SITE ENGINEER INC
12 OLD DEERFIELD RD
WELCH MN
55089

SIX EAST REG. DEV. COMM.
311 W 6TH ST
WILLMAR MN
56201

SMERIKA WM.
BOISE CASCADE PAPERS
INTL FALLS MN
56649

SMITH BOB III
PIONEER BLDG
ST PAUL MN
55101

SMITH MICHAEL
75 DE KALB AVE
BROOKLYN NY
11201

56649

55101

BROOKLYN NY
11201

SNELL LYN
BOX 314
EDEN VALLEY MN
55329

SNYDER, R.W. U OF M
RM 248C CLASS OFF BLDG.
ST PAUL MN
55108

SODERBERG HAROLD J
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

SODERMAN ANTHONY
1414 FOSHAY TOWER
MPLS MN
55402

STANSFIELD ARLENE LAND OLKS
PO BOX 116
MPLS MN
55440

STATE & FEDERAL AGENCIES
1101-15TH NW
WASHINGTON DC
20005

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

STATE OF MN BLDG CODE DIV
408 METRO SQ BLDG
ST PAUL MN
5510

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

STEELWORKERS CREDIT UNION
BOX 250
BABBITT MN
55706

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

SULLIVAN JEANETTE
CDIC SW STATE UNIV
MARSHALL MN
56258

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

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

SWANSON DALE
P O BOX 339
FOREST LAKE MN
55025

SWANSON MORTIMER C
5824 FRANCE AVE S
EDINA MN
5541C

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

TENNESSEN SEN ROBERT J
RM 309 STATE CAPITOL
ST PAUL MN
55165

THOMPSON HESSIAN ET AL
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

THORNTON PETER J PLBG UN
107 SO 15TH AVE W
VIRGINIA MN

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

TOWNSHIP OF WHITE BEAR
1281 HAMMOND RD
WHITE BEAR LK MN
5511

TWIN CITIES PIPING IND ASSN
2829 UNIV SE SUITE 304
MPLS MN
55414

UNION STOCK YARDS
ATTN PRES
SO ST PAUL MN
55075

UTLEY JOHN
4610 IDS CENTER
MPLS MN
55402

VANDERVOORT T J MET WASTE
350 METRO SQUARE BLDG
ST PAUL MN
55101

55075

55402

ST PAUL MN
55101

VAN DRAKE STEPEN R
PO BOX 2134
TRIPOLI LIBYA N
ARAB

VAN EVERA MUNDT ET AL
700 TORREY BLDG
DULUTH MN
55802

VERRILL JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN
55812

VIITALA, W.C. HONEYWELL
HONEYWELL PLAZA
MPLS MN
55408

VILLAGE OF WOODBURY
2100 RADIO DRIVE
WOODBURY MN
55042

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

VOS LEROY
2137 BURNS AVE
ST PAUL MN
55119

WALTERS THOMAS MN MFG HOUSE
4530 W 77TH ST STE 227
MPLS MN
55435

WALZ SAM CO ADMINISTRATION
ANOKA CTY COURTHOUSE
ANOKA MN
55303

WAMPLER LINUS DIR USW OF AM
609 PROVIDENCE BLDG
DULUTH MN

WANQUIST ALLEN
RM 252 FEDERAL BLDG
ST PAUL MN
55101

WASHINGTON COUNTY
14900 61ST ST NO
STILLWATER MN
5508

WATERS, DONNA M.
110506 WINDMILL COURT
CHASKA MN
55318

WELK G V NORTHERN STATES
414 NICOLLET MALL
MPLS MN
55401

WEST CENTRAL REG. DEV.
ADM BLDG,COMMUNITY COLL
FERGUS FALLS MN
56537

WHITLOCK A G
ECON LAB OSBORN BLDG
ST PAUL MN
55102

WHITLOCK MARSHALL
RM 433 STATE OFFICE BLD
ST PAUL MN
55155

WHITING RALPH
7316 BAILEY ROAD
NEWPORT MN
55055

WILCOX J PATRICK
1220 NORTHERN FED BLDG
ST PAUL MN
55102

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

WILEY ENTERPRISES
101 5TH AVE SE
OSSEO MN
55369

WILLETTE MARY
2711 W 47TH STREET
MPLS MN
55410

WILSON R GARY PPG INDUST
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 D D
401 FIRST FED BLDG
ST PAUL MN
55101

WYANT CLINTON W ATTY

ATKIN MN
56431

ZIMMERMAN & OFFERMAN
CAMBRIDGE STATE HOSP
CAMBRIDGE MN
55008

LABELLE JUANITA MRS
5816 AQUILA AVE NO
NEW HOPE MN
55428

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

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 SE
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

LEG.REF.LIB-Z. DEWITT
RM 111 STATE CAPITOL
ST PAUL MN
55155

LEG REPORT SERV-P STURDEV
PO BOX 3259
ANNAPOLIS MD
2140

JAIN NIRMAL ENIV PROCESS
1220 GLENWOOD AVE
MPLS MN
55405

JASPER GLEN
ROUTE 1
MONTROSE MN
55363

JENOS INC
525 LAKE AVE SO
DULUTH MN
55801

JENSEN ARTHUR,CITY CLK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

JENSEN CARL A
127 E MAIN ST
SLEEPY EYE MN
56085

JENSEN MRS GAYNOLD
111 WEST 107TH ST
MPLS MN
55420

JOHANSEN BUS SERV INC
19 DAYTON RD
CHAMPLIN MN
55316

JOHNSON & SANDERSON
ST MARYS HOSPITAL
ROCHESTER MN
55901

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

JOHNSON G ROBERT
4344 IDS CENTER
MPLS MN
55402

JOHNSON LEROY
9939 BLUEBIRD ST NW
COON RAPIDS MN
55433

JOHNSON M.D. FRUNDT & FRU

BLUE EARTH MN
56013

JOHNSON LANCE J
265 S LAFAYETTE RD
ST PAUL MN
55107

JONES C NORTHSIDE RES REDEV
1800 OLSON MEMORIAL HWY
MPLS MN
55411

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

KJERVIK DIANE
4302 POWEL HALL U OF M
MPLS MN

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
ST CLOUD STATE
ST CLOUD MN
56301

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

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

KROEGER CHARLES
122 NW 7TH STREET
FARIBAULT MN
55021

KRONLOKKEN J E
10048 NORD RD
BLOOMINGTON MN
55437

KROON H CLIFTON
210 E WALNUT
MANKATO MN
56001

KVB ENGINEERING INC
600 S CO RD 18
MPLS MN
55426

LABELLE JUANITA MRS
5816 AQUILA AVE NO

LAKE SUPERIOR INDUSTRIAL BUR
828 FIRST AM. BK. BLDG.

LANAHAN E F - SIBLEY CO
184 E 6TH ST

HEADWATERS REG DEV. COMM
BOX 584 MENTAL HEALTH
BEMIDJI MN
56601

HEALTH MANPOWER C LARSON
717 DELAWARE ST SE
MPLS MN
55440

HEANEY BILL
30 W SUPERIOR ST
DULUTH MN
55802

HEARING EX.OFF. M GREENBE
1745 UNIV AVE
ST PAUL MN
55104

HEIM PAUL M
3944 IDS CENTER 80 S 8
MPLS MN
55402

HEISENFELT WM
BOX 516
BEMIDJI MN
56601

HELTZER JAMES DAYTON HUDSON
777 NICOLLET MALL
MPLS MN
55402

HENDRICKSON A WM
100 FREEMAN DRIVE
ST PETER MN
56082

HENDRICKSON MRS VIRGINIA
3324 COUNTRY WOOD DR
BURNSVILLE MN
55337

HINRICHSEN PATRICK
MANKATO FREE PRESS
MANKATO MN
56001

HOLEY GEORGE
1509 SW SIXTH STREET
FARIBAULT MN
55021

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

HOLT JOHN
517 4TH ST NW
FARIBUALT MN
55021

HOULE MELVIN
881 W HWY 96
SHOREVIEW MN
55112

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HULSTRAND ANDERSON & LARSON
PO BOX 130
WILLMAR MN
56201

HUMAN RIGHTS
200 CAPITOL SQ BLDG
ST PAUL MN
55101

HUSEBYE, CRAIG J.
5036 FRANCE S.
EDINA MN
55410

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

HYLAND DEAN
1501 W 50TH ST
MPLS MN
55419

IMS PAUL

ECHO MN

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

INGRAM ALAN NASW MN CH
22 NO DALE ST
ST PAUL MN

INGVALSON VERN MN.FARM BU
1976 WOODDALE BOX 43370
ST PAUL MN
55164

INS FED OF MINN
902 SOO LINE BLDG
MPLS MN
55402

INTERSTATE POWER RW STEELE
1000 MAIN ST
DUBUQUE IA
52001

IVERSON DR JOS DEPT ED
ST OLAF COLLEGE
NORTHFIELD MN
55057

IZAAK WALTON MN DIV
111 E FRANKLIN RM-210
MPLS MN
55404

JAIN NIRMAL ENIV PROCESS
1220 GLENWOOD AVE

JASPER GLEN
ROUTE 1

JENOS INC
525 LAKE AVE SO

JENSEN ARTHUR,CITY CLK
2215 W OLD SHAKOPEE RD

FRISON FRANK NECA
RM 305 200 SO ROBERT
ST PAUL MN
55107

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 DEPT
PO BOX 800
AUSTIN MN
55912

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 HAUER
3901 GOLDEN VALLEY RD.
MPLS. MN
55422

GODIN RALPH J
3824 47TH AVE SO
MPLS MN
55406

GOLDBERG PROF MELVIN
WM MITCHELL COL OF LAW
ST PAUL MN
55105

GOODMAN DF TEL CABLE TV
302 E SUPERIOR
DULUTH MN
55802

GRAHAM THOS H
854 MIDLAND BK BLDG
MPLS MN
55401

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

GREATER MET AREA HOSPITALITY
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

GRUMMERT REV DONALD
1435 ADAMS ST
MPLS MN
55413

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 WARREN A SKELGAS
PO BOX 1650
TULSA OK
74102

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

HARRY RICK
RT 1 BOX 138
KETTLE RIVER MN
55757

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

HAYES,THOMAS W
700 SELLWOOD BLG
DULUTH MN
55812

HART PATRICK V
112 E LIBERTY BOX 3271
MANKATO MN
56001

HARTFELDT WILL
434 HAMM BLDG
ST PAUL MN
55102

HAVEN ROBT TWIN TN TREATMENT
1706 UNIV AVE
ST PAUL MN
55104

HEAD & TRUHN
1007 SCO LINE BLDG
MPLS MN
55402

HEADWATERS REG DEV. COMM
BOX 584 MENTAL HEALTH

HEALTH MANPOWER C LARSON
717 DELAWARE ST SE

HEANEY BILL
30 W SUPERIOR ST

HEARING EX.OFF. M GREENBE
1745 UNIV AVE

ENDERSON WILLIAM
3644 NICOLLET AVE
MINNEAPOLIS MN
5540

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

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

ERDMAN ROGER TENNANT CO
701 N LILAC DR
MPLS MN
55441

ERICKSON BURDETTE ABI CONT
BOX 942
VIRGINIA MN
55792

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

ESSE KENNETH
4801 W 50TH ST
EDINA MN
55424

ETHICS COMM
RM 410 STATE OFF BLDG
ST PAUL MN
55155

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

EWING MRS WM
42 ASTAR RD
BABBITT MN
55706

FABISH MIKE INTL UN OP EN
307 1ST ST W
VIRGINIA MN
55792

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

FARMERS ELEVATOR ASSN
852 GRAIN EXCH BLDG
MPLS MN
55415

FARRELL FRANK BUR NCR
RM 1180 176 E 5TH ST
ST PAUL MN
55101

FARSETH PAUL FOOD STAMPS
WELFARE DEPT 690 N ROBT
ST PAUL MN

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

FILTER LOREN
BOX 36
BRITT MN
55701

FINLEY JAMES F
920 MINN BLDG
ST PAUL MN
55101

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

FITZGERALD DR BOB
3007 LYNDALE AVE SO
MPLS MN
55408

FITZPATRICK LEO
8138 HENSLOWE AVE S
COTTAGE GROVE MN
55016

FLEMING FREDERICK A
1860 HIGHLAND PARKWAY
ST PAUL MN
55116

FLADLAND CLINT MN L&P BUR
795 RAYMOND AVE
ST PAUL MN
55114

FORBES GORDON MINN RRS ASSN
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 TR
426 PORTLAND
MPLS MN
55415

FREDIN CONRAD M
811 FIRST NATL BK BLDG
DULUTH MN
55802

FREDLUND MRS PHYLLIS
RR 4 BOX 37
CANBY MN
56220

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

FRIESEN MILLER A
RAHR BD 624 13TH ST S
VIRIGINIA MN
55792

FRISON FRANK NECA
RM 305 200 SO ROBERT

GALVIN M J JR
W2162 1ST NATL BK BLDG

GARDNER HDW - R A JOHNSON

COUNTY ATTYS COUNCIL
40 NO MILTON ST STE 106
ST PAUL MN
55104

COUNTY OF OLMSTED
1421 SE 3RD AVE
ROCHESTER MN

CRAVEN NORMAN
10637 THOMAS AVE S
BLOOMINGTON MN
55431

CROW WING CO PLANNING & A
COURT HOUSE
BRAINERD MN
56401

CUSHMAN J S DAYTON HUDSON
700 NICOLLET MALL
MPLS MN
55402

DAHLKE LOIS M
118 S EAGLE ST
BELLE PLAINE MN
56011

DAILEY THOMAS ECONOMICS L
370 WABASHA ST
ST PAUL MN
55102

DANKERS, KENNETH
1200 WEST FOURTH STREET
RED WING MN
55066

DANIELSON RODNEY L
418 AUDITORIUM
ST PAUL MN
55102

DAWSON JEAN MN GOV'T REPORT
ROOM B12 CAPITOL
ST PAUL MN
55155

DAYTON CHAS SIERRA CLUB
800 MIDLAND BANK BLDG
MPLS MN
55401

DEVELOP DISABILITIES PROGRAM
STATE PLAN 101 CAP SQ
ST PAUL MN
55155

DICKINSON MRS JOANNE
BOX 1065
MARSHALL MN
56258

DIEHL JOHN
26 KENWOOD PKWY
ST PAUL MN
55105

DISPATCH PIONEER PRESS
PRESS RM STATE CAPITOL
ST PAUL MN
55101

DORSEY MARQUART
2400 1ST NATL BANK BLDG
MPLS MN
55402

DOUGLAS BELL ET AL
2212 AM.NATL BK BLDG
ST PAUL MN
55102

DOW CHEMICAL
47 BLDG
MIDLAND MI
48640

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

DUPONT MIKE
5720 EXCELSIOR BLVD
MPLS MN
55416

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

E CENTRAL REG. DEV. COMM
COURTHOUSE 18 N VINE ST
MORA MN
55051

EBELING EDWARD H.
161 W. MAIN
PERHAM MN
56573

ECKLUND WM EELLHABER-LARSON
W 1080 1ST NATL BANK
ST PAUL MN
55101

EDEVOLD RUTH
PO BOX 248
BEMIDJI MN
56601

EICHTEN DANIEL
3794 HAZEL
WHITE BEAR LK MN
55110

ELDER DR JAMES B
11140 WASHBURN AVE SO
BLOOMINGTON MN
55431

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

ELMER EDWIN W
2901 PLEASANT AVE
MPLS MN
55408

EMERICK RICHARD A
1908 IDS CENTER
MPLS MN
55402

ENDERSON WILLIAM

ENNIS A F BOISE CASCADE
PO BOX 713

ENV SERV-GEN RESOURCE CORP
6340 INDUSTRIAL DR

ERDMAN ROGER TENNANT CO
701 N LILAC DR
MPLS MN

MPLS MN

CITY OF RAMSEY
14100 ST FRANCIS DR
ANOKA MN
55303

CITY OF REDLAKE FALLS
BOX 448
RED LAKE FALL MN
56750

CITY OF RICHFIELD
6700 PORTLAND AVE
RICHFIELD MN
55423

CITY OF ROBBINSDALE
4221 LAKE RD
ROBBINSDALE MN
55422

CITY OF ROCHESTER
1421 3RD AVE SE
ROCHESTER MN
55901

CITY OF ROSEMOUNT
BOX 455
ROSEMOUNT MN
55068

CITY OF ROSEVILLE
2701 NO LEXINGTON AVE
ROSEVILLE MN
55113

CITY OF ST ANTHONY
2900 KENZIE TERRACE
MPLS MN
55418

CITY OF ST CLOUD
CITY HALL
ST CLOUD MN
56301

CITY OF ST LOUIS PARK
5005 MINNETONKA BLVD
ST LOUIS PARK MN
55416

CITY OF ST PAUL
445 CITY HALL
ST PAUL MN
55101

CITY OF ST PETER
BOX 270
ST PETER MN
56082

CITY OF SAVAGE
12305 QUENTIN AVE SO
SAVAGE MN
55378

CITY OF SHAKOPEE
129 E 1ST AVE
SHAKOPEE MN
55379

CITY OF SHOREVIEW
4665 NO VICTORIA ST
SHOREVIEW MN
55112

CITY OF SOUTH ST PAUL
125 3RD AVE NO
SO ST PAUL MN
55075

CITY OF SPRING LAKE PARK
1301 81ST AVE NE
SPRING LAKEPK MN
55432

CITY OF THIEF RIVER FALLS
BOX 528
THIEF RIVERFA MN
56701

CITY OF WARREN
CITY HALL
WARREN MN
56762

CITY OF WAYZATA
600 RICE STREET
WAYZATA MN
55391

CITY OF WHITE BEAR LAKE
250 MILLER AVE
WHITE BEAR LK MN
55110

CITY OF WINDOM
444 9TH STREET
WINDOM MN
56101

CITY OF WOODBURY
2100 RADIO DRIVE
WOODBURY MN
5504·

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

CLAUSEN PHILLIP
2307 STANDISH ST
ST PAUL MN
55108

CLAWSON CONNIE
HELP CT 317-17TH AV SE
MPLS MN

COLEMAN NICHOLAS
208 STATE CAPITOL
ST PAUL MN
55155.

COLHAPP TED
1294 VALLEY VIEW ROAD
CHASKA MN
55318

COLLIN LAURENCE
RT 2
ISANTI MN
55040

COMMUNITY DESIGN CENTER
118 E 26TH ST
MPLS MN
55404

CONCORDIA COLLEGE
DEAN
MOORHEAD MN
56560

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

COUNTY ATTYS COUNCIL
40 NO MILTON ST STE 106

COUNTY OF OLMSTED
1421 SE 3RD AVE

CRAVEN NORMAN
10637 THOMAS AVE S

CROW WING CO PLANNING & A
COURT HOUSE

ITY OF FRIDLEY
431 UNIVERSITY AVE NE
RIDLEY MN
5432

CITY OF GOLDEN VALLEY
7800 GOLDEN VALLEY RD
GOLDEN VALLEY MN
55427

CITY OF HAM LAKE
15544 CENTRAL AVE NE
ANOKA MN
55303

CITY OF HASTINGS
100 SIBLEY ST
HASTINGS MN
55033

ITY OF HOPKINS
010 1ST ST SO
OPKINS MN
5343

CITY OF HUTCHINSON
37 WASHINGTON AVE WEST
HUTCHINSON MN
55350

CITY OF INVER GROVE HTGS
8659 COURT HOUSE BLVD
INVER GROVE MN
55075

CITY OF JACKSON
CITY HALL
JACKSON MN
56143

ITY OF LACRESCENT
O BOX 142
ACRESCENT MN
55947

CITY OF LAKE ELMO
11194 UPPER 33RD ST
LAKE ELMO MN
55042

CITY OF LAKE INDEPENDENCE
RT 1 BOX 123A
MAPLE PLAIN MN
55359

CITY OF LAKEVILLE
8830 207TH ST W
LAKEVILLE MN
55044

ITY OF LITCHFIELD
26 NO MARSHALL
ITCHFIELD MN
55355

CITY OF LITTLE CANADA
515 LITTLE CANADA RD
LITTLE CANADA MN
55117

CITY OF LITTLE FALLS
100 7TH AVE NE
LITTLE FALLS MN
56345

CITY OF MAPLE GROVE
9401 FERNBROOK LANE
MAPLE GROVE MN

ITY OF MAPLEWOOD
380 FROST AVE
APLEWOOD MN
55109

CITY OF MENDOTA HEIGHTS
BANK BLDG 750 S PLAZADR
ST PAUL MN
55120

CITY OF MINNEAPOLIS
300 PUBLIC SERVICE CTR
MPLS MN
55411

CITY OF MINNEPOLIS
3801 66TH AVE NO
BROOKLYN CTR MN
55429

ITY OF MINNETONKA
4600 MINNETONKA BLVD
INNETONKA MN
55343

CITY OF MOORHEAD
BOX 779 CITY HALL
MOORHEAD MN
56560

CITY OF MORRIS
CITY HALL
MORRIS MN
56267

CITY OF MOUNDSVIEW
2401 HWY 10
ST PAUL MN
55112

ITY OF MOUNTAIN LAKE
ITY HALL
OUNTAIN LK MN
56159

CITY OF NEW BRIGHTON
803 5TH AVE NW
NEW BRIGHTON MN
55112

CITY OF NEW HOPE
4401 XYLON AVE NO
NEW HOPE MN
55428

CITY OF NORTHFIELD
304 SO DIVISION
NORTHFIELD MN
55057

ITY OF OAKDALE
584 HADLEY AVE SO
AKDALE MN
55119

CITY OF ORONO
PO BOX 66
CRYSTAL BAY MN
55323

CITY OF PLYMOUTH
3025 HARBOR LANE
PLYMOUTH MN
55441

CITY OF PROCTOR
200 2ND ST CITY HALL
PROCTOR MN
55810

ITY OF RAMSEY
4100 ST FRANCIS DR

CITY OF REDLAKE FALLS
BOX 448

CITY OF RICHFIELD
6700 PORTLAND AVE

CITY OF ROBBINSDALE
4221 LAKE RD

CITY OF ANOKA
CITY HALL 2015 1ST AVE
ANOKA MN
55303

CITY OF APPLE VALLEY
14200 CEDAR AVE SO
APPLE VALLEY MN
55124

CITY OF BLAINE
9150 CENTRAL AVE NE
BLAINE MN
55434

CITY OF BLOOMINGTON
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

CITY OF BRAINERD
CITY HALL
BRAINERD MN
56401

CITY OF BRECKENRIDGE
CITY HALL
BRECKENRIDGE MN
56520

CITY OF BROCKLYN CENTER
6301 SHINGLE CREEK PKWY
BROOKLYN CTR MN
55429

CITY OF BROCKLYN PARK
5800 85TH AVE NO
BROOKLYN PARK MN
55443

CITY OF BUFFALO
212 CENTRAL AVE
BUFFALO MN
55313

CITY OF BURNSVILLE
1313 E HWY 13
BURNSVILLE MN
55337

CITY OF CAMBRIDGE
139 E FIRST AVE
CAMBRIDGE MN
55008

CITY OF CARVER COUNTY
600 E FOURTH ST
CHASKA MN
55315

CITY OF CHAMPLIN
12001 HWY 52
CHAMPLIN MN
55316

CITY OF CHANHASSEN
7610 LAREDO
CHANHASSEN MN
55317

CITY OF CHASKA
205 E 4TH ST
CHASKA MN
55318

CITY OF CIRCLE PINES
9201 LEXINGTON AVE NO
CIRCLE PINES MN
55014

CITY OF CLEAR LAKE
ROUTE 1
CLEAR LAKE MN
55319

CITY OF COLUMBIA HEIGHTS
590 40TH AVE NE
COLUMBIA HGHT MN
55421

CITY OF COON RAPIDS
1313 COON RAPIDS BLVD
COON RAPIDS MN
55433

CITY OF COTTAGE GROVE
7516 80TH ST SO
COTTAGE GROVE MN
55016

CITY OF CROOKSTON
PO BOX 374
CROOKSTON MN
56716

CITY OF CRYSTAL
4141 DOUGLAS DRIVE NO
CRYSTAL MN
55428

CITY OF DEEPHAVEN
20225 COTTAGEWOOD RD
DEEPHAVEN MN
55391

CITY OF DETROIT LAKES
106 E HOLMES ST
DETROIT LAKES MN
56501

CITY OF DODGE CENTER
CITY HALL
DODGE CENTER MN
55927

CITY OF DULUTH
CITY HALL
DULUTH MN
55802

CITY OF EAGAN
3795 PILOT KNOB ROAD
EAGAN MN
55122

CITY OF EAST BETHEL
2751 VIKING BLVD NE
WYOMING MN
55092

CITY OF E GRAND FORKS
P O BOX 453
E GRAND FORKS MN
46721

CITY OF EDEN PRAIRIE
8950 EDEN PRAIRIE RD
EDEN PRAIRIE MN
55343

CITY OF EDINA
4801 W 50TH ST
EDINA MN
55424

CITY OF FAIRMONT
114 E 1ST ST
FAIRMONT MN
56031

CITY OF FRIDLEY
6431 UNIVERSITY AVE NE

CITY OF GOLDEN VALLEY
7800 GOLDEN VALLEY RD

CITY OF HAM LAKE
15544 CENTRAL AVE NE

CITY OF HASTINGS
100 SIBLEY ST

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 SCH
IND DIST #561
GOODRIDGE MN
56725

BROWN H D
4961 KINGSBERRY LANE
MINNETONKA MN
55343

BRUBACHER RICHARD COMM ADM
208 ADM BLDG
ST PAUL MN
55101

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

BUSCH NOEL
SUITE 705 510 MARQUETTE
MPLS MN
55402

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

CABLE COMM SYST-H SARRAZIN
BOX 777
HECTOR MN
55342

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

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

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1325 W 251/2 ST APT 206
MPLS MN
55405

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5005 MTKA BLVD
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55416

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1231 25TH ST NW
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CHILDS J L
4012 LYNN AVE S
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1821 UNIV AVE SUITE 271
ST PAUL MN
55104

CHRISTIANSEN FREDRIK
RM 505 CAPITOL SQ BLDG
ST PAUL MN
55155

CHRYSALIS CENTER FOR WOMEN
2104 STEVENS AVE S
MPLS MN
55404

CITY CLERK
386 CITY HALL
ST PAUL MN
55102

CITIZENS LEAGUE
530 SYNDICATE BLDG
MPLS MN
55402

CITY OF ABERDEEN
CITY HALL
ABERDEEN SD
57401

CITY OF ALBERT LEA
221 E CLARK ST
ALBERT LEA MN
56007

CITY OF ALEXANDRIA
114 7TH AVE W BOX 231
ALEXANDRIA MN
56308

CITY OF ANDOVER
1685 CROSSTOWN BLVD NW
ANOKA MN
55303

CITY OF ANOKA
CITY HALL 2015 1ST AVE

CITY OF APPLE VALLEY
14200 CEDAR AVE SO

CITY OF BLAINE
9150 CENTRAL AVE NE

CITY OF BLOOMINGTON
2215 W OLD SHAKOPEE RD

ANTHONY DICK WDSM RADIO
230 E SUPR ST
DULUTH MN
55102

ARNOLD ROBERT MESPA
41 SHERBURNE
ST PAUL MN
55103

ARROWHEAD ECONOMIC OP AGENCY
CO S BRUSTUN BOX 1066
VIRGINIA MN
55792

ARROWHEAD REG. DEV COMM.
211 W 2ND ST
DULUTH MN
55802

ARROWHEAD REGIONAL DEV COMM
200 ARROWHEAD PLACE
DULUTH MN
55802

ASH GEORGE
3040 OTTAWA STREET
ST LOUIS PARK MN
55416

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

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

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

ASSN RESIDENCES FOR RETARDED
459 RICE SUITE 301
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

BARATTO DIVINE M
1192 BUSH ST
ST PAUL MN
55106

BARRETT FRED
ST LOUIS CO COURT HOUSE
DULUTH MN

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

BECK PAT
953 HYACINTH AVE
ST PAUL MN
55106

BEGALKA D REV
212 N ELK ST
BELLE PLAINE MN
56011

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

BENDA GEORGE
RURAL ROUTE 1
ALPHS MN
56111

BERGERUD ALF
300 ROANOKE BLDG
MPLS MN
55402

BERGSETH THOMAS
1011 NICOLLET MALL
MPLS MN
55403

BEST FLANAGAN ET AL
4040 IDS CENTER
MPLS MN
55402

BEUTEL ROBERT
2200 SILVER LAKE RD
NEW BRIGHTON MN
55112

BINGHAM KE CRIM JUSTICE COUN
351CITY HALL ANNEX
ST PAUL MN
55102

BLADIN PAPER CO W J LICKE
115 1ST ST SW
GRAND RAPIDS MN
55744

BLOMQUIST BARRY L

NORTH BRANCH MN
55056

BLOOMINGTON CITY CLERK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

BOWMAN & BRUNS ATTN P MASON
1616 PIONEER BLDG
ST PAUL MN
55101

BREHL JAMES W
332 HAMM BLDG
ST PAUL MN
55102

BRICK PHILIP D
807 SELLWOOD BLDG
DULUTH MN
55802

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

BROEKER JOHN
2850METRO DR SUITE 504

BROOKS WILLIAM F JR
854 MIDLAND BK BLDG

BROWN D M GOODRIDGE PUB SCH
IND DIST #561

BROWN H D
4961 KINGSBERRY LANE

TEST PATTERN TEST PATTERN
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CITY TESTCITY MN
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AHOLA DEBRA
616 LINCOLN AVE APT 307
ST PAUL MN
55102

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

ALLIN M KARLS
2333 UNIV AVE SE
MPLS MN
55414

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

ALLERS JOHN
1501 W 80TH ST SUITE210
BLOOMINGTON MN
55431

AMER CAMPING ASSN
3639-21/2 ST N.E.
MPLS MN
55418

AM INST PROF GEOLOGISTS
2201 PRINCETON AVE
ST PAUL MN
55105

ANCHOR BLOCK COMPANY
PO BOX 3360
ST PAUL MN
55165

ANDERSON DEBRA
1115 E RIVER ROAD
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 MARY
4425 RUTLEDGE AVE
EDINA MN
55436

ANDERSON STANFORD P
14600 MINNETONKA BLVD
MINNETONKA MN
55343

ANTHONY DICK WDSM RADIO
230 E SUPR ST

ARNOLD ROBERT MESPA
41 SHERBURNE

ARROWHEAD ECONOMIC OP AGENCY
CO S BRUSTUN BOX 1066

ARROWHEAD REG. DEV COMM.
211 W 2ND ST

RMA

RUBBER MANUFACTURERS ASSOCIATION

1901 PENNSYLVANIA AVE., N. W. • WASHINGTON, D. C. 20006 • (202) 785-2602

RECEIVED

NOV 13 1978

OFFICE OF HEARING EXAMINERS

November 9, 1978

Mr. George Beck
Office of Hearing Examiners
1745 University Avenue
St. Paul, Minnesota 55155

REF: Chapter 19 Standards for Safe Operating Condition of Passenger Automobile Tires - Section 11 MCAR § 1.0168 Unsafe Tires

Dear Mr. Beck:

The Rubber Manufacturers Association wishes to seek clarification of the proposed language contained in the above-referenced addition to the Minnesota code. We understand hearings have been scheduled for November 30, 1978, and ask that our comments be brought to the attention of said hearing.

11 MCAR § 1.0168 Unsafe Tires, Subsection B reads as follows:

> B. ...there is any bump, bulge or separation of the sidewall ply or tread.

Minor bumps, bulges or knots on a tire are often cosmetic in nature and neither affect the structural integrity of nor the safe operational expectations from the tire. These cosmetic imperfections are most often the result of a slight fabric overlap or a thickening of the rubber in one or more locations.

The RMA brings this matter to your attention because the proposed wording of the new regulation could well be interpreted in such a way that some tires could be prematurely retired from service. We fully agree with the intent of the proposed regulation. Dangerously worn or damaged tires should be removed from the roadway. However, consumers should also be allowed to receive anticipated service from a tire in the absence of any structural defect.

If a bump or bulge is evidence of a ply separation, the tire should be retired from service immediately. Generally, bumps or bulges caused by ply separations are larger and more bulbous than a cosmetic imperfection. RMA experience has shown that law enforcement personnel rarely have difficulty identifying the bump or bulge caused by ply separation; they are fairly obvious.

However, if the proposed wording of the regulation is adopted as presently constituted - any bump ... - would be cause for ruling a tire unsafe. The RMA would like to offer the following wording as a means of accomplishing the intended purpose without penalizing the user of a structurally sound tire which may have a cosmetic blemish:

B. There is any bump or bulge cause by a separation of the sidewall, tread or ply.

Thanking you for your consideration, I remain

Very truly yours,

Leo M. Cyr, Director
State Government Relations

LMC:pp

cc: Tom Cole
Frank Timmons

RUBBER MANUFACTURERS ASSOCIATION
1901 PENNSYLVANIA AVE., N.W. • WASHINGTON, D.C. 20006 • (202) 785-2602

Statement of
Thomas E. Cole
Vice President - Tire Division
Before the Minnesota Department of Public Safety
November 30, 1978

The RMA, on behalf of the domestic manufacturers of tires, is pleased to have this opportunity to present our views on the Proposed Rules Regarding Standards for Safe Operating Condition of Passenger Automobile Tires.

At the outset, let me say that we wholeheartedly endorse the purpose and intent of these Proposed Rules and we applaud the State of Minnesota for taking these actions. For the most part, we have absolutely no quarrel with the Proposed Rules as drafted.

We do, however, have some concern with the wording of the second condition listed which would render a tire "unsafe" (11 MCAR §1.0168, Subsection B). As presently written, a tire could be deemed "unsafe" if: "There is any bump, bulge or separation of the sidewall, tread, or ply."

Minor bumps, bulges or knots on a tire are not uncommon, but are often cosmetic in nature and neither affect the structural integrity of, nor the safe operational expectations from the tire. These cosmetic imperfections are most often the result of a slight fabric overlap or a thickening of the rubber in one or more locations.

The RMA brings this matter to your attention because the proposed wording of the new regulation could well be interpreted in such a way that some tires could be prematurely retired from service. As stated before, we fully agree with the intent of the proposed regulation. Dangerously worn or damaged tires should be removed from the roadway. However, consumers should also be allowed to receive anticipated service from a tire in the absence of any structural defect.

One common form of such a cosmetic imperfection is what is known in the industry as "sidewall indentations" which, to the casual observer might be seen as bumps or bulges.

Field surveys indicate that sidewall indentations are a very common condition, regardless of size or brand. This condition can be found, to some degree, on every radial tire on the new car dealer's showroom floor. It is not unique to any body ply fabric, although polyester is most susceptible to this condition and most noticeable. Larger size tires have more obvious and frequent indentations than smaller tires.

A tire may have such indentations caused in the following fashion. Indentations, which can be as many as four in number on one side of the tire, correspond to the splice areas in the tire. They are generated during the curing (vulcanization) and post inflation (cooling) steps of the tire's manufacture. At the lapped splice area, the thermal shrinkage property of the cords create the indentation. The indentations can fall randomly around the tire and can vary in size from tire to tire in a given size. This condition is not a defect, and is in no way related to loss of tire ride or durability performance. These indentations are not open splices and should not be misconstrued as such. An open splice would be identified as a bulge in the sidewall of a radial tire.

Certainly, on the other hand, a tire which has a bump or bulge that is evidence of a ply separation should be removed from service immediately.

The question then to be answered must be how can an enforcement officer differentiate between a cosmetic imperfection and a potentially dangerous ply separation. Generally speaking, a bump or bulge caused by a ply separation will be relatively larger and more bulbous than a cosmetic flaw. A cosmetic imperfection is usually small. It has been our experience that law enforcement personnel rarely have difficulty in identifying the potentially dangerous ply separation condition.

It is with these thoughts in mind, then that we suggest 11 MCAR §1.0168(B) be amended to read as follows:

> "There is a separation which may be indicated by a bump or bulge of the sidewall tread or ply."

TECHNICAL INFORMATION BULLETIN

February, 1977

Public Exhibit No. E
File No. DPS-79-001-GD
SAAB Date 11/3/78

RADIAL-PLY TIRE sidewall indentations





Complaints have been reported regarding indentations in the sidewall and buttress area of radial ply passenger tires, as shown above. The purpose of this Technical Information Bulletin is to explain its cause and to provide information to help you instruct and inform your personnel.

HOW WIDESPREAD IS THE CONDITION?

Field surveys indicate that sidewall indentations are a very common condition, regardless of size or brand. This condition can be found, to some degree, on every radial tire on the new car dealer's showroom floor. It is not unique to any body ply fabric, although polyester is most susceptible to this condition and most noticeable. Larger size tires have more obvious and frequent indentations than smaller tires. This bulletin is addressing itself to polyester body ply radial tires [redacted]

WHAT CAUSES SIDEWALL INDENTATIONS IN POLYESTER TIRES?

A polyester tire has such indentations caused in the following fashion. Indentations, which can be as many as four in number on one side of the tire, correspond to the splice areas in the tire. They are generated during the curing (vulcanization) and post inflation (cooling) steps of the tire's manufacture. At the lapped splice area, the thermal shrinkage property of the polyester cords create the indentation. The indentations can fall randomly around the tire and can vary in size from tire to tire in a given size. These indentations are not open splices and should not be misconstrued as such. An open splice would be identified as a bulge in the sidewall of a radial tire.

ARE SIDEWALL INDENTATIONS AN ADJUSTABLE CONDITION?

This condition is not a defect. It occurs in all polyester radial tires and is in no way related to loss of tire ride or durability performance of your [redacted] radials. Consequently, it will not meet the definition of unserviceability within the meaning and intent of our product warranty.

Millions of test and customer miles have substantiated durability and ride performance. As circumstances may require, dealers and store personnel should be instructed to inform the customer of these facts and tires containing the described and shown condition should be continued in service.

TECHNICAL INFORMATION BULLETIN

August, 1978

Public Exhibit No. D
File No. 1-79-CV-613
Date 11/3/78

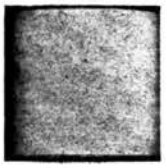
RADIAL-PLY TIRE sidewall indentations





Complaints have been reported regarding indentations in the sidewall and buttress area of radial ply passenger tires, as shown above. The purpose of this Technical Information Bulletin is to explain its cause and to provide information to help you instruct and inform your personnel.

HOW WIDESPREAD IS THE CONDITION?



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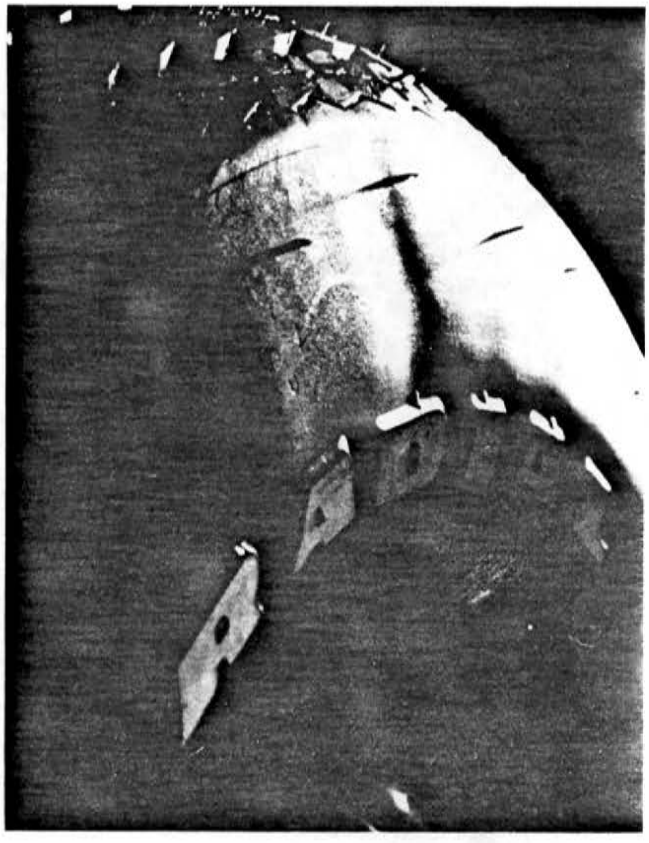
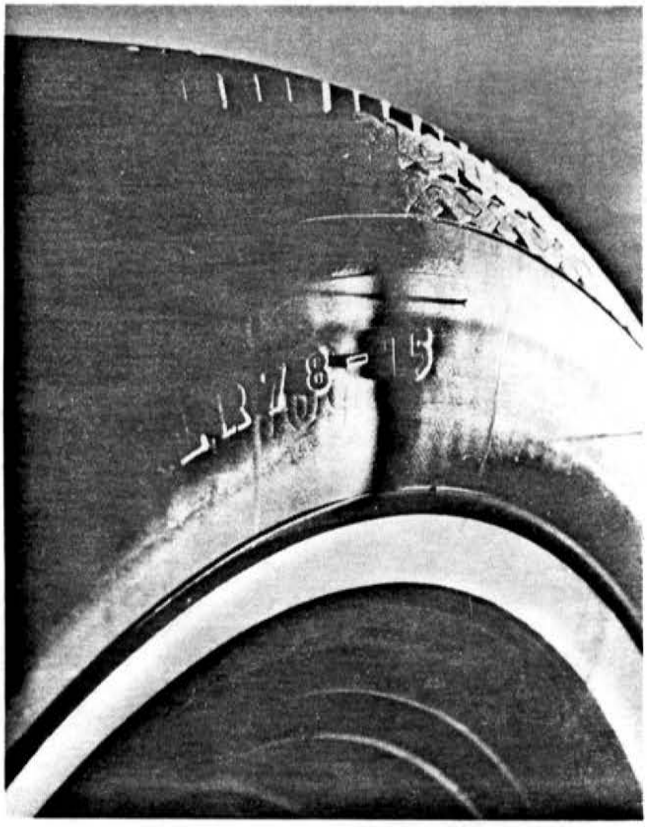
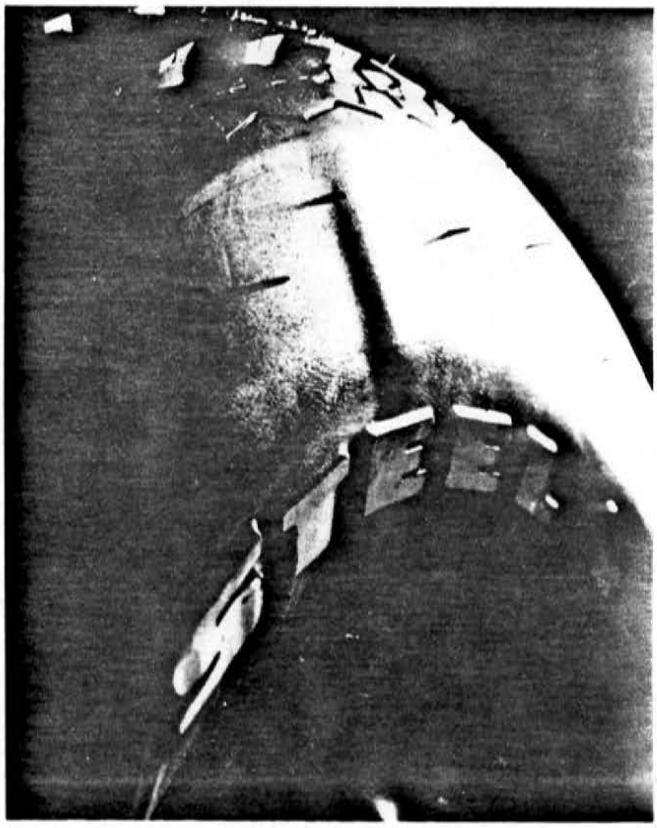
RADIAL · sidewall indentations









RADIAL · sidewall indentations

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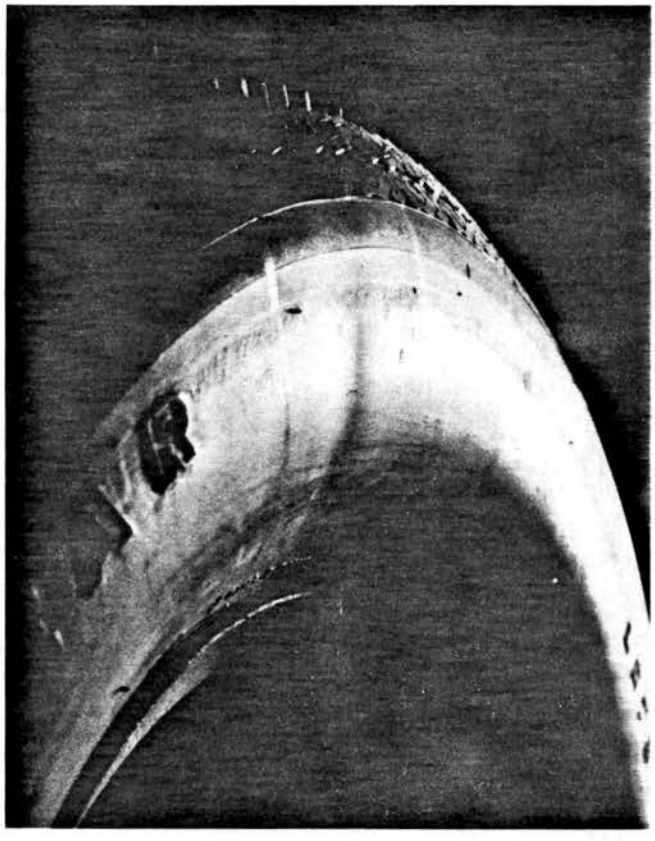

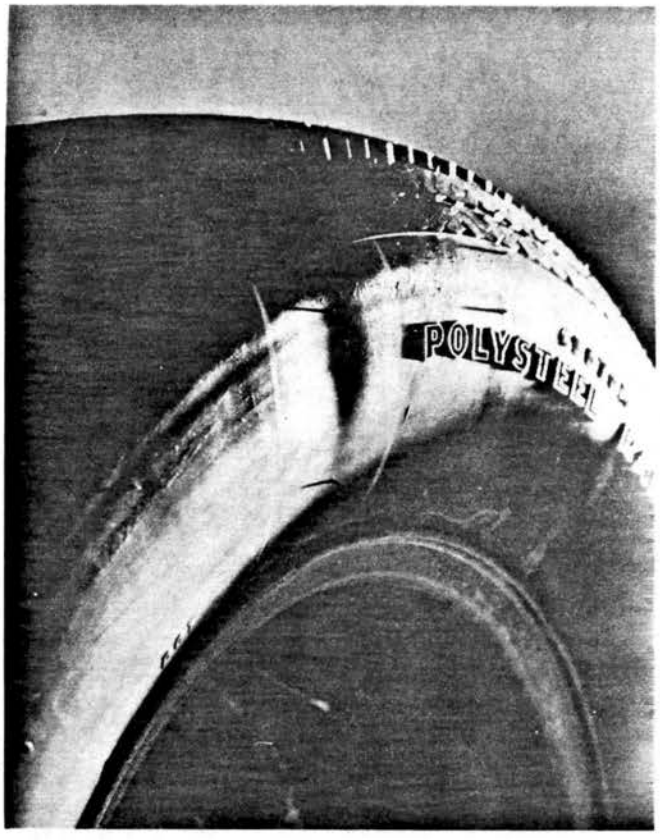

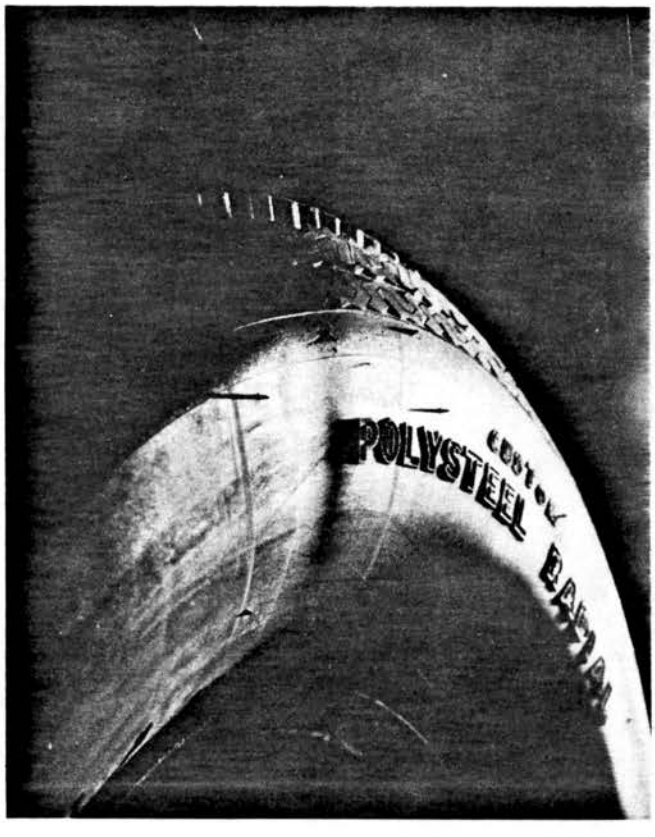

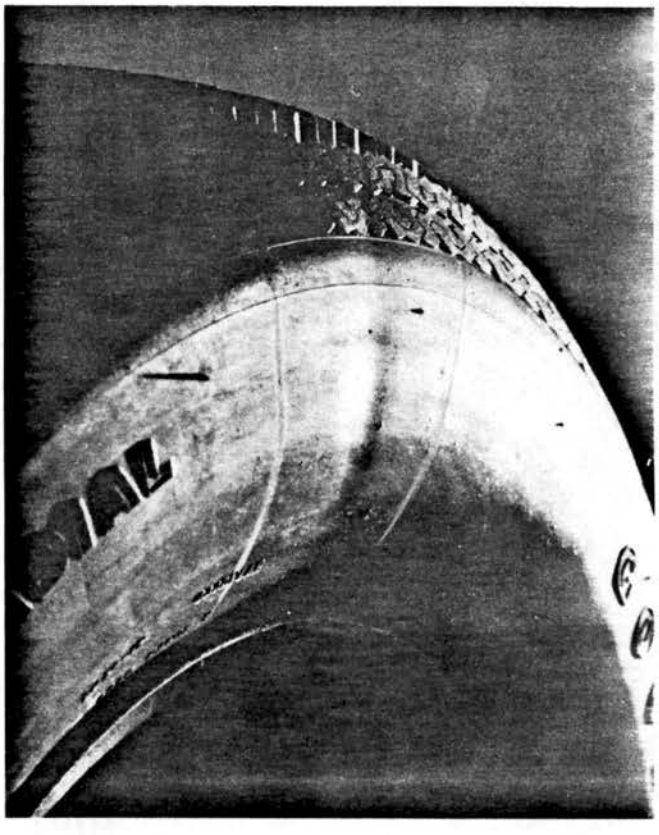

In Reply Address To:
Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

Warren Spannaus
Attorney General
State of Minnesota
St. Paul

November 30, 1978

Mr. George Beck
Hearing Examiner
Suite 300
1745 University Avenue
St. Paul, Mn 55104

Re: Adoption of Rules of the Commissioner
of Public Safety Relating to Passenger
Vehicle Tire Safety Standards.

Dear Mr. Beck:

This letter is being sent on behalf of the Department of Public Safety to clarify two matters which may remain as loose ends following the hearing on the proposed rules in the above captioned matter.

As the record indicates, the standards set forth in the rules are almost identical to the language of Minn. Stat. § 169.723 (1976). It is the Department's position that this duplication of statutory language is not only crucial to the ability of a person affected by the proposed rule to comprehend its meaning; but also is required by the specific language of Minn. Stat. § 169.722 (1976).

As to the first point, you may recall Major Lueck's testimony that in his judgment phrasing the standards in those terms would give members of the public, as well as law enforcement officers, a specific statement as to what defects in a tire make it unlawful for use. You may also recall that all the defects described may be ascertained from a visual inspection of the tire itself.

As to the second point, Minn. Stat. § 169.772 (1976) provides (in relevant part) that: "(T)he rules (adopted) . . . shall incorporate all of the provisions of section 169.723." This is a rather unusual statutory provision, and in my judgment this standing alone probably provides a legal basis for this duplication of statutory language in the proposed rule.

One additional matter should be made clear. The Department has no objection to the amendment offered by the representative of the Rubber

Manufacturers Association, Mr. Cole.

Yours very truly,

FREDERICK S. SUHLER, JR.
Special Assistant Attorney General

FSS:jmr

cc: Diane Hamilton