

COMMISSION BRIEFING SLIDES/EXHIBITS

**BRIEFING ON NMSS PROGRAMS, PERFORMANCE
AND FUTURE PLANS AND INTEGRATED STRATEGY
ON SPENT FUEL MANAGEMENT**

JUNE 25, 2010



**NMSS Programs, Performance,
and Future Plans and Integrated
Strategy on Spent Fuel
Management**

Catherine Haney, Director

June 25, 2010

AGENDA

- **Program Overview**
- **Managing a Dynamic Program**
- **Licensing and Oversight of Fuel Cycle Facilities**
- **Enhancing Safeguards and Non-Proliferation**
- **Integrated Plan on Spent Fuel Management**
- **Conclusion**

Program Overview

- **Major Programs**

- **Maintaining safety & security of operating facilities**
- **Licensing and oversight of new fuel facilities**
- **Licensing and oversight of spent fuel storage and RAM transportation**
- **Managing the high level waste program**

Program Overview

- **Near-Term Policy Issues/Commission Interactions**
 - **Revising the fuel cycle oversight process**
 - **Revisiting the Paradigm of Spent Fuel Storage and Transportation**
 - **Integrated Plan for Spent Fuel Management framework**

Program Overview

- **Challenges**

- **Stabilize the regulatory program for high level waste disposal**
- **Launch the Integrated Plan for spent fuel management**
- **Integrate concurrent regulatory activities**

Managing a Dynamic Program

**Timothy Pulliam, Director
Division of Planning Budget and
Program Analysis**

Managing a Dynamic Program

- **Knowledge Management**
- **Outreach activities**
 - **Enhancing outreach to domestic and international stakeholders**
- **Work-Life balance**

Licensing of Fuel Cycle Facilities and Enhancing Safeguards and Non-Proliferation

**Marissa Bailey, Deputy Director
Division of Fuel Cycle Safety and
Safeguards**

Licensing of Fuel Cycle Facilities

- **Successes**

- **All metrics met or exceeded with heavy caseload**
- **License renewal**
- **LES pre-operations caseload**
- **New applications**
- **MOX Fuel Fabrication Facility**

Licensing of Fuel Cycle Facilities

- **Challenges/Potential Policy Issues**
 - **Develop new processes for R&D, medical isotope production**
 - **Address ISA Implementation Challenges**

Licensing of Fuel Cycle Facilities

- **Continuous improvement**
 - **Lean Six Sigma**
 - **Staff Qualification Standards**
 - **Updated guidance to reviewers**

Enhancing Safeguards and Non-Proliferation

- **Agency Roles**
- **Recent Activities**
- **Challenges**

Integrated Plan on Spent Fuel Management

**Lawrence Kokajko, Director
Division of High Level Waste
Repository Safety**

Integrated Plan on Spent Fuel Management

- **The objective is to enhance efficiency and effectiveness for regulation of the back-end of the fuel cycle (safety, security, and environmental protection)**

Integrated Plan on Spent Fuel Management

- **Overview of the strategy**
 - **Regulatory and analytical tools for high level waste disposal**
 - **Regulatory framework for reprocessing**
 - **Extended storage and transportation of spent fuel**

Regulatory and Analytical Tools for Waste Disposal

- **Challenges/Potential Policy issues**
 - **Adjusting our regulatory programs to prepare for the future**
 - **Ensuring the versatility of our technical tools and regulatory program to encompass an array of different high level waste disposal alternatives**

Regulatory and Analytical Tools for Waste Disposal

- **Path forward**
 - **Development of regulatory gap analysis for waste disposal**
 - **Development of flexible performance assessment tool**

Regulatory Framework for Reprocessing

- **Challenges/Potential Policy Issues**
 - **Coordinate framework schedule**
 - **Resolve complex technical and policy issues**

Regulatory Framework for Reprocessing

- **Path forward**
 - **Develop regulatory basis to support rulemaking**
 - **Initiate environmental work**

**Revisiting the Paradigm of
Spent Nuclear Fuel
- Extended Storage and Transportation -**

**Vonna Ordaz, Director
Division of Spent Fuel Storage
and Transportation**

Revisiting the Paradigm

- **Commission Direction**
 - **Review Spent Fuel Storage and Transportation Programs for periods beyond 120 years**
 - **Conduct research to bolster the regulatory framework**

Scope of Program Review

- **Regulatory Process Improvements**
 - **Licensing**
 - **Inspection and Enforcement**
- **Extended Storage and Transportation**
 - **Safety**
 - **Security**
 - **Environment**

Materials Aging Research

- **Aging gap analysis underway**
- **Research on high burnup fuel (ongoing), sealed canisters and other components**
- **Participate in EPRI-led Long-term Cask Demonstration Program**

Extended Storage and Transportation

- **Challenges/Potential Policy issues**
 - **Rulemaking for cask certification**
 - **Storage and transportation integration**
 - **Long-Term cladding integrity**
 - **Financial Qualifications/Assurance**

Extended Storage and Transportation

- **Path Forward**
 - **Near-Term process improvement activities**
 - **EST gap assessments**
 - **Research and Extended Storage Collaboration Program**

Conclusion

Acronyms

- **EPRI – Electric Power Research Institute**
- **EST – Extended Storage and Transportation**
- **ISA – Integrated Safety Analysis**
- **LES – Louisiana Energy Services**
- **MOX – Mixed Oxide**
- **NMSS – Nuclear Material Safety and Safeguards**
- **RAM – Radioactive Material**
- **R&D – Research and Development**

Integrated Spent Fuel Management

June 25, 2010

**Steven P. Kraft
Senior Director, Used Fuel
Management
Nuclear Energy Institute**

Integrated Strategy

- **Interim Storage**
 - **2010 – 1200 (14,000 MTU) casks loaded**
 - **2020 – 2600 (26,000 MTU) casks loaded**
 - **Increased efficiency necessary**
 - **Risk inform licensing and inspection**
 - **Develop safety-analysis based criteria for Technical Specifications**
 - **Centralized interim storage**

Integrated Strategy

- **Recycling**
 - **Technology neutral regulations necessary**
- **Disposal**
 - **Current review process is efficient**

Summary Statement of Marvin S. Fertel
Blue Ribbon Commission on America's Nuclear Future
May 25, 2010

The Nuclear Energy Institute's utility members and the Nation's electricity ratepayers have committed over \$34 billion* since 1982 to the Nuclear Waste Fund for the federal program that was supposed to have begun removing used fuel from commercial nuclear power plant sites over 12 years ago.

Within the federal government, inconsistency in the approach to managing used nuclear fuel and a lack of policy and management accountability have impeded the ability to build political consensus on this issue and pursue needed used fuel management projects. The following principles will help ensure that a stable used nuclear fuel management policy is created:

- The Nation must have a durable policy to manage used nuclear fuel responsibly.
- The Nation must have a plan for the ultimate disposal.
- An ideal technical solution is not required to begin implementation of a new policy direction. Evolutionary (and even revolutionary) advances in technology improvements can be incorporated over time without deferring decisions until decades of research are completed.
- Non-proliferation goals must be met.
- The successes and failures of the past (particularly in facility siting) must be heeded.

The following recommendations are offered to assist the Commission to judge the various policies, technologies, and systems that are available now or might be in the future.

1. An integrated used fuel management system will include both near- and long-term programs that must be operated over decades cannot be successful if policies regarding used fuel and high-level waste are continually subject to change.
2. The costs of a long-term management program must not be an undue burden.
3. Geologic disposal will be necessary in any used fuel management scenario and the nation's policy must establish a clear and achievable path to disposal; the licensing review of Yucca Mountain should be completed, even if the project will not be used.
4. Future disposal efforts should build broad based public support with a step-wise approach.
5. Centralized interim storage should be a strategic element of used fuel management.
6. The commercial used nuclear fuel program should be transferred to an entity with a management and financing structure that is able to function in the presence of the inevitable political and policy changes that will occur over the coming decades
7. Both current and advanced recycling and related nuclear fuel cycle technologies will not provide the sole solution for used fuel management, but can be a strategic element of used fuel management. Consistent, sustained political and policy support is a must and any system must provide value to justify the investment. Meeting non-proliferation goals is a must.
8. Research, development and demonstration of advanced technologies should be pursued, but real, practical approaches that the private sector would be willing to develop, finance, and that can be successful in the market place are needed.
9. Different technologies can be developed to handle fuels from different types of reactors to gain greater benefits.

In closing, the greatest service that the Commission can render to the Nation is to develop a used fuel management policy that will endure, define a process for implementing the policy, determine the timelines to be followed to achieve the policy, and delineate the legal and legislative changes needed to make the policy a reality.

* Including interest earned in the Fund and one-time fees owed.

Statement before

Blue Ribbon Commission on America's Nuclear Future

**Marvin S. Fertel
President and Chief Executive Officer
Nuclear Energy Institute**

May 25, 2010

Chairmen Hamilton and Scowcroft and distinguished members of the Commission, my name is Marvin S. Fertel and I am President and Chief Executive Officer of the Nuclear Energy Institute (NEI). Thank you for the invitation to speak with you today about the vital question of the future of our Nation's used nuclear fuel management policies and programs. We appreciate the opportunity to open an on-going dialogue with the Commission as it carries out its mandate.

NEI is the national policy organization of the nuclear industry.¹ NEI's utility members and the Nation's electricity ratepayers have committed over \$34 billion² since 1982 to the Nuclear Waste Fund for the federal program that was supposed to have begun removing used fuel from commercial nuclear power plant sites over 12 year ago.

We look forward to the work of this Commission to recommend policies and programs that will manage commercial used fuel as required by the Nuclear Waste Policy Act of 1982.

Over the past seventy years, applications of nuclear fission including defense, research, medicine, naval propulsion and power production have produced immeasurable benefits for our society. They have also resulted in a large and growing inventory of used nuclear fuel and high-level radioactive waste. The commercial nuclear industry and the federal government have demonstrated that it can safely and securely store used nuclear fuel and high-level radioactive material. And, while we have about 63,000 MTU commercial used fuel in safe and secure storage, these practices are not meant to be permanent. By now, DOE should have already moved 25,250 MTU used fuel from our sites and be continuing to move an additional 3,000 MTU per year.

Nuclear power is now poised for growth to meet America's energy needs and environmental goals. Within the federal government, inconsistency in the approach to managing used nuclear fuel and a lack of policy and management accountability have impeded the ability to build political consensus on this issue and pursue needed used fuel management projects.

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

² Including interest earned in the Fund and one-time fees owed.

It is the view of the nuclear industry that adherence to the following principles will help ensure that a stable used nuclear fuel management policy is created:

- The Nation must have a durable policy to manage used nuclear fuel responsibly.
- The Nation must have a plan for the ultimate disposal of the byproducts from nuclear power generation.
- An ideal technical solution is not required to begin implementation of a new policy direction. Evolutionary (and even revolutionary) advances in technology improvements can be incorporated over time without deferring decisions until decades of research are completed.
- Regardless of the nuclear fuel cycle ultimately used, it must be designed and operated to ensure that non-proliferation goals are met.
- The successes and failures of the past must be understood to help guide the innovation of the future, especially the need to build public trust and confidence in the systems and facilities ultimately developed.

In addition, the nuclear energy industry offers the following recommendations to the Commission for use in judging the various policies, technologies, and systems that are available now or might be in the future.

1. U.S. policy for the management of high-level radioactive material should:
 - recognize that an integrated management system will include both near- and long-term programs, must be operated over decades and cannot be successful if policies regarding used fuel and high-level waste are continually subject to change.
 - be implemented in a manner such that the costs of a long-term management strategy are not an undue burden to commercial and private entities in the nuclear industry nor to our society, the beneficiaries of nuclear technology.
2. Geologic disposal will be necessary in any used fuel management scenario and the nation's policy must establish a clear and achievable path to disposal.
 - Geologic disposal is required for the multiple waste forms — including defense material — that already exist and may not be suitable for recycling or other advanced fuel cycle technologies.
 - Future disposal efforts should endeavor to build broad based public support (local, state, and national) and should consider a step-wise approach that would demonstrate the viability of final disposal and cultivate public confidence.
 - The licensing process for Yucca Mountain should be completed, even if the facility is not ultimately used, to demonstrate the regulatory process and provide lessons learned for future repository programs.
3. Centralized interim storage should be considered as a strategic element of used fuel management and would provide a safe, near-term solution for consolidating used fuel from shutdown commercial reactor sites and storing used nuclear fuel away from operating sites. The centralized interim storage facility should be licensed by the Nuclear Regulatory Commission, take advantage of past projects, as warranted, and be deployed in a region where it has broad based public and political support. In addition, centralized interim storage:
 - could be used by the federal government to meet its statutory and contractual obligation to accept and remove used nuclear fuel from reactor sites while reducing or eliminating the liability for taxpayers.
 - could be a complementary, near-term element of disposal, and recycling and other advanced fuel cycle technologies.

- could reduce public concerns regarding the accumulation of used nuclear fuel at operating and shutdown reactor sites and bolster public confidence by demonstrating the ability of the federal government to effectively manage commercial used fuel.
4. America's used nuclear fuel program should be transferred to an entity with a management and financing structure that is able to function in the presence of the inevitable political and policy changes that will occur over the coming decades. The industry recommends that such an entity should:
 - be empowered to act on behalf of the United States for entering into and administering contracts to provide used nuclear fuel management and related products and services.
 - have access to the Nuclear Waste Fund and be held accountable for using these monies for actions that directly support the ability of the government to meet its statutory and contractual obligations.
 5. Both current and advanced recycling and related nuclear fuel cycle technologies will not provide the sole solution for used fuel management, but can be a strategic element of used fuel management under the following conditions:
 - Consistent, sustained political and policy support is a must.
 - Providing significant value is required to justify the investment in any technology:
 - Enhance economical nuclear fuel supply and sustainability.
 - Reduce heat, volume and the radiotoxicity of the material to be placed in a disposal facility.
 - Research, development and demonstration of advanced technologies should be pursued to improve the benefits from recycling, but real, practical approaches that the private sector would be willing to develop, finance, and that can be successful in the market place are needed.
 - Different technologies can be developed to handle fuels from different types of reactors to gain greater benefits.
 - Systems are developed and operated in a manner that meets non-proliferation goals.
 - Recycling has been carried out safely on an industrial scale in European facilities for decades without any diversion of plutonium for unauthorized uses.
 - International nuclear fuel supply and used fuel take-back programs should be explored.
 6. The approach to management and disposal of commercial used fuel should be integrated, to the extent practical, with the management and disposal of used fuel and high-level waste currently stored at Department of Energy (DOE) sites in South Carolina, Idaho, Washington and elsewhere.

The policies and programs this Commission recommends must be carried out in a manner that will enhance public trust and confidence. The Commission can initiate that process in several ways. Of critical importance is what your report will say about the issues that seem to vex the public and political leaders when they contemplate nuclear waste management. Such issues include, but are not limited to, safety and security of transportation, safety and security of storage, and what recycle actually means in terms of the use of plutonium as an energy fuel. The industry believes that there are good answers to these questions and that necessary activities are currently carried out while protecting public health and security. In your report, we urge that you provide actionable recommendations for moving forward with used fuel management in a way that enhances public trust and confidence.

In closing, the greatest service that the Commission can render to the Nation is to develop a used fuel management policy that will endure, define a process for implementing the policy, determine the timelines to be followed to achieve the policy, and delineate the legal and legislative changes needed to make the policy a reality.

Let me say, again, how much we appreciate the opportunity to speak with you today opening an on-going dialogue with the Commission.

Attached is a set of NEI Fact Sheets and Policy Briefs providing information that the Commission might find useful in its deliberations.

I would be pleased to answer any questions you may have.

Industry Supports Integrated Used Fuel Management Strategy

April 2010

■ The nuclear energy industry supports a three-pronged, integrated used fuel management strategy:

- 1) Interim storage of used fuel at centralized, volunteer locations.
- 2) Research, development and demonstration of advanced fuel-utilization and recycling technologies.
- 3) Development of a permanent disposal facility.

■ Used fuel storage at nuclear plant sites is safe and secure. However, interim storage sites at centralized volunteer locations will enable the movement of used fuel from both decommissioned and operating plants before recycling facilities or a repository begin operating.

■ A research and development program should be implemented for advanced nuclear fuel utilization and recycling technologies, including a commercial demonstration plant. The objectives of reprocessing and recycling uranium fuel are to reclaim a significant amount of energy that remains in the fuel and to reduce the volume, heat and toxicity of byproducts placed in the repository.

Goals of an Integrated Strategy

An integrated used fuel management program includes key elements phased in during the short, medium and long terms.

Short-term goals include:

- Continuing the U.S. Nuclear Regulatory Commission's endorsement of waste confidence.

- Signing of standard contracts between the U.S. Department of Energy and energy companies for managing used fuel at new nuclear plants (which was accomplished in 2008).

- Adequately funding the repository licensing process, including the NRC's review of DOE's Yucca Mountain repository construction application. The Obama administration has announced its intent to terminate this project and withdraw DOE's license application with prejudice, signaling that it does not intend to resubmit the application. DOE has established the Blue Ribbon Commission on America's Nuclear Future to recommend strategies for used fuel management. The industry believes the Yucca Mountain licensing process should continue. Ultimately, a geologic repository will be needed somewhere. Even if a facility is not built at Yucca Mountain, completion of the licensing process will yield vital lessons that will inform the commission's deliberations and facilitate completion of a facility when a new site is selected. However, if the administration halts the licensing process, the industry believes it should be done in a manner that would facilitate resuming the process at a later date should that be warranted.

- Establishing a research and development program for advanced fuel utilization and recycling technologies, including government partnerships with industry.



NUCLEAR
ENERGY
INSTITUTE

SUITE 400
1776 I STREET, NW
WASHINGTON, DC
20006-3708
202.739.8000
www.nei.org

Industry Supports Integrated Used Fuel Management Strategy

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- Identifying and developing volunteer sites for interim storage and advanced fuel utilization and recycling development facilities.

Medium-term goals include:

- Moving used fuel to interim storage sites, ideally at advanced fuel utilization and recycling development sites.
- Continuing research, development and demonstration of advanced fuel utilization, recycling and fuel fabrication technologies to make them more cost effective and efficient.
- Licensing a repository.

Long-term goals include:

- Commercial advanced fuel utilization and/or recycling.
- Operating the repository.

*View this policy brief online at
<http://www.nei.org/keyissues/nuclearwastedisposal/policybriefs/integratedusedfuelmanagementstrategy/>.*



EPRI

**ELECTRIC POWER
RESEARCH INSTITUTE**

Extended Storage: Research Perspective

John Kessler

Manager, Used Fuel and High-Level
Waste Management Program

jkessler@epri.com; 704-595-2737

NRC Commissioners Meeting

25 June 2010

Extended Storage Guiding Principles

- Reprocessing or disposal options may not be available for many decades
- Combination of wet and dry storage up to 120 years under existing regulatory precedent
 - 60 years wet storage; 60 years dry storage
 - By 2055: more used fuel in dry rather than wet storage
- Global interest: Not just a U.S. issue
- Existing and future storage systems are expected to perform their intended function beyond the current licensing period

Extended Storage Aging Management R&D Needs

- Near-term: Maximize life of existing systems and ensure transportability
 - Additional data and analyses of long-term degradation mechanisms
 - Enhanced monitoring and inspection
- Intermediate-term: Evaluate mitigation/design options
 - E.g., anti-corrosion coatings; new cask designs
- Long-term: Develop risk-informed approach to extended storage

“Extended Storage Collaboration Program” Initiated November 2009

- “Provide the technical bases to ensure safe, long-term used fuel storage and future transportability”
- Modeled on prior ISFSI license extension research
- Participants: EPRI, NRC, DOE, NEI, utilities, vendors, international
- Phased approach
 - Phase 1: Review current technical bases and conduct gap analysis for storage systems
 - Phase 2: Conduct experiments, field studies, and additional analyses to address gaps
 - Phase 3: Coordinate research that results in a demonstration of a representative licensed dry storage system loaded with high burnup fuel (>45 GWd/MTHM)



Together...Shaping the Future of Electricity



**U.S. DEPARTMENT OF
ENERGY**

Nuclear Energy

Fuel Cycle Research and Development Program

**Dr. Patrick R. Schwab, Director
Office of Used Nuclear Fuel Disposition
Research and Development**

**Nuclear Regulatory Commission
Rockville, MD
June 25, 2010**



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Nuclear Energy

Nuclear Energy Objectives

- 1. Improve the reliability, sustain the safety, and extend the lives of the current reactors**
- 2. Develop improvements in the affordability of new reactors**
- 3. Develop sustainable nuclear fuel cycles**
- 4. Understand and minimize the risks of nuclear proliferation and terrorism**



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FY 2011 Budget Request

Nuclear Energy

Nuclear Fuel Cycle R&D Appropriations

FY 2010 Appropriation: \$136,000,000

FY 2011 Request: \$201,000,000

This represents an increase of 48%.



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FCR&D Technical Areas

- **Separations and Waste Forms**
- **Advanced Fuels**
- **Systems Analysis and Integration**
- **Modeling and Simulation**
- **Materials Protection, Accounting, and Control for Transmutation**
- **Used Nuclear Fuel Disposition**



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FCR&D Technical Areas

- Separations and Waste Forms
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- Used Nuclear Fuel Disposition



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UFD FY 2011 Budget Details

Activity	Estimated Cost (\$ million)
Science Programs transferred from RW to NE	12
University research related to Used Fuel Disposition	9
RW Science Program closeout costs	8
Disposal evaluations and experiments	8
Storage and transportation evaluations and experiments	6
External interactions and collaborations	1
Used Fuel Disposition Campaign Management	1
Total	45



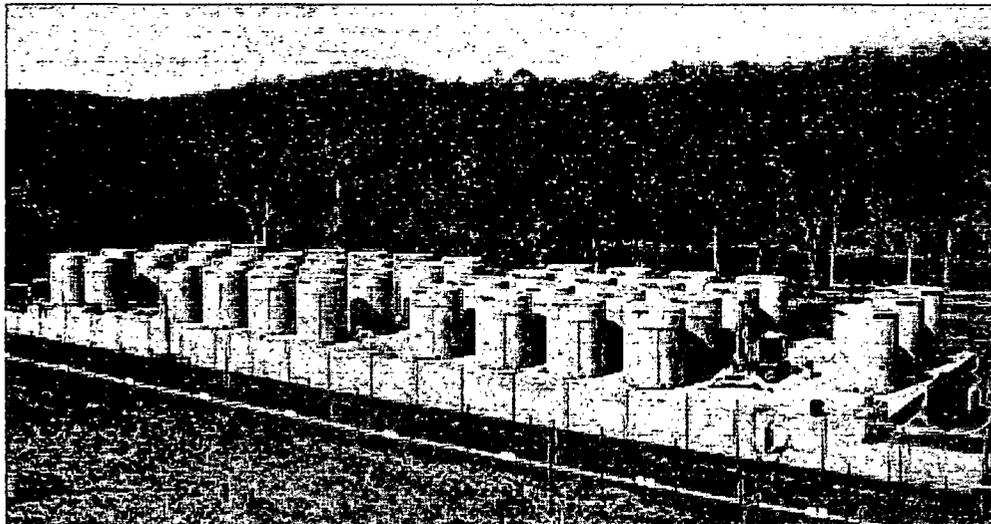
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Used Fuel Disposition: Storage

Extend the technical basis to allow:

- **storage of LWR fuel to 100 years or more**
- **storage of high burnup LWR fuels**
- **different fuel types and waste forms**



Connecticut Yankee ISFSI



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Used Fuel Disposition: Storage

- Evaluate concepts for distributed, regional, and centralized storage.
- No site-specific investigations.



Sellafield HLW Storage

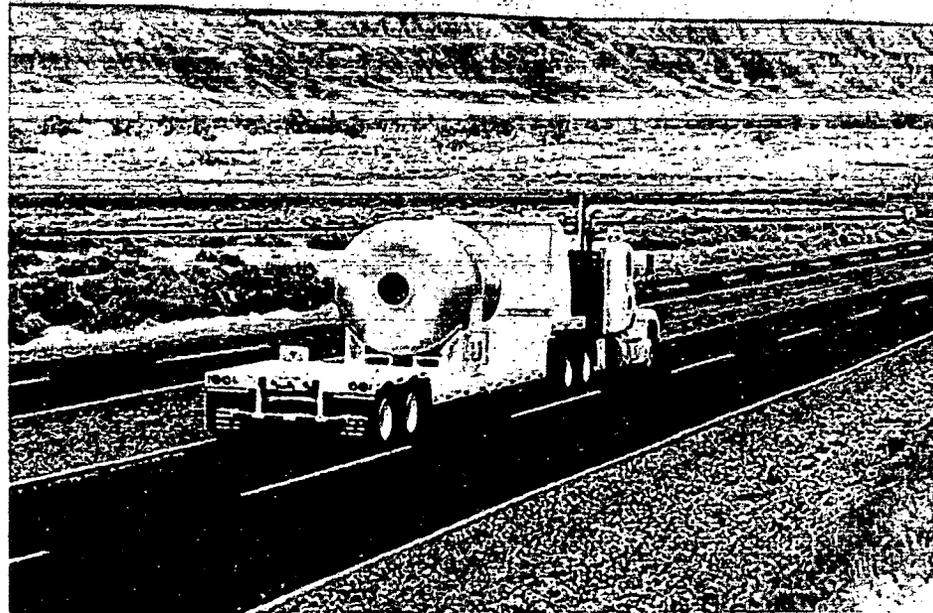


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Used Fuel Disposition: Transportation

Develop the technical basis to allow safe and secure transportation of high-burnup fuels and a variety of waste forms. (To be started in FY 2011.)





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Used Fuel Disposition: Disposal

- **Geologic disposal will be required. Period.**
- **Establish the technical bases for a variety of potential disposal environments, including**
 - **Granite**
 - **Clay/Shale**
 - **Salt**
 - **Deep Boreholes**
- **No site-specific investigations.**



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Backup Slides



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Fuel Cycle Research and Development

Budget Summary
\$ in thousands

Program Element	FY 2010 Approp	FY 2011 Request
Separations and Waste Forms	41,615	31,324
Advanced Fuels	29,651	40,000
Transmutation R&D	4,288	0
Modeling & Simulation	26,009	15,570
Systems Analysis & Integration	14,783	15,664
Materials Protection, Accountancy & Controls for Transmutation	6,826	7,814
Used Nuclear Fuel Disposition	9,124	45,000
Modified Open Cycle	0	40,000
SBIR/STTR	3,704	5,628
Total:	136,000	201,000

■ **Mission**

- Research and develop nuclear fuel and waste management technologies that will enable a safe, secure, and economic fuel cycle.

■ **FY2011 Planned Accomplishments**

- Examine 3 fuel cycle strategies: once-through, modified open, and full recycle.
- Continue to develop advanced concepts for electrochemical processing and alternative waste forms.
- Begin to develop innovative fuel systems that support advanced fuel cycles.
- Provide technical expertise to inform decision-making for storage, transportation, and disposal of used nuclear fuel and radioactive waste.



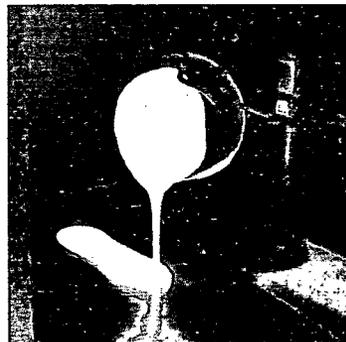
Nuclear Energy

Today's Technology Challenges

- Meeting current air emission requirements
- Economical recovery of transuranic elements for recycle/transmutation
- Minimal waste generation

Grand Challenges

- Near-zero radioactive off-gas emissions
- Simplified, single-step recovery of transuranic elements
- Significantly less process wastes



Development Path

- Develop fundamental understanding of separation process and waste form thermodynamics
- Understand underlying separation driving forces
- Exploit thermodynamic properties to effect separations
- Elucidate microstructural waste form corrosion mechanisms

Transformational Result

- Predictive capability for separation and waste form performance over a broad range of operational conditions
- Novel separations technologies



Nuclear Energy

Today's Technology Challenges

- Fuels with variable compositions
- Understanding and predicting fuel behavior and performance
- Reliably fabricating fuel with zero defects and with minimal process losses

Grand Challenge

- Light water reactor fuels with significant performance improvements related to uranium utilization
- Fast reactor fuels with multi-fold increases in performance over previous generation fuels, with very low fabrication losses, and that permit high transmutation of radiotoxic elements



Development Path

- Develop a microstructural understanding of fuels and materials
- Closure of combined transport and phase-field equations
- Separate effect testing and properties measurement at sub-grain scale to support modeling development
- Advanced irradiation techniques
- Innovative clean and reliable fabrication techniques with tightly controlled microstructures tailored to desired performance

Transformational Result

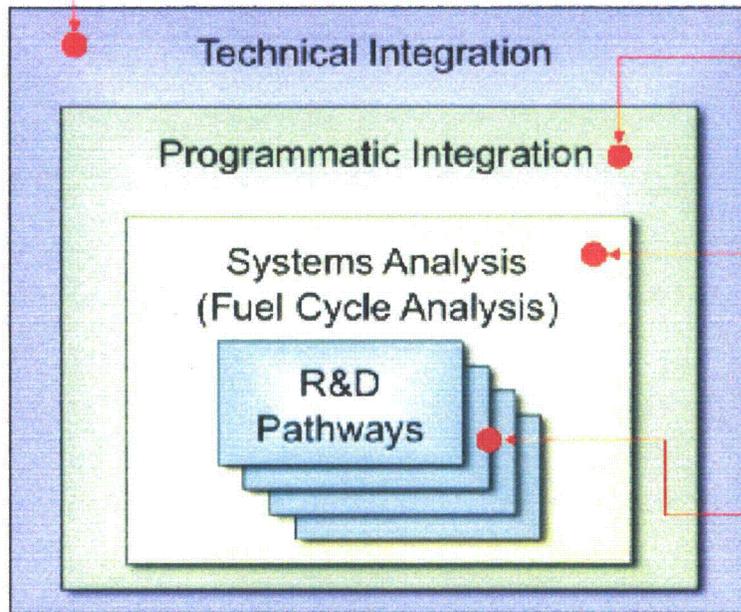
- Predictive capability for fuel process and in-pile behavior for a variety of initial and boundary conditions
- Novel fuel forms qualified for commercial use



SA, SE, and TI – How do they fit together?

Does it all make sense technically?
Are all the dots connected to reach the end (in time, and in space)?
Are we overlooking something

What if analysis:
• programmatic scenarios
• what would it take to implement a given scenario
- risk, cost, schedule, policy, etc...



What if analysis:
• technical scenarios
• what will the NE world look like if we implemented a given scenario with a given set of technologies

Develop technologies that are within the bounds a given fuel cycle scenario

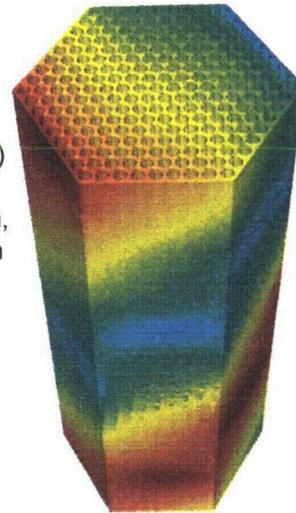


Today's Technology Challenges

- Current generation of nuclear modeling and simulation tools are empirically based
- Limited to use only for conditions very close to those experiments

Grand Challenge

Rapidly create and deploy "science" (first principles) verified and validated modeling and simulation capabilities essential for the design, implementation, and operation of future nuclear energy systems with the goal of improving U.S. energy security.



Development Path

- Create teams focused on developing Integrated Performance and Safety Codes
- Support smaller projects developing atomistic scale models and methods for upscaling to integrated codes
- Develop and implement methodologies for verification, validation and uncertainty quantification
- Ensure capability transfer pathways to users of modeling and simulation capabilities (labs, industry and regulatory agencies)
- Provide supporting computational technologies

Transformational Result

Develop modeling and simulation that is on par with theory and experiment to implement a modern science based approach for fuel cycle technologies.



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Nuclear Energy

Materials Protection, Accounting and Control for Transmutation (Fuel cycle systems and reactors)

Today's Technology Challenges

- Large throughput facilities require shutdown for periodic inventory
- New reactor designs require new nuclear material management approach – safeguards by design
- Move from reactive to preventive systems approach

Grand Challenge

Develop online, real-time, continuous, accountability instruments and techniques that permit an order of magnitude improvement in the ability to inventory fissile materials in domestic fuel cycle systems, in order to detect diversion and prevent misuse.

Development Path

- **Next generation instrumentation**
 - High sensitivity and specificity
 - Enabled by new physics data
 - New sensor materials
- **Integration of disparate data in quantitative manner**
 - Real time assessments
 - Probability basis with uncertainties
- **Predictive modeling and simulation at atomistic and plant level**

Transformational Result

Real time nuclear materials management with continuous inventory in fuel cycle facilities



Nuclear Energy

Today's Technology Challenges

- Storing and disposing UNF, HLW, GTCC, and LLW from a range of fuel cycles
- Understanding and predicting geologic repository performance
- Safe, secure, and cost effective storage, transportation and disposal

Grand Challenge

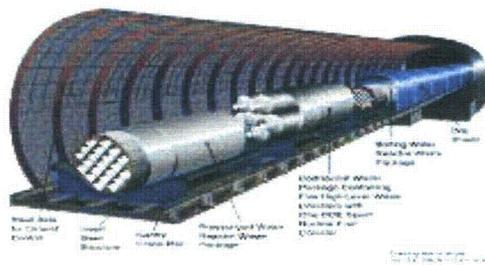
Integrated waste management with near zero radionuclide release from storage and disposal system

Development Path (with RW, EM)

- Develop an understanding of geologic repository performance
- Review extensive technical basis developed in the U.S. and internationally over the past several decades including recent work by SNL and LANL on a generic salt repository
- Explore a range of potential geologic settings, including granite, salt, clay, and tuff, and range of disposal concepts, including shaft-room, ramp-drift, and deep boreholes
- Investigate storage concepts for UNF and a range of waste streams
- Develop an integrated waste management strategy applicable to a range of fuel cycle options

Transformational Result

Predictive capability for performance of storage and disposal options for a range of fuel cycles

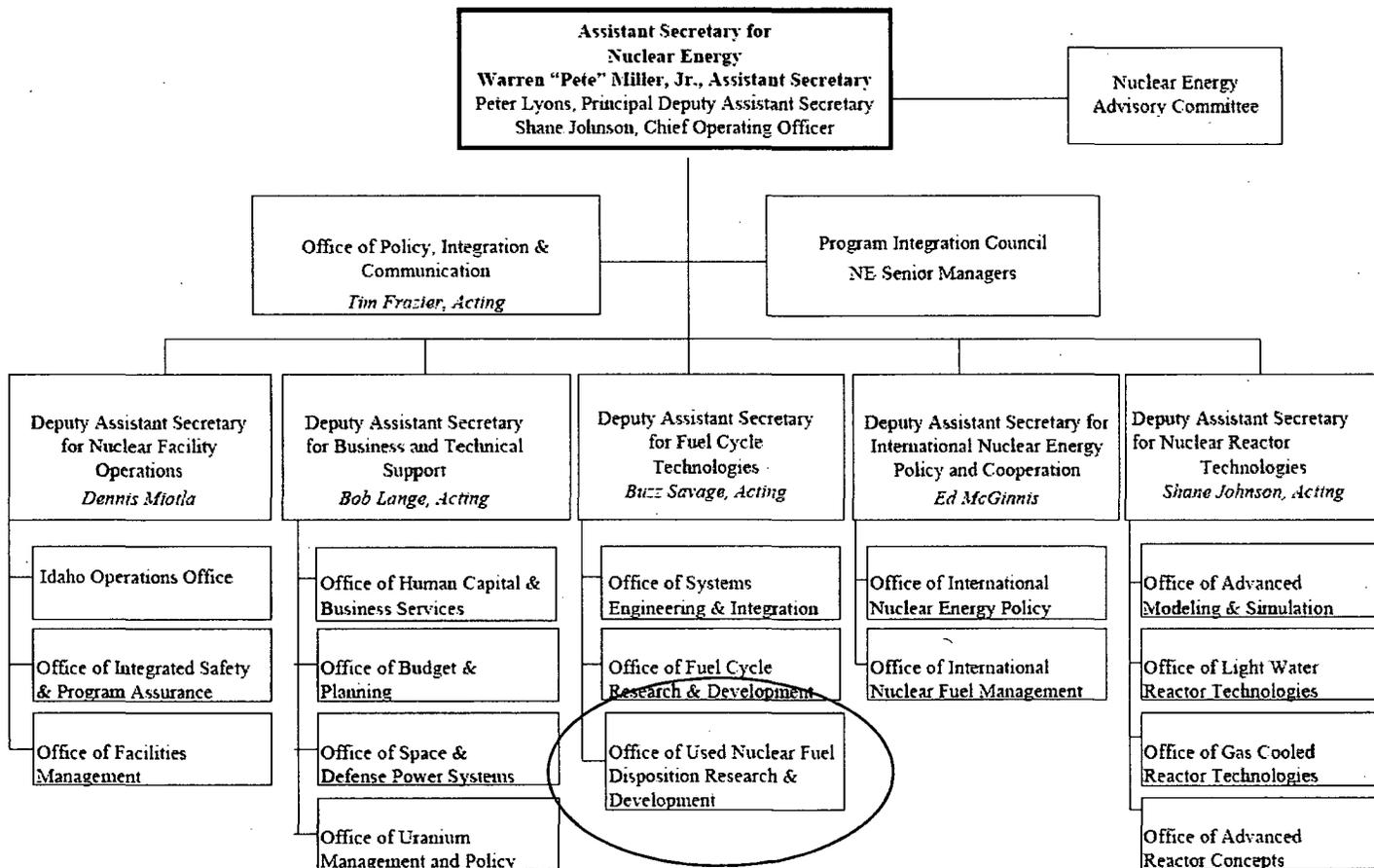




U.S. DEPARTMENT OF
ENERGY

Nuclear Energy

Office of Nuclear Energy: New Organization





U.S. DEPARTMENT OF
ENERGY

Nuclear Energy

Transfers of RW functions

- **Technical work from RW to NE**
- **Standard Contracts from RW to GC**
- **Fee Adequacy Report from RW to GC**
- **Litigation Support from RW to GC**
- **Records Retention from RW probably to LM, with funding from NE**

SNF a State Legislative Perspective

June 25, 2010

Delegate Sally Y. Jameson

Maryland House of Delegates

**Chair, NCSL Agriculture & Energy
Committee**

National Conference of State Legislatures

- **Non-profit, bi-partisan organization**
- **Members include all the state legislative bodies and their members — 7,500 legislators — and about 30,000 legislative staff.**
- **Offices in Denver and D.C.**
- **Among our goals – To provide legislatures with information about policy issue areas they address.**

NCSL Committees

- **NCSL Agriculture & Energy Committee and NCSL Environment Committee hold joint jurisdiction over the related SNF policies:**
 - **Radioactive Waste**
 - **Federal Facilities Management**

State Legislative Role

- **Developing state nuclear energy policy**
- **Meeting with our respective Congressional delegations**
- **Maintain relationships with U.S. Department of Energy officials**

State Legislative Role

- **Over the last year there has been a significant reduction in the department's state legislative outreach and legislators have felt that they have had to fight for a seat at the table.**

NCSL Radioactive Waste Policy

NCSL urges Congress and the administration/DOE to:

- **Work closely with state legislatures, local governments and governors to bring about interim storage for used nuclear fuel for the United States for a specific, limited period of time.**
- **Create a process that includes working closely with the nuclear industry and interested volunteer communities, localities and states.**
- **Pursue the development of one or two private Nuclear Regulatory Commission licensed, interim storage facilities to which used nuclear fuel can be safely shipped and stored until such time as a permanent repository is open and commercial nuclear fuel recycling facilities are available.**
- **Develop financing mechanisms, using the Nuclear Waste Fund, to support interim storage facilities.**
- **Determine the Department of Energy's role and responsibilities under the Nuclear Waste Policy Act in moving used nuclear fuel, including fuel from decommissioned plant sites, to interim storage facilities.**
- **If off-site interim storage of used nuclear fuel is enacted by Congress, the timeframe for storing such waste at interim storage sites should be no longer than 25 years.**

NCSL Radioactive Waste Policy

- **Recycling high-level waste/SNF should be a radioactive waste management priority. NCSL encourages Congress and the Administration to:**
- **Adequately plan for the Global Nuclear Energy Partnership (GNEP) in its development of a safe, cost-effective recycling program.**

NCSL Radioactive Waste Policy

- **Allow funding for appropriate recycling actions from the Nuclear Waste Fund, to include GNEP activities which accomplish initiation of high-level waste/SNF recycling to reduce the volume of waste requiring final disposal in a permanent repository.**

Transportation

- **NCSL, through its High Level Waste Working Group, has a long history of work on issues relating to the transportation of used nuclear fuel.**
- **NCSL recognizes the implications of any policy that shifts from DOE being the sole shipper to one where there are multiple private shippers and expects to be involved in any decisions.**

Irradiated Fuel Policy

(the only thing 'spent' is the money)

June 25, 2010

Mary Olson

Nuclear Information & Resource
Service, Southeast Office

No Safe Dose

- Since there is no safe dose of radiation, there is no “safe” radioactive waste
- It is our responsibility to LIMIT the total Source Term we give to future generations and the living systems of Earth

“Solutions” ???

- Forever More – radioactivity does not “go away” with burning, burying or boiling
- Shell Game – since we can’t “get rid of it” all we do is move it from pt A to pt B...
- Moving the waste for the purpose of making more = making problem bigger therefore the **opposite** of a “solution”

We never “had” a repository

- Chlorine-36 data from mid 90's showed Yucca was a bad site – should have dropped it then
- Chemistry of rock + containers + heat + water + oxygen = site a failure
- Many still reject burial at all

One Congressional District?

- Centralized “Interim” Storage (aka a “parking lot dump”) would put a back-log of waste into one Congressional District, leaving 1 member of Congress and 2 Senators to advocate for any further federal appropriations for that waste

- Transmutation reduces actinides while **increasing CURIES** – and therefore mutagenesis; 300 years hazard ≠ “short”
- Reprocessing makes matters worse – no reduction in curies; even *partial* separation of plutonium → PROLIFERATION and smearing it around makes an enormous, costly, enduring mess -> WEST VALLEY

Solution = Make More???

- Waste Contracts = waste leaves reactor site → property of US taxpayer – enormous (incalculable) corporate bail-out
- Plutonium on open market = bad
- New 2008 / 2009 DOE contracts = swindle of American People
- Waste problem gets BIGGER ≠ solution!

NRC beginning to ask right questions

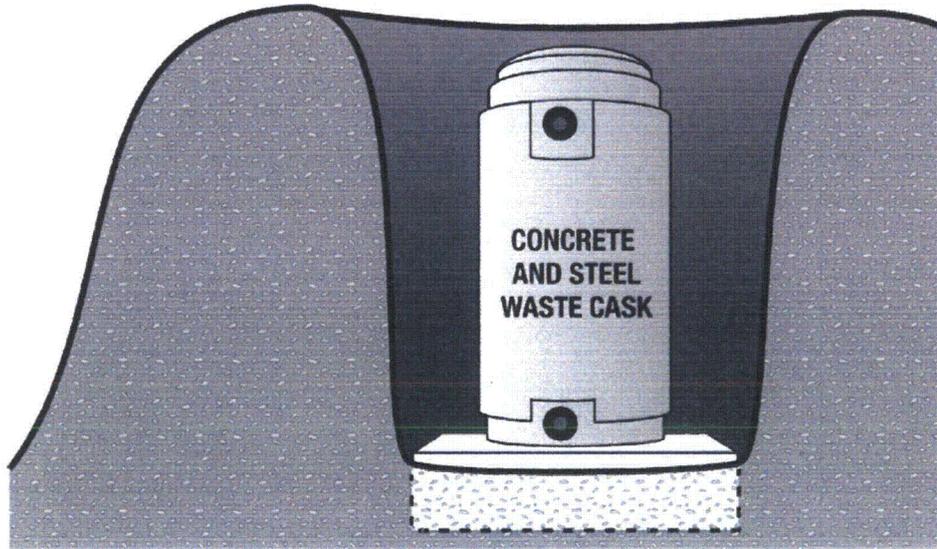
- BUT unless and until step out of role of facilitating more radioactive waste production, will not be credible
- Atomic Energy Act obligations have not been taken seriously – Homeland Security issues are enormous

Yes:

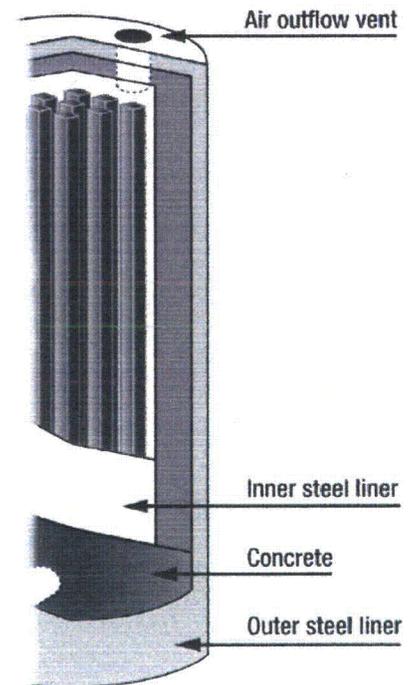
- Closed reactors are a driver
 - But NOT for “centralized interim storage”
 - “Stop making it” is basis for community cooperation and readiness to accept reality-based regulation

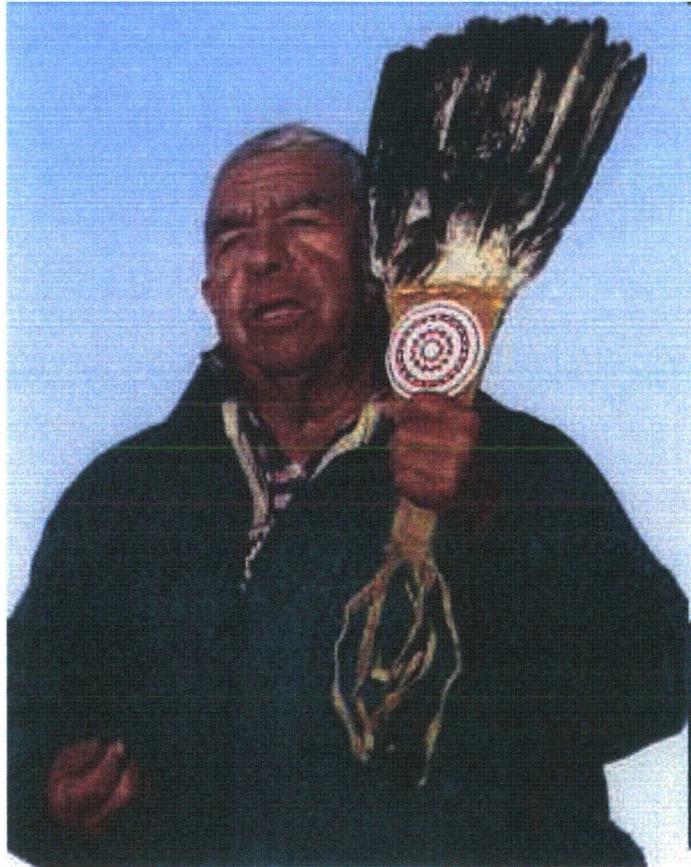
- Principles for Safeguarding Nuclear Waste at Reactor Sites (283 groups in 50 states):
 - Establish hardened on-site storage (HOSS)
 - Protect fuel pools
 - Require periodic review of HOSS facilities and fuel pools
 - Dedicate funding to local and state governments for independent monitoring
 - Prohibit reprocessing





**Potential Target: 24 to 36
Bundles of Nuclear Rods**





US NRC June 25, 2010 Briefing of the Commission

Irradiated Fuel Policy (the only thing 'spent' is the money)

Mary Olson

Nuclear Information & Resource Service, Southeast Office

maryo(at)nirs.org * www.nirs.org * 828-252-8409

Three attachments:

- Presentation slides (based on this paper)
- Principles for Safeguarding Nuclear Waste at Reactor Sites (with endorsements)ⁱ
- Letter to President Obama (May 2009) with cosignersⁱⁱ

This document is informed by 19 + years of service to communities directly impacted by nuclear power reactor operations, existing and proposed radioactive waste dumps, shipments of nuclear materials and wastes to and from these sites as well as the prospective proposed radioactive waste generating sites (new mines, fuel cycle factories and reactors) during my work for Nuclear Information and Resource Service (NIRS). It is further informed by the National Grassroots Summit on Radioactive Waste, recently convened in Chicago. I do not "speak for" anyone except NIRS. The NIRS membership reflects more than 200 local grassroots activist groups and more than 14,000 individuals across all 50 states; with a disproportionate composition of people who share a deep concern about / are impacted directly by radioactive waste.

A recurrent concern in our community is how to demonstrate positive engagement with these enormously important policy issues without thereby colluding with those who are making the problems we seek to solve worse. Increasingly our society values "positive, proactive participation" and yet we are suffering from deeper and deeper conflicts of interest on the part of so-called public "servants" who are on the one hand representing a public policy process, and on the other hand have corporate interests in their own pocket – or worse still, appear to be in the pocket of those interests.

What is so wrong with that? Corporations that profit from contaminating communities, contaminating our bodies, the bodies of our children are not ever going to have credibility...until they stop making more radioactivity. Certainly this has been a recurrent theme in feedback over the years from the commercial-nuclear impacted communities to their legally mandated "protector," the US Nuclear Regulatory Commission (NRC).

Our community has recently sent specific feedback / objections to both the US NRC about the conflict of interest inherent in the agency conducting its own "cancer study" (since the study is an evaluation of the effectiveness of NRC licensing) and subsequently to the NAS about conflicts on the Board at NAS that is commissioned to oversee the same study. We have also objected to the dominance of nuclear industry representatives and others who are supported by the industry on the Department of Energy's Blue Ribbon Commission on America's Nuclear Future, charged to make new radioactive waste policy recommendations. The fact that neither body has chosen to

incorporate members who credibly represent non-industry people who are directly impacted by nuclear industry operations leaves them open to “marginalization” (in the words of Tom Cochran of the Natural Resources Defense Council addressing the BRC).

The views expressed here will, I believe, “frame the debate.” Our bottom line is this: the only credible “solution” to the radioactive waste problem is to stop making more of it. Continued production of this material, predicated as it is on extraction and then a long chain of processing steps, each of which also produces collateral wastes results in worker exposures, routine releases of radioactivity by air, water, soil, community exposures and then transport of materials and wastes, resulting in more of the same – simply cannot be construed as a “solution.” As has been said many times over the years: “when a pipe breaks run for the wrench, not the mop!”

It is true that an enormous mass is already dedicated as “future” waste when the eventual decommissioning of the 104 “operable” reactors comes – this is given. What is not given is building new reactors, operating the existing ones for decades longer, or power up-rates that result in more intensely radioactive wastes.

NO SAFE DOSE

The National Academy,ⁱⁱⁱ independent researchers of great stature such as Dr Alice Stewart^{iv} and Dr Rosalie Bertell,^v and even the new “cutting edge” bio molecular research at DOE and NASA on radiation,^{vi} confirm that radiation is destructive to living tissue, that its impact is to “randomize” DNA and that cancer is not the only outcome. There are impacts on DNA including heritable and non-heritable birth defects, as well as impacts so catastrophic that they are a barrier to reproduction (spontaneous abortion, miscarriage, still birth). It is also now established that heart muscle can be impacted, and survivors of Hiroshima and Nagasaki are being compensated for these effects.^{vii} The Principle of Precaution^{viii} dictates that when there is the opportunity to choose a path that is protective and lowers risk, we must do so.

- Since there is no safe dose of radiation, there is no “safe” radioactive waste
- Since there are other ways to generate electric power that do not produce waste
- It is our responsibility to **LIMIT** the total **source term** we insert into Earth’s cycles...now, later...or “some day.”

What is done is done – but dealing with the pile of existing waste becomes pretext – and in the case of the NRC, literally “license” for generating more.

- Forever More – radioactivity does not “go away” with burning, burying or boiling

There is no technology that “stabilizes” an unstable atom. Once an atom is unstable, it is never “peaceful.” Irradiated fuel is famously a hazard for 11,000 human generations – but that is an under-estimate – NAS found that the peak doses from a Yucca Mt repository would start in the 100’s of thousands of years into a million + years.

- Shell Game – since we can't "get rid of it" all we do is move it from pt A to pt B...And actually, in the case of centralized interim storage (formerly MRS, and AFR) or reprocessing, it is A → B → C and sometimes D or F!!! The only entity that can possibly call a waste shell game a "waste solution" is the corporation that made the stuff in the first place and is relieved of any further liability (if the DOE takes it). It is patently false that such moves "put all the waste in one place" – unless and until all new waste generation ceases, centralization of waste merely makes **one more place!** Triggering the shipment of this material ensures that it is in a multitude of locations "in transit." The problem with calling transport "safe" is that this waste is not safe sitting still!

- Moving the waste for the purpose of making more = making problem bigger -- the opposite of a "solution"

This is the fundamental issue. An individual or organization or agency that says the "Waste problem is solved" and then proceeds to generate more of this waste is denying the points above, is delusional, or has a depraved indifference to human life.

Policy decisions are often made by people who do not even understand the technical definition of "source term"^{ix} and if they do understand that term, most often they are trained in physics or engineering – not biological science or medicine. The problem with nuclear energy is that it MAKES radioactivity (and plutonium). Radioactivity is mutagenic. Mutagenesis causes cancer, birth defects (both somatic and in the germ line) and some of these are catastrophic, meaning that the zygote or embryo is not viable (leading to spontaneous abortion, miscarriage, still birth or "infertility") as well as less defined impacts like "loss of immunity." Plutonium is of course the basis of nuclear weapons – another form of radiological hazard. No relocation of the waste in containers that will eventually fail can be construed as "a solution."

We never "had" a repository:

- Chlorine-36 data^x from mid 90's showed Yucca was a bad site – should have dropped it then
- Chemistry of rock + containers + heat + water + oxygen = site a failure^{xi}

The withdrawal of the license for Yucca Mountain by the Department of Energy is correct and long overdue. NIRS wrote the Petition for Disqualification of Yucca Mountain in 1998^{xii} – signed by more than 200 allied organizations^{xiii} – it stated that since the site, as demonstrated by the chlorine-36 finding, could not meet site suitability criteria contained in statute (specifically ground water travel time), it should be disqualified. Instead the rules were changed repeatedly^{xiv}, taking the national nuclear waste program out of the realm of science and putting it squarely in the realm of potential long term disaster. The subsequent revelations about the corrosive nature of the rock, action of the heat that would be intensified by industry goals to increase the waste burden at the site, and the fact that it is an oxidizing environment substantiated our 1998 assertion that Yucca was already a failed site.^{xv}

- Many still reject burial at all^{xvi}

It is worth noting that there is active discussion in the NGO community about the need for a new repository program vs the long-held view that it is safer to keep the waste where it can be monitored and where possible to recontainerize. Others view the proliferation risks as a reason to bury the waste^{xvii} – and a recent suggestion is that instead of a remote location, the waste could be buried under a city where it would be much more difficult for future plutonium hunters to find.

One Congressional District?

Irradiated fuel is currently located at every reactor site plus several Department of Energy sites plus GE Morris and West Valley former reprocessing sites, in more than 30 states...and more than 70 Congressional Districts.

- Centralized “Interim” Storage (a.k.a. a “parking lot dump”) would put a back-log of waste into one Congressional District, leaving 1 member of Congress and 2 Senators to advocate for any further federal appropriations for that waste^{xviii}

For any plan that is to be truly “temporary,” this is a very irresponsible strategy. There is nothing inherently better about one place – and unless or until all the radioactive waste production ceases, it is false to say that all the waste would be “in one site;” it would be in **one more site**.

- Transmutation reduces actinides while **increasing CURIES** – and therefore mutagenesis; 300 years hazard ≠ “short”

While NIRS concurs with our allies working to stop the spread of nuclear weapons that plutonium in reactor waste is a big problem – we do not agree that “burning up” plutonium or other transuranics is a “waste solution” – and we very much disagree that it would make the waste “safer.” While it is true that fissile materials pose a unique threat associated with the making and potential use of nuclear weapons – however the fission product yield from the fission of transuranics is more radioactive (“hotter”) than fission of uranium. There is ever more potential for cancers, birth defects, fertility impacts from the fission of plutonium than from the problematic reactors that we have today.

Dr. Edwin Lyman in analyzing the potential consequences of a major reactor accident where the core is using weapons grade plutonium (MOX) fuel found that the latent cancer fatalities double in direct proportion to the percentage of MOX fuel in use. No public servant should ever sign up for doubling what is already a major threat to public health, safety and security.^{xix}

NRC will find, when talking with local communities that 300 years will not be viewed as “temporary” – 1776 was less than 300 years ago...it is true that our nation is young, but most of my country men and women do not see it that way! The geologic timeframes that this material invokes are irrelevant to local decision-makers.

- Reprocessing makes matters worse – no reduction in curies; even *partial* separation of plutonium → PROLIFERATION^{xx} and smearing it around makes an enormous, costly, enduring mess -> like at WEST VALLEY^{xxi}
One of the small moments of sanity in the nuclear era was when President Ford declared a halt on the exports of reprocessing technology and then President Carter declared an end to any federal funding for this dirty, nasty, dangerous, most polluting part of the nuclear fuel chain.

The West Valley site operated for parts of six years, while the production achieved was only about 1/3 of the output projected for that period. Meanwhile spill after spill, fires and a wild disregard for the realities of the site (this soil on hard rock that will erode into Lake Erie within a period shorter than the Source Term committed to the soil at the site today). The clean-up for this site far exceeds any possible gain from the material reprocessed during its short run: nearly all cost, no tangible benefit.^{xxii}

It is not a rational moment in the history of this country or the world that the US Nuclear Regulatory Commission is considering writing regulations to support the reprocessing of irradiated fuel in the United States. In this era of malicious groups (terrorists) seeking fissile material, it is unthinkable that a nation like the United States would take the unprecedented step of announcing a plutonium economy. If it is not dangerous (and it is) it is definitely stupid, and if it is not dangerous or stupid (and it is) it is arrogant.

It is even less rational to hear policy pundits on the new Blue Ribbon Commission for America's Nuclear Future talk about bringing radioactive waste from all over the world to the US to prevent other countries from having the capacity to separate plutonium from reactor waste. The real experience with reprocessing in Europe has been under reported. The Irish Sea, the English Channel off Burgundy and several rivers in Russia are some of the most contaminated waters on Earth thanks to nuclear reprocessing sites. We do not need this legacy here!

Solution = Make More???

This round of Nuclear Commissioners has a rare opportunity – it could be the group that was remembered for ensuring a finite amount of radioactive waste from making electric power was generated in the United States. You could choose to oversee an orderly phase-out of the operating reactors and prevent any new licenses. The HERO status for such a commitment would be very large when looking back from a sustainable energy / sustainably healthy future. It is sad that there has been a lot of money poured into perpetrating the idea that nuclear is a panacea – it has been portrayed as such from the start of the Atoms for Peace program. Unfortunately the spread of “peaceful nuclear energy” has also been the spread of plutonium production. Plus, it is the destructive capacity of radiation that has been harnessed to kill cancer cells – there is nothing “peaceful” about radiation.

Once again nuclear is being promoted as THE “solution” – this time to the climate crisis – though any seasoned analyst knows it is physically impossible to use new reactor build to offset enough carbon as quickly as is needed -- as well as fiscally irresponsible.

SO once again NRC aides in the production of more waste – but why? This is certainly not a solution!

- Waste Contracts = waste leaves reactor site → property of US taxpayer – enormous (incalculable) corporate bail-out

The US Department of Energy has signed new contracts with energy corporations agreeing to take any newly generated irradiated fuel waste. Most of these contracts were signed in the waning hours of the Bush / Cheney administration – but several were signed during the transition between that administration and the current one. Key provisions ensure that the long-term disposition of the most concentrated radioactive waste (accounting for more than 95% of the total radioactivity in waste -- potential source term, in the USA^{xxiii}) will be the responsibility of the US taxpayer. For a summary of these contracts and the implications of the taxpayer obligation associated with them, see:

<http://www.beyondnuclear.org/radioactive-waste-whatsnew/2010/3/24/with-hasty-stroke-of-a-pen-bush-doe-transferred-billions-of.html>

Few have tried to calculate the value to the nuclear industry of the “take title” provision. Clearly many fission products will exceed the 300 year study period that NRC Staff is proposing. Even at 300 years, the dog-food bill (for security) becomes very large.

- Plutonium on open market = bad

In addition to all the previous comments – there is wide agreement that plutonium generated in a commercial nuclear power reactor should not be sold on an ‘open market’ or otherwise “available.” This is one of the biggest reasons in our view that NRC should get behind regulating the biggest reactor around – the one 93 million miles away – our Sun! No plutonium production from a solar panel!

- New 2008 / 2009 DOE contracts = swindle of the American People

Yup, that is how we see it. There was no notification, no vote in Congress approving this action by the White House and the Department of Energy, and yet the “value” to the nuclear industry is incalculable. “Cost recovery” by the waste fund does not include many real expenses, including any transport accidents (Price Anderson may cover) and any long-term problems with a repository (not clear).

- Waste problem gets BIGGER ≠ solution!

Repeat previous refrains...adding:

The Sun is the biggest source of power around – it also causes the winds to blow, and with a little help from the Moon, makes the tides... what more do we need? Power storage. Oh, yeah – that is where all the engineers and physics folks get jobs! Once base-load is redefined as supplying power 24 / 7 (instead of the false construct that one must make it 24 / 7) we will be fine.

NRC beginning to ask right questions

There has been substantial progress since fuel pools designed for 5 years of waste were thought to be sufficient. NRC is beginning to face the relevant questions – but seems to be lacking the integrity that would come from a realization that the only sane path forward is to limit and then END production of this material.

- BUT unless and until step out of role of facilitating more radioactive waste production, will not be credible

“...the first rule of holes...”^{xxiv}

- Atomic Energy Act obligations have not been taken seriously – Homeland Security issues are enormous

How many MAJOR public health / security threats could be cut in half in 30 days? It was a back-of-the-envelope-calculation – but apparently a reactor core drops 50% in potential source term in only 30 days. It is not the case that another 50% subsides in another 30 days – and this calculation does not address waste in storage at the site. However if the reactor were attacked with conventional explosives or other means to cause a core breach – there would be ½ as many latent cancer fatalities than if the reactor had NOT been turned off for those 30 days. This is stunning; particularly when you see figures that 20% end-user efficiency across the US is obtainable from relatively simple shifts in things like lighting.^{xxv}

Yes:

- Closed reactors are a driver
 - But NOT for “centralized interim storage”
 - “Stop making it” is basis for community cooperation and readiness to accept reality-based regulation

• Principles for Safeguarding Nuclear Waste at Reactor Sites (283 groups in 50 states):^{xxvi}

- Establish hardened on-site storage (HOSS)
- Protect fuel pools
- Require periodic review of HOSS facilities and fuel pools
- Dedicate funding to local and state governments for independent monitoring
- Prohibit reprocessing

This statement of principles is the strongest point of agreement among impacted communities / the concerned community / NGOs that work on radioactive waste policy.

It is NOT however an affirmation that ALL reactor sites are all qualified for HOSS, nor is it the case that reactor communities are volunteering for permanent storage. The fact is, no matter what the “next step” that DOE / NRC or any other entity manages to institute, there will be storage at these sites for decades to come. Given this fact, this community

supports robust security, independent local monitoring and categorically opposes the movement of the waste for plutonium recovery (reprocessing).

The presentation slides end with the image of Corbin Harney, a leader of the Western Shoshone Nation; below are the words of Rufina Marie Laws, a leader of the Mescalero Apache People – both groups greatly impacted by radioactive waste policy of the dominant society that produced this waste.

"As I met more people concerned with this issue, I realized that it takes on a much broader scope than just the Apache."

"We are giving support to other Native American groups across the country that are facing this issue....This radioactive waste knows no boundaries, be they geographical, political or racial."

-- Humans Against Nuclear Waste Dumps (HANDS)

One of my most difficult challenges as a representative of a non-government organization (NGO) has been finding an appropriate response to a Tribal Government "volunteering" to take the nuclear industry's waste. Many NIRS members are Native Americans, we work in collaboration with Native NGOs who work very hard on behalf of Tribal Sovereignty and self determination.

I finally came to see that the Tribal Government as a Sovereign Nation has the right to decide to build a radioactive storage site or dump – but I as a leader in the dominant US civil society and defender of human rights, future generations and our environment had a responsibility to oppose the EXPORT of our most deadly, mutagenic waste to be "dumped on" a small nation within our boundaries...or to paraphrase my colleague Kevin Kamps – the final solution that the nuclear industry and its supporters have found for this "worst of all wastes" is to drag it down a dirt road and dump it on Native Americans.

We as a People better be better than this.

ⁱ Attachments to this paper are also available on-line Principles for Safeguarding Nuclear Waste at Reactors is posted on the Blue Ribbon Commission for America's Nuclear Future at:

http://brc.gov/pdfFiles/May2010_Meeting/Attachment%203_HOSS%20PRINCIPLES-1.pdf

ⁱⁱ Letter to President Obama is available: <http://www.nirs.org/radwaste/hlw/obamaltersigners.pdf>

ⁱⁱⁱ National Academy of Sciences Biological Effects of Ionizing Radiation, I – VII have affirmed the linear-no-threshold view of radiation dose – response. Some have held that this view is "over protective" – but as time goes by the international community has consistently lowered the levels of "permissible" exposure.

^{iv} Dr. Alice Stewart is known for establishing that X-rays during pregnancy produced a 400% increase in childhood cancers. An annotated bibliography of this scientist's contributions by Michael Warren is available in: *J Epidemiol Community Health* 1988;42:309 doi:10.1136/jech.42.3.309 and available (no cost, only registration) at:

<http://jech.bmj.com/content/42/3/309.full.pdf>

^v Dr Rosalie Bertell, 1999. "Victims of the Nuclear Age," *The Ecologist*, November 1999, and "No Immediate Danger?" Summer Town Books, 1990.

^{vi} For instance: the DOE's Low Dose Radiation Research Program: <http://lowdose.energy.gov/faqs.aspx>

^{vii} Nuke Info Tokyo reports that myocardial infarction is currently being considered for worker compensation in Japan: <http://cnic.jp/english/newsletter/nit135/nit135articles/umeda.html>

Myocardial infarction is recognized for Hiroshima and Nagasaki hibakusha

<http://cnic.jp/english/newsletter/nit131/nit131articles/abombdisease.html>

^{viii} A simple statement of the Precautionary Principle is posted: <http://environmentalcommons.org/precaution.html>

^{ix} From NRC's glossary: Types and amounts of radioactive or hazardous material released to the environment following an accident; posted at: <http://www.nrc.gov/reading-rm/basic-ref/glossary/source-term.html>. The release of radioactivity over time from a waste disposal or storage site qualifies as "source term" even without a single "triggering event."

^x See: <http://www.state.nv.us/nucwaste/yucca/plut01.htm>

^{xi} See a simple overview from the Alliance for Nuclear Accountability:

<http://www.ananuclear.org/Portals/0/documents/ANA%20Yucca%20final.pdf>

^{xii} Petition to Disqualify Yucca Mountain as submitted to the Department of Energy 12/12/1998

<http://www.nirs.org/radwaste/yucca/disqualifyyuccapetitionfinal.htm>

^{xiii} Cover letter to Secretary of Energy Bill Richardson, with 219 groups supporting Petition for Disqualification of Yucca Mountain site from consideration as a national nuclear waste repository

<http://www.nirs.org/radwaste/yucca/disqualifyyuccafinalletterwithsignatures.htm>

^{xiv} There are several summaries of the regulatory divergence from science-based reason in the case of the Yucca Mt site – this one was published by Dr. Arjun Makhijani in 2003 and is cited here:

<http://www.ieer.org/comments/waste/yuccaitaly.html>

^{xv} Alison McFarlane, 2003. Underlying Yucca Mountain: the Interplay of Geology and Policy in Nuclear Waste Disposal. *Social Studies of Science* 33/5 (Oct 2003) 783-807.

^{xvi} See for instance the Nuclear Guardianship project <http://www.nonukes.org/r02ethic.htm>

^{xvii} Dr Makhijani is not alone in advocacy for a new repository program, but he is the easiest to cite:

http://www.ieer.org/comments/DOE_WasteContracts_IEERstatement2010.pdf

^{xviii} It is important to remember that the Waste Fund has always been "on budget" and subject to annual appropriations.

^{xix} Dr. Edwin S. Lyman, 1999. "The Impact of the Use of Mixed-Oxide Fuel on The Potential for Severe Nuclear Plant Accidents in Japan" <http://www.nci.org/j/japanmox.htm> and 2001 *Science and Global Security* Vol 9, pp 33-79.

^{xx} Frank von Hippel, September 2005 – Is US Reprocessing Worth the Risk? Posted:

http://www.armscontrol.org/act/2005_09/Fetter-VonHippel

^{xxi} For a wealth of information on West Valley former commercial reprocessing site see:

<http://www.nirs.org/radwaste/decommissioning/decommissioninghome.htm>

^{xxii} For details, see the report December 2008. *the Real Cost of Cleaning Up Radioactive Waste: A Full Cost Accounting of the Cleanup Options for West Valley Nuclear Waste.*

^{xxiii} See Integrated Spent Fuel Database DOE RW 0006 in many revisions – particularly 1992 which included pie charts by total volume and total radioactivity.

^{xxiv} ...is to stop digging!

^{xxv} See www.carbonfreenuclearfree.org

^{xxvi} See note # 1

Principles for Safeguarding Nuclear Waste at Reactors

The following principles are based on the urgent need to protect the public from the threats posed by the current vulnerable storage of commercial irradiated fuel. The United States does not currently have a national policy for the permanent storage of high-level nuclear waste. The Obama administration has determined that the Yucca Mountain site, which has been mired in bad science and mismanagement, is not an option for geologic storage of nuclear waste. Unfortunately, reprocessing proponents have used this opportunity to promote reprocessing as the solution for managing our nuclear waste. Contrary to their claims, however, reprocessing is extremely expensive, highly polluting, and a proliferation threat, and will actually complicate the management of irradiated fuel. Nor will reprocessing obviate the need for, or “save space” in, a geologic repository.

The United States has a unique opportunity to re-evaluate our nuclear waste management plan. We can make wise decisions about safeguarding radioactive waste or go down the risky, costly, and proliferation prone path towards reprocessing.

The undersigned organizations’ support for improving the protection of radioactive waste stored at reactor sites is a matter of security and is in no way an indication that we support nuclear power and the generation of more nuclear waste.

- **Require a low-density, open-frame layout for fuel pools:** Fuel pools were originally designed for temporary storage of a limited number of irradiated fuel assemblies in a low density, open frame configuration. As the amount of waste generated has increased beyond the designed capacity, the pools have been reorganized so that the concentration of fuel in the pools is nearly the same as that in operating reactor cores. If water is lost from a densely packed pool as the result of an attack or an accident, cooling by ambient air would likely be insufficient to prevent a fire, resulting in the release of large quantities of radioactivity to the environment. A low density, open-frame arrangement within fuel pools could allow enough air circulation to keep the fuel from catching fire. In order to achieve and maintain this arrangement within the pools, irradiated fuel must be transferred from the pools to dry storage within five years of being discharged from the reactor.

- **Establish hardened on-site storage (HOSS):** Irradiated fuel must be stored as safely as possible as close to the site of generation as possible. Waste moved from fuel pools must be safeguarded in hardened, on-site storage (HOSS) facilities. Transporting waste to interim away-from-reactor storage should not be done unless the reactor site is unsuitable for a HOSS facility and the move increases the safety and security of the waste. HOSS facilities

must not be regarded as a permanent waste solution, and thus should not be constructed deep underground. The waste must be retrievable, and real-time radiation and heat monitoring at the HOSS facility must be implemented for early detection of radiation releases and overheating. The overall objective of HOSS should be that the amount of releases projected in even severe attacks should be low enough that the storage system would be unattractive as a terrorist target. Design criteria that would correspond to the overall objective must include:

- Resistance to severe attacks, such as a direct hit by high-explosive or deeply penetrating weapons and munitions or a direct hit by a large aircraft loaded with fuel or a small aircraft loaded with fuel and/or explosives, without major releases.
 - Placement of individual canisters that makes detection difficult from outside the site boundary.
- **Protect fuel pools:** Irradiated fuel must be kept in pools for several years before it can be stored in a dry facility. The pools must be protected to withstand an attack by air, land, or water from a force at least equal in size and coordination to the 9/11 attacks. The security improvements must be approved by a panel of experts independent of the nuclear industry and the Nuclear Regulatory Commission.
- **Require periodic review of HOSS facilities and fuel pools:** An annual report consisting of the review of each HOSS facility and fuel pool should be prepared with meaningful participation from public stakeholders, regulators, and utility managers at each site. The report must be made publicly available and may include recommendations for actions to be taken.
- **Dedicate funding to local and state governments to independently monitor the sites:** Funding for monitoring the HOSS facilities at each site must be provided to affected local and state governments. The affected public must have the right to fully participate.
- **Prohibit reprocessing:** The reprocessing of irradiated fuel has not solved the nuclear waste problem in any country, and actually exacerbates it by creating numerous additional waste streams that must be managed. In addition to being expensive and polluting, reprocessing also increases nuclear weapons proliferation threats.

National

Leonor Tomero, Center for Arms Control and Non-Proliferation

John Issacs, Council for a Liveable World

Kevin Kamps, Beyond Nuclear

Lynn Thorp, Clean Water Action

Erich Pica, Friends of the Earth

Michele Boyd, Physicians for Social Responsibility

Jim Riccio, Greenpeace

Diane Kreiger, Nuclear Peace Age Foundation

Kevin Martin, Peace Action

Tyson Slocum, Public Citizen

Susan Gordon, Alliance for Nuclear Accountability

Arjun Makhijani, Institute for Energy and Environmental Research

Ken Bossong, SUN Day Campaign

Michael Mariotte, Nuclear Information and Resource Service

Anna Aurilio, Environment America

Winona La Duke, Honor the Earth

Dan Becker, Safe Climate Campaign

Dave Hamilton, Sierra Club

Geoffrey Fettus, Natural Resources Defense Council

Ed Lyman, Union of Concerned Scientists

Susan Shaer, Women's Action for New Directions (WAND)

Alaska

Stacy Fritz, No Nukes North

Alabama

Garry Morgan, Bellefonte Efficiency and Sustainability Team, Alabama Chapter of BREDL

Tom Moss, North Alabama Peace Network

Arkansas

Pat Youngdahl, Arkansas WAND

Arizona

Stephen M. Brittle, Don't Waste Arizona

Jack and Felice Cohen-Joppa, Nuclear Resister

Patricia Birnie, GE Stockholder's Alliance

Russell Lowes, SafeEnergyAnalyst.org

Barbara Warren, Arizona Physicians for Social Responsibility

California

Rochelle Becker, Alliance for Nuclear Responsibility CA

David Hartsough, PEACEWORKERS

Jane Williams, California Communities Against Toxics

Roland Valentine, Desert Citizens Against Pollution

Mary Beth Brangan, Ecological Options Network (EON)

Betty Winholz, SAVE THE PARK

Jacqueline Cabasso, Western States Legal Foundation

Molly Johnson, Grandmothers for Peace-San Luis Obispo County Chapter

Linda Seeley, Terra Foundation

Jane Swanson, San Luis Obispo Mothers For Peace Action Committee

Marylia Kelley, Tri-Valley CARES

Michael Welch, Redwood Alliance

Enid Schreibman, Center for Safe Energy

Jennifer Olarana Viereck, Healing Ourselves and Mother Earth

Dan Hirsch, Committee to Bridge the Gap

Pamela Meidell, Atomic Mirror

Colorado

Bob Kinsey, Colorado Coalition for the Prevention of Nuclear War

Sharyn Cunningham, Colorado Citizens Against Toxic Waste, Inc.

Judith Mohling, Rocky Mountain Peace and Justice Center

Connecticut

Nancy Burton, Connecticut Coalition Against Millstone

Judi Friedman, People's Action for Clean Energy

Sal Mangiagli, Connecticut Citizens Action Network, Haddam Chapter

Washington, DC

Louis Clark, Government Accountability Project

Delaware

Alan Muller, Green Delaware

Florida

Bob Krasowski, Florida Alliance for A Clean Environment, The Zero Waste Collier County Group

Georgia

Tom Ferguson, Foundatoin for A Global Community

Bobbie Paul, Georgia WAND

Glenn Carroll, Nuclear Watch South

Bob Darby, Food Not Bombs, Atlanta

Hawaii

Henry Curtis, Life of the Land

Iowa

Maureen McCue, PSR Iowa

Idaho

Beatrice Brailsford, Snake River Alliance

Chuck Broschious, Environmental Defense Institute

Illinois

Dave Kraft, Nuclear Energy Information Service

Carolyn Treadway, No New Nukes

Indiana

Grant Smith, Citizens Action Coalition of Indiana

John Blair, ValleyWatch, Inc.

Kansas

Dave Pack, Kansas City Peaceworks

Anne Suellentrop, Kansas City PSR

Kentucky

Mary Davis, Earth Island Institute

Louisiana

Nathalie Walker, Advocates for Environmental Human Rights

Massachusetts

Debbie Grinell, C-10 Research and Education Foundation

Deb Katz, Citizens Awareness Network

Mary Lampert, Pilgrim Watch

Maryland

Dagmar Fabian, Crabshell Alliance

Johanna Neumann, Maryland PIRG

Max Obuszewski, Baltimore Nonviolence Center

Lucy Duff, Peace and Justice Coalition-Prince George's County

Maine

William S. Linnell, Cheaper, Safer Power

Bruce Gagnon, Global Network Against Weapons & Nuclear Power in Space

Michigan

Keith Gunter, Citizens Resistance at Fermi Two

Michael Keegan, Coalition for a Nuclear Free Great Lakes

Georgia Donovan, Izaak Walton League-Dwight Lydell Chapter

Terry Miller, Lone Tree Council

Patricia Gillis, Voices for Earth Justice

Alice Hirt, Don't Waste Michigan

Nancy Seubert, IHM Justice, Peace, and Sustainability Office

Lynn Howard Ehrle, International Science Oversight Board-Organic Consumers Association

Kay Cumbow, Citizens for Alternatives to Chemical Contamination

Ronald and Joyce Mason, Swords Into Plowshares Peace Center and Gallery

David Gard, Michigan Environmental Council

Steve Senesi, Kalamazoo Non-Violent Opponents of War

Minnesota

Danene Provencher, West Metro Global Warming Action Group, Inc.

Glady Schmitz, Mankato Area Environmentalists

George Crocker, North American Water Office

Bruce Drew, Prairie Island Coalition

Missouri

Mark Haim, Missourians for Safe Energy

Kat Logan Smith, Missouri Coalition on the Environment

Mississippi

Louie Miller, Mississippi Sierra Club

Montana

Florence Chessin, Missoula Women for Peace, a branch of Women's International League for Peace and Freedom

North Carolina

Lewis Patrie, Western North Carolina Physicians for Social Responsibility

E.M.T O'Nan, Protect All Children's Environment

Avram Friedman, The Canary Coalition

Jim Warren, North Carolina Waste Awareness and Reduction Network

Janet Marsh, Blue Ridge Environmental Defense League

North Dakota

Kandi L. Mossett, Indigenous Environmental Network

Jodie L. White, The Environmental Awareness Committee, Save Our Sacred Earth Campaign

Nebraska

Buffalo Bruce, Western Nebraska Resources Council

Tim Rinne, Nebraskans for Peace

New Hampshire

Will Hopkins, New Hampshire Peace Action

New Jersey

Paula Gotsch, Grandmothers, Mother and More for Energy Safety

Norm Cohen, Coalition for Peace and Justice-UNPLUG Salem Campaign

New Mexico

Mervyn Tilden, Sovereign Dine' Foundation

Janet Greenwald, Citizens for Alternatives to Radioactive Dumping

Joni Arends, Concerned Citizens for Nuclear Safety

Scott Kovac, Nuclear Watch of New Mexico

Greg Mello, Los Alamos Study Group

Don Hancock, Southwest Research and Information Center

Nevada

Judy Treichel, Nevada Nuclear Waste Taskforce

Jim Haber, Nevada Desert Experience

New York

Joanne Hameister, Coalition on West Valley Nuclear Wastes

Anne Rabe, Center for Health, Environment, and Justice

James Rauch, For a Clean Tonawanda Site (FACTS)

Barbara Warren, Citizen's Environmental Coalition

Phillip Musegaas, Riverkeeper NY

Tim Judson, Central New York Citizens
Awareness Network

Ohio

Chris Trepal, Earth Day Coalition

Terry Lodge, Toledo Coalition for Safe Energy

Sharon Cowdrey, Miamisburg Environmental
Safety and Health Network

Oklahoma

Marilyn McCulloch, The Carrie Dickerson
Foundation

Oregon

Dona Hippert, Oregon Toxics Alliance

Charles K. Johnson, Center for Energy Research

Nina Bell, Northwest Environmental Advocates

Kelly Campbell, Oregon Physicians for Social
Responsibility

Gerry Pollet, Heart of America Northwest

Pennsylvania

David Hughes, Citizen Power

Katherine Dodge, Northwest Pennsylvania,
Audobon Society

Gene Stilp, Taxpayers and Ratepayers United

Ernest Fuller, Concerned Citizens for SNEC
Safety

Patricia Harner, Philadelphia Physicians for
Social Responsibility

Dr. Lewis Cuthbert, Alliance for a Clean
Environment

Rhode Island

Sheila Dormandy, Clean Water Action Rhode
Island

South Carolina

Susan Corbett, South Carolina Sierra Club

Dr. Finian Taylor, Hilton Head for Peace

South Dakota

Deb McIntyre, South Dakota Peace and Justice
Center

Charmaine White Face, Defenders of the Black
Hills

Tennessee

Donald B. Clark, Network for Economic and
Environmental Responsibility, United Church of
Christ

Rev. Charles Lord, Caney Fork Headwaters
Association

Rev. Douglas B. Hunt, Interfaith Power & Light

Ralph Hutchinson, Oak Ridge Environmental
Peace Alliance

Rev. Walter Stark, Cumberland Countians for
Peace and Justice

Ann Harris, We the People, Inc.

Texas

Eliza Brown, SEED Coalition

Mavis Belisle, JustPeace

Gary Stuard, Interfaith Environmental Alliance

Craig Tounet, Austin Physicians for Social
Responsibility

Jill Johnston, Southwest Workers Union

Gary Zuckett, West Virginia Citizens Action Group

Wyoming

Mary Woolen, Keep Yellowstone Nuclear Free

Utah

Margene Bullcreek, Ohngo Guadedah Devia Awareness

Vanessa Pierce, HEAL Utah

Virginia

Scott Sklar, The Stella Group, Inc.

Elena Day, People's Alliance for Clean Energy

Vermont

Arnie Gundersen, Fairewinds Associates, Inc.

Clay Turnbull, New England Coalition on Nuclear Pollution

Chris Williams, Vermont Citizens Awareness Network

Margaret Harrington Tamulonis, Women's International League for Peace

Washington

Tom Carpenter, Hanford Challenge

Wisconsin

Charlie Higley, Citizens Utility Board

Bonnie Urfer and John LaForge, Nukewatch Wisconsin

Al Gedicks, Wisconsin Resources Protection Council

Judy Miner, Wisconsin Network for Peace and Justice

West Virginia

May 4, 2009

Hon. Barack Obama
President of the United States of America
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear President Obama:

We welcome your decision to curtail activity at the proposed Yucca Mountain radioactive waste site and endorse your plan to evaluate the nation's high-level radioactive waste and commercial irradiated fuel programs and policies. We want to be involved in this process and we hope it will be earnest, open, and transparent. In that spirit, we urge you to ask all levels of your Administration to embrace and honor this period of evaluation of nuclear waste policy and ensure that the voices of the public are heard in that evaluation.

We represent groups rooted in communities impacted by radioactive waste -- the generation, storage, and potential transportation of this dangerous material, as well as communities that have been targeted for, or currently "host" disposal sites. We are concerned for the health and sustainability of our communities. We are "stakeholders," in the original sense of the word, when it comes to radioactive waste policy.

It is deeply disturbing to us that Secretary Chu suggested that the Yucca licensing process might continue -- and also that acting DOE Assistant Secretary for Environmental Management Ines Triay recently traveled to a meeting in Georgia at which DOE contractors were urged by her office to pursue irradiated fuel storage and reprocessing -- long before the radioactive waste evaluation has even begun. We ask you and your team to conduct a real evaluation -- not prejudge the outcome.

President Obama, we applaud your commitment to sound science as the basis for sound public policy. In our view, there are few decisions that our government will make which rank, in terms of long-term impact, with the plan for this waste. Irradiated fuel contains more than 95% of the radioactivity generated to date by industrial-scale nuclear enterprise.

We wish to offer you our perspective on Yucca, on nuclear reprocessing, centralizing storage and on the current storage of irradiated fuel at commercial reactor sites.

It is our unequivocal finding that sound science has **not** been the basis of, nor the guide for implementation of the Yucca Mountain project; many of the organizations signing this letter have repeatedly called, and worked for the cancellation of the Yucca dump.

In 1987, when Congress amended the Nuclear Waste Policy Act, abandoning the deliberate repository site selection process of the Act and singling out the Yucca Mountain site as the only candidate repository site to be studied, it was understood that this was a purely political decision that the Nevada congressional delegation was

powerless to stop. In 1992, when it was evident that the Yucca Mountain site could not meet the EPA's general radiation protection standard for repositories, instead of rejecting Yucca, Congress rescued the site. It directed EPA to promulgate new, "reasonable" standards, specific to Yucca Mountain, consistent with recommendations of a National Academy of Sciences panel study to consider the technical bases for a site-specific Yucca Mountain radiation protection standard. A key portion of the new standard subsequently was overturned by the D.C. Circuit Court of Appeals for not being consistent with an important safety recommendation of the NAS report. The revised standard is now in litigation over how that safety recommendation is to be addressed.

By 1995, sufficient information existed to convince DOE that infiltrating water could move rapidly down through fractures in the mountain, incorporate radionuclides from the emplaced waste, and result in unacceptable radiation releases to the environment. This ultimately resulted in a Yucca Mountain repository strategy change by DOE to primary reliance on engineered, rather than natural, barriers to delay release of radionuclides. And in 2001, the recognition of technical flaws in the site resulted in the removal from DOE's Site Recommendation Guidelines of a site disqualification provision designed to assure that a site with such a hydrologic defect would not be considered for development as a repository – another change in the rules rather the application of them.

In 1998, many of the undersigned groups tried to have these same rules enforced by signing the "Petition for Disqualification of Yucca Mountain"¹ that put a spotlight on the fact that Yucca could not meet the original, legislatively defined Site Suitability Guidelines for a geologic repository with respect to rapid groundwater movement. With more than 200 organizations² supporting this petition, it was a grave disappointment that then-Secretary of Energy Bill Richardson did not act to disqualify the Yucca Mountain site. Richardson stated that he agreed with the Petition³, but paradoxically, did not act on it; stating only that further study was needed. We do appreciate that President Clinton was an ally we worked closely with in stopping the shipment of irradiated fuel to the Yucca site in Nevada during the 1990's while the site was still under study.⁴ We affirm to you today our backing, and readiness to work with you for a decision to suspend all activity at Yucca Mountain – and its ultimate cancellation.

We hope and ask that you will include in your policy review of radioactive waste, data and analysis from non-industry sources. Sound science and democratic inclusion of the public, particularly impacted communities such as ours, must be the basis for any plan going forward.

We cannot wait for that process, however, to deliver these urgent findings: reprocessing is not a credible plan for radioactive waste management and it is not a "waste solution." The volume of irradiated fuel is reduced; nonetheless *total waste* volume is substantially

¹ Petition for Disqualification of Yucca Mountain posted on-line at:
<http://www.nirs.org/radwaste/yucca/disqualifyyuccapetitionfinal.htm>

² Letter to Secy Richardson with Petition for Disqualification Signatories posted on-line at:
<http://www.nirs.org/radwaste/yucca/disqualifyyuccafinalletterwithsignatures.htm>

³ Letter from Secy Richardson to Michael Mariotte, Executive Director, Nuclear Information and Resource Service, January, 1999.

⁴ President Clinton issued veto statements on revisions to the Nuclear Waste Policy Act offered by nuclear industry-supporters during both his terms. A letter from White House Chief of Staff Panetta to Congress pledging this veto in 2000 is attached.

increased.⁵ Further, a robust solid, ceramic waste form is converted to a caustic, highly radioactive liquid⁶ -- not an improvement! Where reprocessing has been done, a substantial portion of intermediate liquid waste has either been directly discharged into water (France, United Kingdom, Russia, Japan) or has leaked into groundwater (Hanford, Savannah River Site, West Valley). "Dilution" is not a solution, particularly when the most efficient concentrating food chain is aquatic.

The claim that waste is "recycled" is inaccurate—only 1% is re-usable, and that is plutonium.⁷ Plutonium as a fuel is needlessly dangerous; in commerce this weapons-usable material could be diverted into the wrong hands.⁸ In a reactor plutonium is harder to control;⁹ if reactor control is lost, plutonium fuel results in twice as many fatal cancers as the same accident would cause if uranium fuel were in use.¹⁰

The claim that the uranium can be re-used is impractical since the attempts to do so during the Cold War resulted in catastrophic contamination of the uranium enrichment infrastructure.¹¹ These "hidden costs" or externalities must be included in an assessment of the cost of such a program, over and above the DOE's projected \$15 billion cost to build a reprocessing plant. Reprocessing is only an appearance of a solution. We also share the concern that many of the likely sites for reprocessing in the United States would unfairly impact low-income communities or low-income communities of color. Together we must find a better way.

Centralizing the storage of irradiated fuel is integral to reprocessing. We are concerned that any centralized storage site may become de facto permanent. Over the last four decades there has also been a long series of attempts to establish "centralized interim storage" independent of reprocessing: the defunct Monitored Retrievable Storage (MRS) program which toward the end systematically targeted Indian Reservations; the industry's "privatized" storage program – again targeting the Native Americans, first the Mescalero Apache Nation in New Mexico and the Skull Valley Goshute Reservation in Utah; a near decade of effort by the industry to change the Nuclear Waste Policy Act to allow centralized storage at Yucca, the sovereign treaty lands of the Western Shoshone Nation.

As a community we have worked, and will continue to work, to stop such plans—for five key reasons: first, the risks and hazards of transportation are compounded if the waste is taken to a "temporary" site; second, we do not believe that a site will be "temporary" as

⁵ Schneider, Mycle and Yves Merignac, April 2008. "Spent Nuclear Fuel Reprocessing in France." A report of International Panel on Fissile Materials. Posted as of 04-10-2009 at: http://www.fissilematerials.org/ipfm/site_down/vr04.pdf

⁶ *ibid.*

⁷ See Bob Alvarez, June 2008. Institute for Policy Studies "Nuclear Spent Fuel Recycling" posted at: http://www.comnet.nl/~akmalten/Alvarez_nuclear_recycling_June-21-2008-rev-2.pdf. And July 2008. Foreign Policy in Focus "Nuclear Recycling Fails the Test" posted at: <http://www.fpiif.org/fpif/tx/5351>

⁸ Union of Concerned Scientists June 2008. Nuclear Reprocessing: Dirty, Dangerous and Expensive. Posted on-line: http://www.ucsusa.org/assets/documents/nuclear_power/nuclear-reprocessing-factsheet.pdf

⁹ See, among others, Dana Powers of the Advisory Committee on Reactor Safety to the U.S. Nuclear Regulatory Commission, letter to Chairwoman Jackson, May 17, 1999 post at: <http://www.nrc.gov/materials/fuel-cycle-fac/mox/pdf/4621825.pdf> which raises specific concerns about response time to reactivity transients in the reactor core, and also Paul Leventhal, Nuclear Control Institute <http://www.nci.org/s/sp21297.htm>

¹⁰ Lyman, Edwin, 1999. Nuclear Control Institute, Public Health Consequences of MOX Fuel: NRC Reactor Licensing Issues. Posted at: <http://www.nci.org/ib12199.htm>

¹¹ See series of articles in the Washington Post, August – December 1999 from investigative journalist, Jobie Warrick, including: <http://www.washingtonpost.com/wp-srv/national/daily/sept99/paducah21.htm>

long as more of this waste is being generated; third, we do not see moving the waste just so more can be generated as appropriate policy; fourth, putting this most persistent and deadly of wastes in a single congressional district when there is not a fully funded permanent program in place does not facilitate ongoing congressional appropriation for this problem; and finally in the case of an Indian Reservation, we oppose the *export* of some of the worst wastes our dominant society has ever produced in order to dump it on the people of another Nation.

In addition to sharing these views we ask your help with the waste where it is today in existing decentralized storage—at reactors. This situation is not responsive to the concerns and needs of the communities where this storage is located. The activist community that has opposed Yucca Mountain over the past two decades engaged with community organizers in reactor communities. A dialogue was established about current waste storage practices and the needs of communities where that is currently happening. We would like to share the findings known as “Community Principles for Safeguarding Nuclear Waste at Reactors” with you. Please see the attached document¹². (also endorsed by over 200 groups nationwide). In summary these principles include:

- Potential for drain-down leading to fire in overloaded wet-storage pools. This is the single greatest danger at a nuclear site—and one of the greatest threats to homeland security today;¹³
- Pools should only store irradiated fuel for the first 5 years;¹⁴
- Dry waste containers must be built with more quality control and care;¹⁵
- Containers should include heat and radiation monitors;¹⁶
- Containers should not be visible from outside the site boundary;¹⁷
- Containers should not be put on a pad like bowling pins – rather should be spread out and “hardened” to prevent and minimize harm from a potential attack;
- Communities should have funding for monitoring;
- Storage should be reviewed on a regular, annual basis;¹⁸
- Those signing the “Principles for Safeguarding Nuclear Waste at Reactors” oppose reprocessing of the waste due to the increased number of waste streams and the potential for nuclear proliferation.

These minimal requests from communities that currently host this deadly waste and are most impacted now, and will likely remain so for decades to come, must be factored into

¹² Also posted on-line at: <http://www.citizen.org/documents/PrinciplesSafeguardingIrradiatedFuel.pdf>

¹³ Alvarez, Robert, Jan Beyea, Klaus Janberg, Jungmin Kang, Allison McFarlane, Gordon Thompson, Frank N. von Hippel. 2003. Reducing Hazards from Stored Spent Power-Reactor Fuel in the United States. Science and Global Security journal, posted on-line at: http://www.princeton.edu/~globsec/publications/pdf/11_1Alvarez.pdf and Board on Radioactive Waste Management, National Academy of Sciences, 2005. “Safety and Security of Commercial Spent Nuclear Fuel Storage” (public report).

¹⁴ Conversely, waste that has less than 5 years in liquid storage is too thermally hot to put in dry storage.

¹⁵ Kamp, Kevin, 2004. “Get the Facts on High-Level Atomic Waste Storage Casks.” Nuclear Information and Resource Service. Posted at: <http://www.nirs.org/radwaste/atreactorstorage/drycaskfactsheet07152004.pdf>, and “Summary of Oscar Shirani’s Allegations of Quality Assurance Violations Against Holtec Storage/Transport Casks.” Compiled by Kevin Kamps, 2004. Posted at: <http://www.nirs.org/radwaste/atreactorstorage/shiranialeg04.htm>

¹⁶ Currently there is no real-time monitoring of these installations at reactor sites in the U.S.

¹⁷ At Palisades in Michigan the containers are in clear view 150 yards from the water of Lake Michigan with no restriction on boat access; at Brown’s Ferry in Alabama, the waste is on a pad next to the fence on a deserted, but public country road; on Prairie Island, the waste containers are like bowling pins lined up across the street from the Prairie Island Indian Community Day Care Center. Many other sites are similarly vulnerable at this moment. Irradiated fuel in a single dry cask is sufficient source-term to create a clear and present danger to anyone downwind if the material were dispersed and would create an enormously expensive clean-up.

¹⁸ Current regulations of the U.S. NRC do not require any of the above.

a fair review of radioactive waste policy, particularly if future policy is to rely upon further storage at these sites.

We do not, however, support the continued generation of more radioactive waste—whether by extending the licenses of the existing reactors, expansion of the existing sites with the addition of new reactors, or from new reactor sites. Many of the undersigned are active intervenors in the proposed licenses for new reactors in part because generation of this very troubling waste is not an acceptable by-product of making electricity.

Today the cost of a new nuclear power plant is on par with retail prices for solar panels.¹⁹ “Nega-watts²⁰” generated through aggressive efficiency upgrades and standards for new construction are more than 10 times cheaper than building new reactors²¹ and also deliver far greater and more rapid reductions in Greenhouse Gas Emissions. When good design is employed, all new construction in the United States could be “net-zero²²” and retro-fits of existing buildings could reverse demand projections, obviating the need for expanded nuclear generation.

We look forward to working with you, your Department of Energy, Environmental Protection Agency, Council on Environmental Quality, and with Congress to explore options for the nuclear waste we have today. We will work diligently, and hope you and your administration will join us, as we anticipate that an honest, rational, science-based analysis of policy will show that when it comes to radioactive waste, prevention is the best medicine. We would like to work with you to stop the expanded production of this waste for which there truly is nothing except responsible long-term stewardship to achieve the goal of isolation—ensuring that it does not enter our air, our water, our food, or our children.

Sincerely,

Cc: The Honorable:

Vice President Joe Biden
Secretary of Energy Steven Chu
Senate Majority Leader Harry Reid
Speaker of the House Nancy Pelosi
Senator Barbara Boxer
Senator John Ensign
Representative Henry Waxman
Representative Ed Markey

¹⁹ Citations provided in Got Solar! Fact sheet posted at: <http://www.nirs.org/factsheets/gotsolar.pdf>

²⁰ Coined by Amory Lovins, Rocky Mountain Institute, a “Nega-Watt” is a Watt of energy that was previously required to do a certain task, which is no longer required, thanks to energy efficiency or conservation.

²¹ Lovins, Amory, 2008. “Forget Nuclear.” Rocky Mountain Institute. Posted at: <http://www.rmi.org/sitepages/pid467.php>

²² Net Zero cite

Representative Shelley Berkeley
Representative Titus
Representative John Hall
Secretary of the Interior Ken Salazar
Council on Environmental Quality Nancy Sutley
Commissioners of the US Nuclear Regulatory Commission

Organizational Signers

Diane D'Arrigo
Nuclear Information and Resource Service
Takoma Park, MD

Kevin Kamps
Beyond Nuclear
Takoma Park, MD

Tom Clements
Friends of the Earth
Washington, DC

Jim Riccio
Greenpeace
Washington, DC

Lois Gibbs
Center for Health, Environment & Justice
Arlington, VA

Allison Fisher
Public Citizen
Washington, DC

Daphne Wysham
Sustainable Energy & Economy Network
Washington, DC

Ken Bossong
SUNDAY Campaign
Takoma Park, MD

Kaye Kiker
Citizens Task Force
York, AL

Jack & Felice Cohen-Joppa
The Nuclear Resister
Tucson, AZ

Frank Subject
Air Water Earth
Lake Havasu City, AZ

David Krieger
Nuclear Age Peace Foundation
Santa Barbara, CA

Jane Swanson
Mothers for Peace
San Luis Obispo, CA

Casey Coates Danson
Global Possibilities
Los Angeles, CA

Michael Welch
Redwood Alliance
Arcata, CA

Lorraine Krofchok
Grandmothers for Peace International
Elk Grove, CA

Bradley Angel
Greenaction for Health and Environmental Justice
San Francisco, CA

Robert Gould
SF-Bay Area Physicians for Social Responsibility
San Francisco, CA

Steven Gorelick
International Society for Ecology
Berkeley, CA

Molly Johnson
Healing Ourselves & Mother Earth
San Miguel, CA

Martina Sumenjak Sabol
Slovenian Biomass Association
Jarenina, CA

Jane Swanson
Mothers for Peace
San Luis Obispo, CA

Chris Worcester
Solar Wind Works
Truckee, CA

Dorothy Reik
PDSMM
Topanga, CA

Joseph A Perkins
pointfocus.com
Forestville, CA

Wendy Oser
Nuclear Guardianship Project
Berkeley, CA

Nancy & Ken Macy
The Valley Women's Club of San Lorenzo
Valley Boulder Creek, CA

Brian Stauffer
Discerning Skies Weather Services
Aptos, CA

Barbara Henderson
Somanypostcards
Paicines, CA

Lillian Laskin
Westside Progressives of Los Angeles
Los Angeles, CA

Rigg Kennedy
SAG/Actors Equity
Los Angeles, CA

Jeremiah Ridenour
Wise Solutions, Inc.
Corralitos, CA

Carolyn Scarr
Ecumenical Peace Institute/CALC
Berkeley, CA

Renee Nelson
Clean Water and Air Matter
Bakersfield, CA

Warren Linney
World Stewardship Institute
Santa Rosa, CA

Pat Dressler
Grandmothers for Peace
Hanford, CA

Linda Seeley
Terra Foundation
San Luis Obispo, CA

Dixie van der Kamp
Corbin Harney Trust
Santa Rosa, CA

Anne Dunlap Pastor
Comunidad Liberación/Liberation Community
Denver, CO

Nancy Burton
CT Coalition Against Millstone
Redding Ridge, CT

Jane Latus
Canton Advocates for Responsible Expansion
Canton, CT

Judi Friedman
PACE (People's Action for Clean Energy, Inc.)
Canton, CT

Starling Childs
Berkshire Litchfield Environmental Council
Norfolk, CT

Jana Stacy
Florida American Indian Movement
Ft Lauderdale, FL

Dale Gulden
Solar Direct, Inc.
Bradenton, FL

Jesse Glickstein
Faiths United for Sustainable Energy (FUSE)
Miami, FL

Todd Dripps
Everglades Earth First!
Palm City, FL

Barry Parsons
Environmental Alliance of North Florida
Madison, FL

Marilyn J. Blackwell
Help Save The Apalachicola River Group
Wewahitchka, FL

Bobbie Paul
Georgia Women's Action for New Directions
(WAND)
Atlanta, GA

Glenn Carroll
Nuclear Watch South

Atlanta, GA

Alex McNish
Idaho Mediation Association, Inc.
Boise, ID

Louis Landry
Snake River Alliance
Boise, ID

Carolyn Treadway
No New Nukes
Normal, IL

Craig Rhodes
Regional Assoc. of Concerned Environmentalists
Brookport, IL

Alesha Boyer
Collector's Shop
Zion, IL

David Borris
North Suburban Peace Initiative
Highland Park, IL

Carol Stark
Citizens Against Ruining the Environment,
C.A.R.E.
Lockport, IL

John Blair
Valley Watch, Inc.
Evansville, IN

Ann Suellentrop
Physicians for Social Responsibility – KC
Kansas City, KS

Nancy Givens, CoChair
BGGreen Partnership for a Sustainable
Community
Bowling Green, KY

Karen Wimpelberg
Alliance for Affordable Energy
New Orleans, LA

Deb Katz
Citizens Awareness Network
Shelburne Falls, MA

Jennifer Filiault
theCLEAN.org
Newton, MA

Mary Lampert
Pilgrim Watch
Duxbury, MA

John Ward
Greenfield Solar Store
Gill, MA

Deborah Andrew
Citizens Action Network
Shelburne Falls, MA

Randy Kehler
Safe & Green Campaign
Colrain, MA

Don Ogden
The Enviro Show; WXOJ-LP
Florence, MA

Richard Ochs
Md. Safe Energy Coalition
Baltimore, MD

Kevin Zeese
Democracy Rising
Takoma Park, MD

Michael Mariotte
Chesapeake Safe Energy Coalition
Takoma Park, MD

Karen D'Andrea
Sound Ecology
Scarborough, ME

Marjorie Vangsness
Dominican Sisters
Grand Rapids, MI

Michael Keegan
Coalition for a Nuclear-Free Great Lakes
Monroe, MI

Gladys Schmitz
Mankato Area Environmentalists
Mankato, MN

Lynne Mayo
Peace with Justice Neighborhood Committee
Minneapolis, MN

Jan Conley
EAGLE
Duluth, MN

Lea Foushee
North American Water Office
Lake Elmo, MN

Barbara Jennings
Midwest Coalition for Responsible Investments
St. Louis, MO

Mark Haim
Missourians for Safe Energy
Columbia, MO

Christine A Daum
Oasis Montana Inc.
Stevensville, MT

Louis Zeller
Blue Ridge Environmental Defense League
Glendale Springs, NC

Wells Eddleman
NC Citizens Research Group
Durham, NC

Jim Warren
NC WARN: Waste Awareness & Reduction
Network
Durham, NC

Ned Doyle
Southern Energy & Environment
Etowah, NC

Chad Chandler
Chad F. Chandler Architect, PA
Fuquay-Varina, NC

Buffalo Bruce
Western Nebraska Resources Council
Chadron, NE

Bruce Agte
Sawfish Woodworking
Montclair, NJ

Grace Costanzo
Jersey Shore Nuclear Watch
Toms River, NJ

Norm Cohen
Unplug Salem Campaign
Linwood, NJ

Elizabeth Cohen
hob'art
Hoboken, NJ

Rev. Larry Bernard, O.F.M.
St. Joseph Catholic Church
Laguna, NM

Scott Kovac
Nuclear Watch New Mexico
Santa Fe, NM

Candace Head-Dylla
Bluewater Valley Downstream Alliance
Grants, NM

Joni Arends
Concerned Citizens for Nuclear Safety (CCNS)
Santa Fe, NM

The Rev. Pamela Gilchrist
New Mexico Conference of Churches
Santa Fe, NM

Penelope McMullen
Loretto Community
Santa Fe, NM

Janet Greenwald
Citizens For Alternatives to Radioactive Dumping
Albuquerque, NM

Linda Hibbs
People for Peace
Santa Fe, NM

Jami Porter
Lara Anticipate, LLC
Albuquerque, NM

Judy Treichel
Nevada Nuclear Waste Task Force
Las Vegas, NV

Peggy Maze Johnson
Citizen Alert
Las Vegas, NV

Jane Feldman
Toiyabe Chapter of the Sierra Club
Las Vegas, NV

Jim Hyder
The Bungalow Club
Las Vegas, NV

Christine Brunner
Peace Action
Norwich, NY

Rosalie Yelen
CodePink Long Island Women for Peace
Huntington Station, NY

Susan Shapiro
PHASE (Public Health and Sustainable Energy)
Spring Valley, NY

Gerald Lotierzo
Peace Action of Central New York
Baldwinsville, NY

Manna Jo Greene
Hudson River Sloop Clearwater
Poughkeepsie, NY

Alice Slater
Nuclear Age Peace Foundation
New York, NY

Patricia Wood
Grassroots Environmental Education
Port Washington, NY

Peter Maniscalco
Renew Community Earth
Manorville, NY

Lee Blackburn
Southern Ohio Neighbors Group
Jackson, OH

Vina Colley
Portsmouth/Piketon Residents for Environmental
Safety and Security
Portsmouth, OH

Mark Stansbery
Community Organizing Center/For Mother Earth
Columbus, OH

Jon Blickenstaff
Footprints for Peace
Cincinnati, OH

Jim Toren
FootPrints for Peace
Amelia, OH

Marilyn McCulloch
The Carrie Dickerson Foundation
Tulsa, OK

Nina Bell
Northwest Environmental Advocates

Portland, OR

Paige Knight
Hanford Watch
Portland, OR

Lynn Sims
Don't Waste Oregon
Portland, OR

Michael James Long
James Gang Publishing, Ltd.
Eugene, OR

Mike Ewall
Energy Justice Network
Philadelphia, PA

Gene Stilp
Taxpayers and Ratepayers United
Harrisburg, PA

Donna Cuthbert
Alliance For A Clean Environment
Pottstown, PA

Eileen White
Grey Nuns Derby Social Justice Group
Roslyn, PA

David Hughes
Citizen Power
Pittsburgh, PA

Maureen Mulligan
Sustainable Futures Communications
Shermans Dale, PA

William Wharton Smith III
USA Nica Windpower Inc.
Jamestown, RI

Susan Corbett, Chair
South Carolina Chapter, Sierra Club
West Columbia, SC

William Reynolds
Bellefonte Efficiency and Sustainability Team
Chattanooga, TN

John Helper
Cumberland Green Bioregional Council Nashville,
TN

Donald Clark

Network for Environmental & Economic
Responsibility/United Church of Christ
Pleasant Hill, TN

Dennis Shekinah
Watauga Watershed Alliance
Mountain City, TN

Ann Harris
We the People, Inc.
Rockwood, TN

Irucka Embry
EcoC2S
Murfreesboro, TN

Peter Schweitzer
Plenty International
Summertown, TN

Ralph Hutchison
Nuke-Waste
Oak Ridge, TN

Jill Johnston
Southwest Workers Union
San Antonio, TX

Karen Hadden
Seed Coalition
Austin, TX

Trevor Lovell
ReEnergize Texas
Austin, TX

Mavis Belisle
JustPeace
Dallas, TX

Susan Dancer
South Texas Assoc. for Responsible Energy
Blessing, TX

Marianne & Ulrich Herrmann
True Cost of Nukes
Arlington, TX

Angel Grazioli
Comeron Iron Works
Beziers, TX

Gary Stuard
Interfaith Environmental Alliance
Dallas, TX

Gregor Gable
Shundahai Network
Salt Lake City, UT

Elena Day
People's Alliance for Clean Energy
Charlottesville, VA

Heather Peck
Building Heaven on Earth
Charlottesville, VA

Rosemarie Sawdon
Coalition for Peace & Justice
Blacksburg, VA

Bahri Aliriza
Polytrade International Corp.
Ashburn, VA

David Gascon
North Country Coalition for Justice and Peace
Lyndonville, VT

Debra Stoleroff
Vermont Yankee Decommissioning Alliance
Montpelier, VT

Chad Simmons
Safe & Green Campaign
Brattleboro, VT

Brian Tokar
Institute for Social Ecology
E. Montpelier, VT

Richard Hausman
Clean Yield Asset Management
Greensboro, VT

Gerry Pollet
Heart of America Northwest
Seattle, WA

Rick Fellows
Media Island International
Olympia, WA

Lou Ball
Friends of the White Salmon
Trout Lake, WA

Jay Bollman
Ground Zero for Non-violent Action
Dupont, WA

David Yao
APWU
Seattle, WA

Dan Goldstein
auntie nukers
Madison, WI

Laura Olah
Citizens for Safe Water Around Badger
(CSWAB)
Merrimac, WI

Marcia Halligan
Kickapoo Peace Circle
Viroqua, WI

John LaForge
Nukewatch
Luck, WI

Bryn Hammarstrom
Catholic Worker
Park Falls, WI

Al Gedicks
Wisconsin Resources Protection Council
La Crosse, WI

Jim Draeger
Peace Action Wisconsin
Milwaukee, WI

Individual Signers

Nancy, Givens, Bowling Green, KY
Courtney, Thomas, Horseheads, NY
Patricia, Phillips, Kent, OH
Rebecca, Swan, Austin, TX
Sandra, Joos, Portland, OR
J., Bleyer, San Diego, CA
Beverly, Harris, Rumson, NJ
Johanna Z, Mirenda, State College, PA
Barry, De Jasu, Northampton, MA
Robert, Rosenfield, woodmere, NY
Laurie, Litman, Sacramento, CA
Mary, Bunting, Baltimore, MD
Brigitte, Holden, HERNANDO, FL
Jonas, Magram, Fairfield, IA
Robin Y, Butler, Harrisburg, PA
Maggie, MacNeil, Muncie, IN
Jessica, Cresseveur, New Albany, IN
Kristin, Lukasik, New Rochelle, NY
Emily, Bialowas, Ardsley, NY
Ben, Larkey, Caldwell, NJ
Carole, Sarcinello, Moshem, TN
Patricia, Shine, Concord, VT
David, Grefrath, LEMONT, PA
Carol P, Gosnell, Leesburg, VA
Deborah, Sweet, West Plains, MO
dan, wood, providence, RI

John, Dixon, Fort Collins, CO
Mark, Marcoplos, Chapel Hill, NC
Diane, Crowe, Leverett, MA
Susan M, Patrie, Mohnton, PA
Joseph, Hess, East Lansing, MI
Doreen, Tignanelli, Poughkeepsie, NY
Terry, Gutman, Phoenix, AZ
Beth, Grundfest, New City, NY
Lana, Morano, MONROVIA, CA
Joan, Bindner, Mankato, MN
Charlie, Cooper, Baltimore, MD
Elizabeth, Neuse, Hamden, CT
Eliza, Brown, Austin, TX
Deanne, Dyke, Madison, WI
Tim, Wilson, Columbus, IN
Leslie, Kanat, Johnson, VT
Don, Devine, Chester, NY
Rebecca E, Keel, Brooklyn, NY
Heather, Faust, Catonsville, MD
Dee, Souza, Corvallis, OR
Gary, Wilde, Saginaw, MI
William, Blair, Boise, ID
Jeff, Douglas, Brooklyn, NY
T., Ponce, Columbia, MO
Donna, Cuthbert, Pottstown, PA
Karen, Giles, Portage, PA
Rigg, Kennedy, LOS ANGELES, CA
Dylan, Clayton, Chicago, IL
Gina, Gillig, Munich, Germany, of
Vivienne, Spector, Jenkintown, PA
M, Stephens, Philadelphia, PA
Patricia, Cook, Elyria, OH
Lisa, Lintner, hailey, ID
Sue and John, Morris, Marshfield, VT
David, Busch, Cherrylog, GA
Marie, Domenici, Mattituck, NY
Wayne, Lobue, Euclid, OH
Sue, Stroud, Brentwood Bay, BC
Kelly, Ray-Grady, Dallas, TX
Terry, Johnson, Centerville, MN
Ethan, Campbell, Hurley, NY
Karen, Martellaro, Lenexa, KS
Marty, Brown, Atascadero, CA
David, Gardner, santa monica, CA
Gary, Stuard, Dallas, TX
wedge, bramhall, ply, MA
Randal, Hanna, Cleburne, TX
Linda, Salamon, Harwich, MA
Liz, Hanellin, New York, NY
Robert, Place, Saugerties, NY
Kelly, Ray-Grady, Dallas, TX
wedge, bramhall, ply, MA
Stanley, Swiercz, Pelham, MA
joan, botwinick, university city, MO
Arbie, Hansen, Albuquerque, NM
Carolina, Van Stone, Baywood Park, CA
Larry, Wang, Santa Fe, NM
David, Hrushka, Edmonton, AB
Elizabeth, Segal, Tarrytown, NY
Deborah, Bradford, Aspen, CO
Annette, Haymaker, Nevada City, CA
Theresa J, Rossiter, West Linn, OR
Christopher, Norcross, Harwich, MA
Robert, Smith, Greeneville, TN
Michael, Murphy, Omaha, NE
Zohreh, Zohreh Whitaker, Gold River, CA
Joyce, Blumenshine, Peoria, IL
John, Nettleton, Portland, OR
Timothy, O'Connell, Falls Church, VA
John, Bailey, Grantsburg, WI

Marie, Domenici, Mattituck, NY
Bob, Schilling, South Deerfield, MA
Scott, Brown, Wrightwood, CA
Laura, Bundy, Fort Payne, AL
Paige, Spence, Athens, GA
Dot, Sulock, Asheville, NC
Lisa, Griffith, Ketchum, ID
Stephen, Gerould, Portland, OR
Tammy, Thompson, Westmont, IL
Lydia H. Grotti, Andrews, TX
Patricia, Garry, Cincinnati, OH
Paige, Spence, Athens, GA
Anne, Macksoud, Woodstock, VT
George, Stadnik, Astoria, NY
Shannon, Clarkson, Guilford, CT
K., Paro, Mystic, CT
Karen, Bosserman, Charlottesville, VA
Ken, Weiss, New Rochelle, NY
Charles, Morgan, Willimantic, CT
Claire, chang, Gill., MA
Megan, Gregory, Ithaca, NY
D, Peters, Bronx, NY
Brian, Ainsley, Laveen, AZ
lydia, saderman, forest hills, NY
Marianne, Clemente, Barnegat, NJ
Mark, Prebilic, Poolesville, MD
EDWARD, CIACCIO, DOUGLSTON, NY
Will, Small, Annapolis, MD
JoAn, Saltzen, Yreka, CA
Dan, Gagnon, Danvers, MA
James, Rome, Stow, OH
Dana, Stewart, La Mesa, CA
Barbara, Laxon, Miramar, FL
H. Macdaniel, Ball, Midway, UT
Debra, Patsel, STOCKHOLM, NJ
Robert, Livingstone, Oceanport, NJ
Robert, Blaedel, Damascus, OR
Jean, Naples, West Haverstraw, NY
Victoria, Reiners, Port Murray, NJ
Anne, Connolly, Leicester, NC
douglas, subbiondo, metuchen, NJ
Louis, Putney, Tampa, FL
Valerie, Rapport, Seattle, WA
Cathryn, Chudy, Vancouver, WA
Lenore, Traband, Woodbury, NJ
Eric, Staples, Cincinnati, OH
Charles, Leiden, Altoona, PA
Edward, Fields, Carlsle, MA
J. Kadir, Cannon, Narberth, PA
Carolyn, Demorest, Dublin, NH
Margaret, Mass, Chicago, IL
Anne, Whitefield, Durham, NC
John, Anthony, Pittsfield, MA
Mary, Hussmann, Columbia, MO
K, Barnes, Sherwood, MI
Anna, Rondon, Gallup, NM
Mary, Gilbert, Arlington, MA
Marc, Culley, Atlanta, GA
Claire, DuCharme, Ashland, MO
Gary, Patton, Santa Cruz, CA
Michelle, Fufaro, Brooklyn, NY
Amy, White, Fairview, NC
Janice s, flanagan, Reno, NV
Alberta, Mayo, Sierra Madre, CA
Shreema, Mehta, Takoma Park, MD
Judy, Ramsey, Tulsa, OK
Emily, lewis, Amherst, MA
Bryan, Shane, Toledo, OH
Emily, Maloney, Santa Cruz, CA
Travis, Payne, Raleigh, NC

susan, allison, boxborough, MA
R, Randrup, Sebastopol, CA
Sharon, Goodman, New York, NY
Matthew, Swyers, Livermore, CA
Kevin, Millar, Owego, NY
Patricia, George, Camp Verde, AZ
Jim, Sylva, Hansen, ID
Eileen, Kreutz, Industry, ME
Jeffrey, Smith, Algonquin, IL
Celeste, Wiechmann, Edmond, OK
Dana, Curtis, Dallas, TX
Rose, Garden, Lexington, KY
Michelle, Wenderlion, Canandaigua, NY
alice, SLATER, ny, NY
Lawrence, Williams, Trinidad, CA
Fred, Sokolow, Santa Monica, CA
ginger, cook, Goliad, TX
Samantha, Kngiht, Tampa, FL
Kendrick, Wilson, Tucson, AZ
Mario G., Rivera, Winter Haven, FL
Dennis, Rosatti, Camp Meeker, CA
Cruz, Montanez, Odessa, TX
Michael, Otto, st. Clair Shores, MI
virginia, greenwald, cloverdale, CA
Deborah, Wagner, Brookeville, MD
Frank, Smecker, Richmond, VA
Roger, Lippman, Seattle, WA
Sara, Diaz, Long Branch, NJ
Steven, Marx, san luis obispo, CA
Diane, Moore, Truckee, CA
Robert, McCombs, Arcata, CA
Sandra, Lewis, Victoria, TX
Janet, Lowenthal, Chevy Chase, MD
Sharon, Bauer, Watertown, MA
Bob, Johnson, Pittsburgh, PA
Robert, McCombs, Arcata, CA
Larry, Elmore, Lyons, CO
jack, bradin, Stuart, FL
Diane, Arnson Svarlien, Lexington, KY
Den Mark, Wichar, Vancouver, WA
Bill, Womack, Free Union, VA
M. C., Tompkins, houston, TX
Charlene M, Woodcock, Berkeley, CA
Marian, Naranjo, Espanola, NM
Susan, Feete, Huntington, NY
Dennis, Spisak, Struthers, OH
Meredith, Crafton, Seattle, WA
Sarah, Wallace, Orange, CA
Vernon and Mary Joyce, Dixon, Hiawassee, GA
Glenn, Daigon, Rockville, MD
Merrill, Bobele, El Granada, CA
Veronica, Jantzen, Greensboro, NC
Gary, Noren, St. Croix Falls, WI
Michael, Moats, Downers Grove, IL
Briana, Wagner, Hagerstown, MD
Helen, Caldicott, newton highlands, MA
Tim, Seitz, Kingston ON K7L2Z8, ON
Susan, Feete, Huntington, NY
Eric, Horstman, Weaverville, CA
Mark, Smith, San Diego, CA
Terry, Stuart, Longmont, CO
Neal, Rosenstein, Brooklyn, NY
Walter, Robbins, Kingston, ON
Brenda, Gaines, Blachly, OR
Robin, Buck, Washington, DC
Rebecca, Scott, Columbia, MO
Arthur, Holden, BERKELEY, CA
claudia, wier, ann arbor, MI
Jim, Eldon, Brooks, CA
todd, steiner, forest Knolls, CA

todd, steiner, forest Knolls, CA
John W., Howell, Bonham, TX
Fredie, Burdine, Lynchburg, VA
Melanie, Shouse, Overland, MO
Gerhard, Bedding, Keene, NH
Margret, Linich, Sterling, NY
Ian, Ford, Albuquerque, NM
Linda, Bessom, Cambridge, MA
Douglas, Renick, Florence, MA
Seth, Snapp, Bellingham, WA
Patricia, Aron, Jamaica Plain, MA
Joseph, Schroeder, Baltimore, MD
Jeffrey, Mariotte, Douglas, AZ
Stephen, Zerofos, Warren, OH
Mary Ellen, Strote, Calabasas, CA
Patricia, McHugh, MA, Saint Louis, MO
Jim, Sylva, Hansen, ID
Roy, Taylor, Canton, GA
Marian, Cooley, Muncie, IN
Mary Ellen, Strote, Calabasas, CA
michael, stephen, elmwood Park, IL
george, bissell, Dalton, MA
Marcela, Cruz, Santa Fe, NM
Susan, Feete, Huntington, NY
Gabriela, Bulisova, Alexandria, VA
Joel, Lobenthal, New York, NY
Jim, Reginato, Carpinteria, CA
Karen, Milstein, Santa Fe, NM
Rob, Seltzer, malibu, CA
Marilyn, Reece, Portland, OR
William, Hart, Saint Ann, MO
Elaine, Davis, Victoria, TX
Susan, Vickers, San Mateo, CA
Gillian, Comstock, Lincoln, VT
julia, montminy, jamestown, RI
Chris, Darling, Richmond, CA
Michael K, Emslie, Kimbolton, OH
Diana, Saba, Waverly, TN
TOM, CIVILETTI, OAK GROVE, OR
Jim, Walker, Tallahassee, FL
Paula, Gotsch, Normandy Beach, NJ
Elizabeth, Williams, Putney, VT
Marci, Levine, Los Angeles, CA
Joyce, Chase, New York, NY
janet, maker, los angeles, CA
Mary Ellen, Navas, Sandy, UT
Lisa, Cluver, Sunrise Beach, MO
Pamela, Todorovich, St. Louis, MO
Larry, Francis, Applegate, OR
Julie, Winsberg, Evanston, IL
Thomas, O'Grady, Cohocton, NY
Natasha, Shpiller, Chicago, IL
Robert, Brookshire, Portland, OR
Frank, van Schaik, Amsterdam, The Netherlands, ot
John, McPeek, Point Richmond, CA
Leo, Keightley, Waltham, MA
John, Rachow, Oxford, IA
chris, helmstetter, miami, FL
Steven, Cecchini, Hauppauge, NY
Sarah, Sweeny, Tivoli, NY
Lynn A, Surgalla, Monmouth Beach, NJ
F P, SWINSON, Buffalo Grove, IL
Stephen, Smith, Bethlehem, PA
wendy, forman, Philadelphia, PA
Michelle, Soule, denver, CO
Larry, Bulling, Corvallis, OR
John Alden, Thayer, Claryville, NY
joan, devlin rykiel, wall, NJ
Rebecca, Wiese, Davenport, IA
Mark, Feldman, Santa Rosa, CA

Vernon, Whitney, Houston, TX
Sharon, Johnson, Osceola, WI
Frederick, Rosen, Lower Gwynedd, PA
Anthony, Lorenzo, Sarasota, FL
Jennifer, Arce, Tampa, FL
Thomas, Harter, Albuquerque, NM
Ken, Knabb, berkeley, CA
Sally, Shaw, Gill, MA
Jay, Mittenthal, Urbana, IL
Margaret, Yonco-Haines, Garrison, NY
Larry, Lewis, Winter Garden, FL
Joy, Augenster, Hull, MA
Jim, Thomas, Chapel Hill, NC
shelle, michaelson, portland, OR
Katherine, Bryski, Brooklyn, NY
Nicholas, Parrish, Burlington, VT
Diane, Ireland, Magnolia Springs, AL
Valerie, Cole, Indianapolis, IN
Bobbie, Heimberg, Des Moines, IA
Jon, Block, Santa Fe, NM
Kenneth, Bowman, Black Mountain, NC
diane, olson, santa monica, CA
Erin, McMahon, SLC, UT
Deborah, Pendrey, Oak View, CA
Helena, Wu, Middletown Springs, VT
Dennis, Tannehill, Auburn, CA
Gloria A, Smith, Newark, OH
Tim, Chavez, Columbus, OH
Rebecca, Sommer, Brooklyn, NY
Martha, Grimley, Oceanside, NY
Debra, Beaulieu, Downingtown, PA
Dan, Sherburne, St. Louis, MO
martha, eberle, dripping Springs, TX
Nancy, CRAWFORD, Cromberg, CA
Les, Wilson, Torrington, CT
Doyle, Stadt, Saint Charles, MO
Bonnie, Morgan, Lahaina, HI
Charles, OMalley, Boulder City, NV
Christina, Countryman, Shokan, NY
Mary Jane, Williams, Washington, DC
Janelle, Hopper, Bothell, WA
Sandra E, Brill, San Luis Obispo, CA
David, Bonner, Lexington, MA
Susan, Bendickson, Minneapolis, MN
John, Crockett, Carmel, NY
Alexander, Schwartz, El Prado, NM
Mark, Pringle, Trinidad, CA
Fred, Lavy, Harrisonburg, VA
Tatiana, Moore, San Diego, CA
Walter and Susan, Cudnohufsky, Ashfield, MA
Carlo, Popolizio, Estell Manor, NJ
Jon, Hager, Riverton, UT
David, Schachne, Albany, NY
Marcia, Meisel, Royal Oak, MI
Margaret, McCasland, Ithaca, NY
Eckhard, Festag, Berkeley, CA
Stephen, Krofchok, Elk Grove, CA
ROBERT, DERRICO, VALLEY COTTAGE, NY
john, Mason, Greenbelt, MD
Christine, Balint, Aberdeen, NJ
Timothy, DenHerder-Thomas, St. Paul, MN
Norman, Baker, Sequim, WA
Kathleen, Morris, Columbus, OH
Tim, Barrington, Sunnyvale, CA
Susan, Futrell, Iowa City, IA
Scott, Brown, Boulder, CO
Laurence, Kirby, Woodstock, NY
Stacy, Reich, Jupiter, FL
Cara, Cooper, miami, FL
Laura, Read, Cincinnati, OH

Aaron, Lehmer, Berkeley, CA
Lewis, Eisenberg, Gardiner, NY
Kathleen, Rude, Deerfield, IL
Jenna, Dern, New Paltz, NY
Theodore, Warmbrand, Tucson, AZ
Albert, Fritsch, Ravenna, KY
Charles, Shelton, grottoes, VA
Stephen, Brittle, Phoenix, AZ
Gerard F., Mc Dade, New Town, PA
Suzanne, Pearce, Cambridge, MA
MaryJohn, VanderLoop, O.S.M., Ladysmith, WI
Dina, Kail, Guilford, VT
Doug, Kline, Somerville, MA
Elizabeth, Morrison, Los Angeles, CA
Patrick, Perini, hilliard, OH
joan, devlin rykiel, wall, NJ
Regina, Minniss, Baltimore, MD
James, Knight, Los angeles, CA
David, Randall, Port Jefferson, NY
Scott, Crews, Carrboro, NC
Adrienne A., Davis, Santa Barbara, CA
Bert, Taylor, Sarasota, FL
Estella, Moore, Durango, CO
Rochelle, Becker, Grover Beach, CA
Fred, Perkins, Omeme, ON
Joan, Russow, Victoria, BC
Steve, and Sybil Kohl, Brush Prairie, WA
Joele, Jaffe, Sarasota, FL
Lilli, Hoffman, Charlottesville, VA
Darby, Riley, San Antonio, TX
Tom, Sullivan, Turners Falls, MA
Patricia, Hespell, Shrewsbury, MA
Rosalie, Steward, petaluma, CA
Jeannette, Muzima, Northampton, MA
Floice, Lund, Moapa, NV
John, Feissel, Raleigh, NC
Andy, Lynn, Douglasville, GA
Allison, Busch-Lovejoy, Eureka, CA
Paula, Brennecke, Bonham, TX
John, Boomer, Milan, NM
Jan, Outcast, Cambridge, MA
Olivia, Haub, Garwood, NJ
gail, sabbadini, lakeside, CA
Jeannette, Muzima, Northampton, MA
Michael, Higgins, Portland, OR
Eli, Patsis, Mt Airy, GA
Elizabeth, Connor, St. louis, MO
Suzanne, Weatherman, Springfield, MO
Barbara, Nearing, Tempe, AZ
Richard & Carolyn, Rosenstein, Los Angeles, CA
Katie, Kadwell, Seattle, WA
tom, irwin, Altoona, PA
Emily, Pollom, Murray, KY
Sandy, Smith, Brogue, PA
Bev, Huntsberger, Altadena, CA
Rush, Rehm, Redwood City, CA
Rebecca, Holmes, Townshend, VT
mort, miller, harvard, MA
Elaine, Hughes, Archerwill, SK
Suzanne, Weatherman, Springfield, MO
Bill, Williston, grand rapids, MI
Beth, Adams, Greenfield, MA
tracy, Frisch, Greenwich, NY
Elizabeth, Johnston, Scottsboro, AL
Karen, Wagner, Wautoma, WI
paki, wieland, northampton, MA
Martha, Perez, Portland, OR
Joan, Sage, Philadelphia, PA
Bonnie, Koshofer, Schenectady, NY
Dorian, Breuer, Chicago, IL

Kellen, McIntyre, San Antonio, TX
Veronica, Hooker, New London, CT
Joyce, Follingstad, Portland, OR
John, Rodriguez, Tampa, FL
Alexis, Hmielak, fort collins, CO
Daniel, Vice, Bethesda, MD
Virginia, Corzine, Cloverdale, CA
Peder, Field, Baltimore, MD
Stefanie, Fortugno, Saskatoon, SK
Maureen, Primerano, Menlo Park, CA
Jane, Madsen, State College, PA
Sharon, Anderson, East Hartford, CT
Edwin, Young, Austin, TX
Bill, Hamilton, Portsmouth, NH
Leanne, Mazurick, Dallas, PA
douglas, sémbla, minneapolis, MN
Jane, Bark, Fremont, CA
Mary, Field Belenky, Marshfield, VT
Harry, Brooks, Chicago, IL
David, Reich, Jupiter, FL
Gabriel, Varkonyi, Saskatoon, SK
Joanna, Schmidt, Kimberley, BC
Barbara, Antonoplos, Atlanta, GA
Lawrence, Fine, Hudson, MA
Shiu, Hung, Menlo Park, CA
Wilbert, Griffith, Mountain City, TN
Richard, Blackley, Largo, FL
Louis, Cox, Charlotte, VT
Pat, Sanchez, Littleborough, ot
Jane, Madsen, State College, PA
Benjamin, Hiller, medford, MA
Alexis, Izor, Cincinnati, OH
Jan, Zlotnick, Sebastopol, CA
Carol, Mone, Trinidad, CA
James, Brunkow, Portland, OR
Lois, Butler, Sewanee, TN
Fran and Jim, Sage, Alpine, TX
amber, manley, st. louis, MO
Suzanne, Sutton, Rockville, MD
Joseph, Goldman, Alpine, TX
Cindy, Parker, Baltimore, MD
Jeffrey, Brown, Brick, NJ
Anne, Doherty, Teaneck, NJ
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morey, fox, sF, CA
Clark, Orwick, Plantersville, TX
Jack, Tobin, Old Hickory, TN
Darrell, Phare, Bellingham, WA
Barbara, Harris, New York, NY
philip, Klasky, San Francisco, CA
Harbhajan, Sandhu, Santa Rosa Valley, CA
david, beam, BALTIMORE, MD
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Jo, Beall, Portland, OR
Herb, Joseph, La Jolla, CA
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Mary, Daniels, Philadelphia, PA
Delores, Kincaide, Jemez springs, NM
kerry, burkhardt, kenmore, NY
Howard, Miller, Spring Hill, FL
Nancy Stone, Dickinson, Indianapolis, IN
Howard, Miller, Spring Hill, FL
Molly, Ferris, Chester, VT
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Jerrole E., Allen, Falls Church, VA

Harbhajan, Sandhu, Santa Rosa Valley, CA
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Jack, Stansfield, Stanwood, WA
Valery, Keramaty, Katonah, NY
Bruce, Rubin, Tampa, FL
Ted, Peck, Cambridge, MA
aimee, huyck, seattle, WA
Benjamin, Urmston, Cincinnati, OH
john, west, new hope, PA
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Tamara, Kinoshita, Las Vegas, NV
Joanne, Steele, Saint Remy, NY
Lee, Backus, Simi Valley, CA
Virginia, Germino, Charlottesville, VA
ivan, rarick, carmichael, CA
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Bob, Ranney, Battlefield, MO
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Rima, Givot, Sisters, OR
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Wilma, Ralls, Rohnert Park, CA
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natasha, mayers, whitefield, ME
R.M. 'Auros', Harman, East Palo Alto, CA
Joan, Balfour, Boynton Beach, FL
peter, rohonyi, budapest, ot
Susie, Day, New York, NY
mark, swanson, Ann Arbor, MI
Bill, Savarese, FT LAUDERDALE, FL
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Olga, Sekulich, Manhasset, NY
Larry, Harper, Sebastopol, CA
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tom, norwood, san luis obispo, CA
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Margaret, Stewart, Ketchum, ID
Michael, Brown, Eugene, OR
Molly, Brown, Mt Shasta, CA
Melinda, Cambiar, Munsonville, NH
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jon, spaR, Albq., NM
Tracey, Barnum, Bemidji, MN
Judy, Northrop, Laguna Woods, CA
Hollis, Zelinsky, State College, PA
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carol, maehr, Monterey, CA
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Edward, Butler, New York, NY
Jo, Doyle, Silver Spring, MD
Bal, Patil, Mumbai, ot
Alan, Sanborn, Arcata, CA
patricia, dolan, santa fe,
Harvey, Schaktman, Shelburne Falls, MA
Charles, Kiker, Tulia, TX
Ani, Kame'enui, Portland, OR

Carol, Stark, Lockport, IL
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Harvey, Schaktman, Shelburne Falls, MA
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Randy, Tashjian, Glendale, CA
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Thomas, Boyle, Baltimore, MD
richard, katz, las vegas, NV
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Paula, Gonzalez, Cincinnati, OH
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Mabel, McElhane, Hillsborough, NC
Lawrence, Wittner, Albany, NY
Bob, Aegerter, Bellingham, WA
alicia, moyer, West Townshend, VT
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Blanche, Korfmacher, San Francisco, CA
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Eileen, White, Roslyn, PA
alicia, moyer, West Townshend, VT
Ann, Edelman, San Diego, CA
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Annette, Guidry, Boise, ID, ID
carol, katz, las vegas, NV
Adrian, Akau, Pahala, HI
Leslie, Bradshaw, Ketchum, ID
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Karryn, Lintelman, Oxford, OH
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Robert, Belknap, Raleigh, NC
Julie, Enslow, Shorewood, WI
Ranan, Banerji, Los Angeles, CA
Susan, Dancer, Blessing, TX
Mads, Eskesen, 32 st th, ot
michael, andring, las vegas, NV
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Kathryn, Perkins, Concord, NH
Barbara, Campbell, Vidor, TX
April, Gerstung, Morris, IL

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penelope, johnstone, oakhurst, CA
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g., kortes, vancouver, WA
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Tim, Goslin, Boise, ID
sharon, kaiser, Sebastopol, CA
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Gayle, Tuch, Clemmons, NC
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Toni, Franklin, Friday Harbor, WA
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yvonne, eckstein, minneapolis, MN
Rudi, Nussbaum, Portland, OR
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Raphael, Eggeer, Glendale, CO
Rudi, Nussbaum, Portland, OR
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craig, leman, corvallis, OR
Liane, Casten, Evanston, IL
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B., O'Connor, Santa Fe, NM
Phyllis, Stanley, Lehigh Acres, FL
Shirley, Davis, Orono, ME
Ian, Iverson, Royal Oak, MI
Don, Rose, Largo, FL
Tom, Conroy, Naples, FL
Sally, Martin, Cambridge, MA
Girvani, Leerer, Allston, MA
Pat, Rose, Largo, FL
Lyn Clark, Pegg, Duluth, MN
Tom, Conroy, Naples, FL
Leonard, Hess, Stahlstown, PA
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Bob, Welsh, Salem, OR
Wayne, Peters, Greenfield, WI
Lucy, Calvillo, San Francisco, CA
Lesley, Weinstock, Albuquerque, NM
Joe, Futterer, Topanga, CA
Dina, Samfield, Shirley, MA
Richard, Khanlian, Santa Fe, NM

Toula, Polygalaktos, Apopka, FL
Judith, Langhans, San Diego, CA
Dorothy Shays, Dangerfield, Beacon, NY
Ken, Stein, Henderson, NV
Larry, Siegel, Plainsboro, NJ
Kevin, Lay, Anthem, AZ
Jacquelyn A., Estrella, Dexter, ME
Engin, Ege, Germantown, MD
Leon, Trumpp, Sedalia, MO
Richard, Bell, Washington, DC
Michael, Hanish, Guilford, VT
Susannah, Knox, Montclair, NJ
Vicki, Carver, PLATTSBURGH, NY
Beryl, Schwartz, Taos, NM
Philip, De Rosa, White Rock, BC
faye, butler, Fremont, CA
Luan, Makes Marks, Cazadero, CA
Betty, McElhill, Los Osos, CA
Joanne, O'Neill, Hampton Bays, NY
Don, PFAU, REDWAY, CA
Francis, Grabau, Santa Fe, NM
Jennifer, Neilson, PORTLAND, OR
Terence, Shumaker, Oregon City, OR
Howard, Brown, N. Kingstown, RI
Bill and Jane, Chaleff, East Hampton, NY
Claire, Schosser, St. Louis, MO
Rick, Hadley, Smithville, MO
Ann, Edelman, Los Angeles, CA
Maria, Limon, Austin, TX
Ken, Dow, New York, NY
Jeremy Warburg, Russo, Newton, MA
leslie, stalder, arcata, CA
Bob, Levitt, Bolinas, CA
William, DuSold, Severna Park, MD
Tammy, Green, Huntington, NY
Brian & Rita, Cohen, Fresno, CA
Cletus, Stein, amarillo, TX
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Gabriela, Waschewsky, Gainesville, FL
Howard, Cohen, Palo Alto, CA
Karen, Battaglia, Pittsburgh, PA
Sherry, Landsman, NY, NY
Richard, Kark, Asheville, NC
Leslie, March, Hillsboro, OR
Sarah, Gallagher, New York, NY
Joy, martin, St Louis, MO
Alice, Dugar, Independence, OH
Ann, Garrison, San Francisco, CA
Karissa, Silver, Washington, DC
janet, provost, superior, WI
Robert, Heron, Los Angeles, CA
bruce, cohen, worcester, MA
Ann, Duffell, Lancaster, SC
rand, zimmerman, silver springs, PA
Patricia, O'Leary, College Park, MD
Rob, Mills, Bloomington, IN
Ann, Garrison, San Francisco, CA
Virginia, Bower, Asheville, NC
George, Wall, Fort Wayne, IN
Lillia, Langreck, SSND, Milwaukee, WI
Hamad, Sindhi, Philadelphia, PA
Debbra, Haven, Sacramento, CA
Kathleen, Saul, Sammamish, WA
Mary, Stephenson, Solomons, MD
Hayden, Wayne, New York, NY
Laura, Cayford, Asbury Park, NJ
Carl, Friberg, Berkeley, CA
Sue, Morcos, Birmingham, AL

David, Merriman, Hartsville, SC
Sharon, Torrisi, Hermosa Beach, CA
April, Brumson, Putney, VT
Kenneth, Winer, Boise, ID
Abby A, Strasser, Joliet, IL
Frederick, Ruch, Melbourne, FL
james m, nordlund, fargo, ND
Sonia, Ness, Elk Grove Village, IL
Claire, Morgan, Portland, OR
Elizabeth, Bowers, Adelphi, MD
Emily, Butler, Norwich, no
Esta, Marshall, Honouanau, HI
kelly, naught, denio, NV
Leopold, May, Washington, DC
William, Lankford, Charlottesville, VA
Chuck, Baynton, Whitefish Bay, WI
Mae, O'Neill, Newtown, PA
Carol, Steffan, Las Vegas, NV
David, Corcoran, Des Plaines, IL
Dorothy, Werner, Bradenton, FL
James, Pittard, Charlottesville, VA
Mary Ellen, Hasbrouck, Mountain View, CA
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Joan, King, Sautee, GA
Vitalah Gayle, Simon, Hawthorne, NY
Lila, Garrett, Los Angeles, CA
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Joyce, McLean, Los Gatos, CA
Neal, Graham, Las Vegas, NV
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Nancy, Shaefer-Havens, Littleton, CO
Miki, Gillman, San Luis Obispo, CA
Jane, Driscoll, Lafayette, CA
Sarah, Williams, Portland, OR
Marianne, Stone, San Francisco, CA
Ann, Hale, Pinon Hills, CA
Murray, Kiok, Woodstock, NY
James, Stone, Santa Rosa Beach, FL
Ernest, Goitein, Atherton, CA
Karen, Prater, Lady Lake, FL
Lynn, Cardiff, Salem, OR
Alycia, Rosenberg, Ashland, OR
Mercy, Drake, Mesa, AZ
Alyssa, Paull, Balaclava, no
Fred, Golan, Los Angeles, CA
Charlotte, Koons, Northport, NY
Randy, Bartlett, Lahaina, HI
Janet, Fraser, Cayuga, ON
miriam, kurland, mansfield, CT
David, Emck, Mellen, WI
Rozann, Kraus, Cambridge, MA
William, Peltz, Albany, NY
pauline, wolf, finley, ND
Lucy, Kluttz, Greensboro, NC
Gary, shaw, croton on hudson, NY
Esther, Ho, Hayward, CA
susan, huesken, Cincinnati, OH
Enid, Rosenblatt, Moorestown, NJ
Charles, Lane, Lancaster, PA
Sharon, Vocke, Southington, CT
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D, McShan, Lafayette, CO
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Stacy, Robinson, Glenside, PA
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Graham, Hubenthal, Stanwood, WA
Calista, Nicholson, San Ramon, CA

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Joan, Allison, Corpus Christi, TX
Julian, JULIAN, TOMKINS COVE, NY
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nancy, krasnow, Newburyport, MA
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Venetia, Pimley, Albuquerque, NM
Geri, Rhodes, Tome, NM
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Buell and Donna, Hollister, Spokane, WA
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Wren, Osborn, El Cajon, CA
Robin, Gorges, Montpelier, VT
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Roberta, Richardson, Melbourne, FL
Deborah, Kreis, Sanford, ME
Matthew, Bennett, Port Washington, NY
Deborah, Crowchild, Sandgate, VT
Fran, Merker, Brooklyn, NY
Teresa, Reichmuth, O'Fallon, MO
Thomas, McKenzie, Los Angeles, CA
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Darla, Reynolds-Sparks, Yukon, OK
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Shawn, Wozniak, Greensboro, NC
David, Reilly, Santa Monica, CA
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Nicole, Schildcrout, Amesbury, MA
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Sande, Rego-Ross, Tucson, AZ
marley, green, harrisonburg, Va, VA
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Elaine, Holder, San Luis Obispo, CA
Elaine, Holder, San Luis Obispo, CA
Suzanne, Schwartz, El Prado, NM
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Beverly, Williams, Ashland, OR
Holly, Smith, Essex Junction, VT
myrna, seto, gold river, CA
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ed, haffmans, accord, NY
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Lisa, Benner, New York, NY
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Karin, Nelson-Rogers, Chicago, IL
Linda, Halverstadt, New Canaan, CT
Gordie, Albi, Eugene, OR
Mary, Dunne, Sparkill, NY
Rudy, Cypser, Katonah, NY
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Lorraine, Lee, Tijeras, NM
anita, staengl, alachua, FL
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Kathryn, Munson, Seattle, WA
Libby, Durbin, Otis, OR
Joseph, Duerksen, M.D., Roeland Park, KS
Julia, Lanigan, Yardley, PA
Mary, Jones-Giampalo, Mauston, WI
kolempas, Georgios, Volos, no
Dan, Edson, Newburyport, MA
Erik, Schiller, Knoxville, TN
Sara, Larson, Roseville, MN
Ruth, Strauss MD, Los Angeles, CA, USA, CA
Sharon, McIntosh, Westland, MI
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Sinan, Demirci, Ankara, ot
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Erik, Hanson, Lansing, MI
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Bruce, Duncil, Duluth, GA
barry, parsons, Madison, FL
John, Berkley, Fredonia, NY
barry, parsons, Madison, FL
James, Servais, Green Bay, WI
Lesley, Becker, Montpelier, VT
Carol, Duke, Williamsburg, MA
John, Berkley, Fredonia, NY
Judy, Slane, San Marcos, CA
Walter, Reece, Monterey, CA
Jerrad, Hardin, Panama City Beach, FL
susan, clark, SHERMAN OAKS, CA
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i.j., okaldek, NYC, NY
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Daryl, Regalbuto, Carlsbad, CA
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Karen, Campbell, Portland, ME
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Steve, Conrad, Henrietta, MO
Mana, Iluna, Bellevue, WA
Shawn, McConnell, Albany, NY
Sarosh, Batlivala, Gainesville, FL
Lea, Wood, Montpelier, VT
Susie, Foot, Mckinleyville, CA
Martin, Lutze, Lorch, ot
Michael, Kett, Lethbridge, AB
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Richard, Palmer, Jacksonville, IL
Suzanne, Valencia, West Melbourne, FL
Alexandra, Amonette, Richland, WA
Elizabeth, Kajer, Knoxville, TN
barbara, hawley, columbia, MO
Sharlene, White, Santa Fe, NM
Randolf, Hurst, Slate Hill, NY
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Bruce, Pringle, Normandy Park, WA
markus, broyles, honokaa, HI
Barbara, Bakie, Nixa, MO
Vera, Ellwood, Merriam, KS
Stacy, Black, Everett, WA
Marla, Loturco, Whitesboro, TX
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Murray, Hoffman, Midland, TX
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Jonathan, von Ranson, Wendell, MA
Elizabeth, Flower, Philadelphia, PA
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Sandra, Carrubba, Buffalo, NY
David, Marshak, Seattle, WA
David, Conna, Stow, MA
Mary-Ann, Palmieri, New Salem, MA
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Penny, Cragun, Duluth, MN
James, Roberts, Palouse, WA
Erial, Steiner, Laurel, MD
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Alicie, Geary, Saint Louis, MO

Mary, Clark, Lansing, MI
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Christine, Adams, Mayport, PA
Lisa, Peters, Portland, OR
june, veldheer, zeeland, MI
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stephen, couche, portland, OR
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Dale, Motiska, Vacaville, CA
sharman, murphy, Santa Cruz, CA
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Barry, Hatfield, Santa Fe, NM
John, Dousmanis, New York, NY
Ray, DiZefalo, Melbourne Beach, FL
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Paula, Newton, Townshend, VT
darwin, aronoff, Pasadena, CA
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Peggy, Porder, New York, NY
Sandra, Couch, Naperville, IL
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George, Gore, Decatur, GA
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anne, behroozi, San Jose CA 95125, CA
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Augustin, Garnier, Redondo Bch., CA
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Megan, Karth, Waupaca, WI
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Teo, Saenz, Kingsville, TX
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Debra, Monte-Wetzel, Saratoga Springs, NY
Dena, Rickert, Hamlin, NY
Noah, Myers, Columbia, MO
Sandy, Playa, Olga, WA
Caroline, Villa, Tucson, AZ
Susan, Peters, NY, NY
Nicholas, Totten, Columbia, MO
Theresa, Knapp, Towanda, PA
Mara, Segal, Arcata, CA
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Elizabeth, Case, boston, MA
Molly, Martin, Gainesville, FL
Milton, Shapiro, Philadelphia, PA
Leonard, Eiger, North Bend, WA
Fred, Immermann, Suffern, NY
anneke, corbett, florence, MA
Margaret, HARRINGTON.TAMULONIS, Richford, VT
Cynthia, Justice, Asheville, NC
Michelle, tuculet, Van Nuys, CA
Julie, Pasquale, Naalehu, HI
Caroline, Dawley, Dunedin, FL
Kenneth, Gilliland, Philadelphia, PA
Sara, Young, Craigs ville, WV
Jodi, Frediani, Santa Cruz, CA
donna, rubens, brooklyn, NY
Lana, Henson, Oklahoma City, OK
Frank, Goebels, Fullerton, CA
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Joan, Benham, North Canton, CT
Teresa, Foster, Longmont, CO
Patricia, Hamilton, Redway, CA
Karen, Donleavy, Caldwell, ID
John, Pollack, Omaha, NE
Sara, Young, Craigs ville, WV
Stephanie, Fairchild, Cambridge, OH
Karin, Ruoff, New Paltz, NY
Marjorie, Horn, Bloomfield, CT
Wanda, Ballentine, Eagan, MN
Debra Stoleroff, Stoleroff, Montpelier, VT
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Nora, Lachance, Clayton, NY
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nancy, mason, w. hartland, CT
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Jane and Rolf, Schulze, San Diego, CA
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Marilyn, Hart, Lake Pleasant, MA
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Marie-Ange, Bovee, Piermont, NY
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kathryn, santana, san marino, CA
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Shirley, Marcotte-Clazie, Riverside, CA
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David, Wright, Middletown Sp., VT
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debbie, wigrizer, villaanova, PA
cathy, sims, Wall, NJ
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irvin, simons, cincinnati, OH
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Otto, Palmer, Hermosa Beach, CA
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Colleen, Basaman, Waldorf, MD
Engfndbkh@Aol., Com, Ossining, NY
Greg, Wingard, Seattle, WA
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James, Marvin, St. Petersburg, FL
ordell, vee, madelia, MN
kathy, brown, pinckney, MI

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dora, haslett, portland, OR
Barbara, Busse, Phoenix, AZ
Kathy, Levine, Brooklyn, NY
Linda, Ashe, Chilliwack, BC
John, Schindler, Denmark, ot
janet, marsh, denmark, no
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Gilly, Burlingham, Portland, OR
Joseph, Bridy, Philadelphia, PA
Nadine, Podmoroff, Castlegar, BC
kirsten, rudestam, eugene, OR
Timi, Papas, Evanston, IL
Emilia, Kaiser, decatur, GA
Marina, Bethlenfalvay, San Luis Obispo, CA
Dixie, van der Knap, Santa Rosa, CA
Vanessa, Errol, Como Perth, no
Paula, Smith, Truckee, CA
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Charlie, Graham, Hillsboro, OR
esther, ouray, minneapolis, MN
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Franklin, Eventoff, Bow, WA
Sharon, Nolting, New York, NY
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carol, shinker, san francisco, CA
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John, Fuller, Spring Valley, NY
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lebrun, emmanuel, re, ot
Claudine, Edwards, Abbotsford, ot
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alice, vanleunen, amity, OR
margaret, dyson, cambridge, no
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Aysha, Gill, Oakland, CA
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Dolores, Pieper, Franklin, IN
colman, manning, s paris, ME
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Patience, Robbins, Mount Rainier, MD
mike, napolitano, new orleans, LA
amber, ladeira, Forest Park, IL
James, van Luik, Keene, NH
Shari, katz, Westmont, IL
Anna, Vaudin, Germantown, MD
Bob, Brister, Salt Lake City, UT
andrew, hanscom, nederland, CO
Jennifer, Berman, Arcata, CA
Gerald, Harrison, Upper Darby, PA
stefanie, smith, toms river, NJ
Deborah, Acs, Black Mountain, NC
Ani, Bourmoutian, Haworth, NJ
Deniseq, Webster, Louisville, KY
Marjorie, Michelly, Hollywood, FL
Gwen, Ingram, Drumright, OK

Lee, Johnson, Plattsburgh, NY
Daniel, Romeo, Huntington, MA
Laura, Green, Livonia, MI
CHRIS, BAUMANN, PLACITAS, NM
Richard, Liz, Poughkeepsie, NY
Maureen, Orozco, Hamilton, OH
joseph, ault, tulsa, OK
SANDRA, GAVUTIS, Newburyport, MA
Robert, Mahoney, Miami Shores, FL
Susann, McCarthy, Taos, NM
Mary, Fineran, Flouertown, PA
Kristie, Conrad, Hampton, NH
Isaac, Coleman, Asheville, NC
Kirk, Stone, Concord, NH
Abigal, Wright, Coralville, IA
Debra, Eades, Greenville, SC
Kathleen, Schmick, Wallingford., PA
Robert, Barnes, Seattle, WA
Debbie, Grinnell, West Newbury, MA
Adele, Myers, Meadow Valley, CA
Sylvie, Kashdan, Seattle, WA
Mark, Doppke, Albuquerque, NM
Tod, Edmondson, Hollywood, FL
Benjamin, Hitchner, Pitman, NJ
mitch, brown, decatur, GA
Joseph, Puentes, Rougemont, NC
Janice, Foss, El Cerrito, CA
Victor, Mc Manemy, Traverse City, MI
William, Palmisano, Santa Barbara, CA
randall, shields, Kalamazoo, MI
John, Scahill, Pittsburgh, PA
Peter, Frogner, Tullahoma, TN
Harriet, Elkington, Sheridan, WY
Neahle, Madden, R.N., Santa Rosa, CA
Habiba, Akhil, Albuquerque, NM
Jane, Meyer, Florence, OR
Dolores, O'Dowd, Albion, NY
Gretchen, Thomas, Oregon, OH
Charles, Ashley, Tollhouse, CA
Gina, Romola, Montgomery Village, MD
Margaret JOY, Spalding, Portland, OR
ingrid, alesich, Regina, SK
tim, petteys, saugerties, NY
Monica M, Frytak, Rochester, MN
Elizabeth, Million, McMinnville, OR
David, Rothauser, Brookline, MA
Nick, Espinosa, Minneapolis, MN
Anne, Craig, Asheville, NC
George, yntema, Bolton, CT
Bryana, Lancaster-Sokolow, Lafayette, CA
John, Amidon, Albany, NY
Hannah, Edlund, College Park, MD
cheryl, diersch, Burlington, VT
Sandra, Benzeev, Chicago, IL
robin, haynes, charlotte, NC
Amy, Dwyer, Salt Lake City, UT
Richard, Eldridge, Sayre, PA
Edward, Maestro, Rosendale, NY
terry, steel, Severna Park, MD
Vince, Cukrov, San Simeon, CA
Sylvia, Richey, Fort Myers, FL
Robert, Gunther, Islip, NY
Greg, Giorgio, Altamont., NY
Toby, Shimin, Cold Spring, NY
Helga, Motley, Ashland, OR
Michael, Welch, Arcata, CA
Daniel, Soetaert, Columbia, MO
mike, cohn, farmington hills, MI
Helen, Nicholas, Irvine, CA
Barbara, Rodgers-Hendricks, Santa Rosa Beach, FL

Rita, Ransom, Las Vegas, NV
cathy, sims, Wall, NJ
Lora, Royster, Orange, CA
andrea, ayala, san antonio, TX
Michael, Kellar, Anaheim, CA
Elena, Day, Charlottesville, VA
Barbara, Drageaux, portland, OR
Eric, Morris, St. Jacob, IL
Jane, Chischilly, Bisbee, AZ
Mark A, Peterson, Clementon, NJ
Jennifer, Therrien, Albany, GA
Jennifer, Cummings, New Paltz, NY
Laurie, Brewer, Barberton, OH
Alan, Wilkie, Edinburgh., ot
Diane, Zeitlin, Hoboken, NJ
elizabeth drew, loesch, katonah, NY
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brooke, fenton, desert hot springs, CA
Louis, Hellwig, Cedar Falls, IA
Lee, Sakkas, Truth or Consequences, NM
Mark, Carey, Rock Tavern, NY
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Alan, Wilkie, Edinburgh., ot
Gary, Krumwiede, San Diego, CA
Lynn, Jaeger, Roslyn, PA
Karen, Brander, Saskatoon, SK
Natalie, Lehman, Bullhead City, AZ
maria, cordemans, Mechelen, ot
chris, arno, portland, ME
donna, foley, ipswich, MA
Jim, Cullipher, Balsam Grove, NC
Carol, Kobus, Inglewood, CA
Sally Laidlaw, Williams, Oakland, CA
Kellie, Smith, Deering, NH
Marilyn, Shineflug, Lake Bluff, IL
Thomas, Connor, Walkkill, NY
Marilyn, Shineflug, Lake Bluff, IL
Don, Stephens, Portland, OR
guez, Rodri, Bayamó, PR
joan, smith, salt Lake City, UT
Lisa, Jenkins, North Las Vegas, NV
Leandro, Coutinho, San Francisco, CA
Sandra, Devine, Novato, CA
Aaron, Neumann, Minneapolis, MN
Kristin, Noel, Concord, NH
Katie, Simpson, Somerville, MA
Jan, Geren, Shasta Lake, CA
Susan, Bertolino, Philadelphia, PA
sophie, barnes, westport, CT
Simon, Sentamu, Arusha, ot
Carolyn, Trowbridge RN, Tucson, AZ
Mary, White, Concord, MA
J, Stufflebeam, Oregon City, OR
Raina, Rippel, Pittsburgh, PA
Carolyn, Wells, Seaside, OR
Karen, Marder, Thousand Oaks, CA
Angelique, Strahan, Fallbrook, CA
natalie, schmitt, chicago, IL
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John, Kurko, Mt. Laurel, NJ
Sassy, Smallman, Kennebunk, ME
Michael, Mariotte, Brentwood, MD
Bruce, Morgan, Riverside, CA
anoosh, mizany, Petaluma., CA
julia, dashe, san diego, CA
Kaji, Kirupanithy, Toronto, ON
Michael, Quinn, Burbank, CA
kristine, kubat, Keaau, HI
Judith, Schrier, Providence, RI
Edward, McManus, Berkeley, CA

Mary, Matheny, Indianapolis, IN
leatrice, brantley, ft lauderdale, FL
Lisa, Goldner, San Antonio, TX
carol, wagman, phx, AZ
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jon, moulton, hebron, CT
John, Dulik, Glenside, PA
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Erik, Hanson, Lansing, MI
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Manuela, Rodrigues, Rahway, NJ
Robin, Caceres, hermosa beach, CA
Richard, Geary, Oklahoma City, OK
David, Ireland, Marshall, NC
Carol A, Reece, Salem, OR
Wilma A, Wheeler, Mammoth Lakes, CA
Cathleen, Carlsen, Smithtown, NY
Saran, Kirschbaum, Los Angeles, CA
Miriam, Goodman, Huntington, NY
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Betty, Cottrill, Clarksburg, WV
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Michele, Crotty, Torrance, CA
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Prentiss, Childs, Arvada, NM
John, Snyder, Houston, TX
Darcy, Danielson, Sacramento, CA
Debra, Link, Santa Fe, NM
Manuel, Pino, Scottsdale, AZ
Lillian, Light, Manhattan Beach, CA
Alice, Dorsey, pearlance, TX
Emma, Squires, Irving, TX
Margaret, Day, San Antonio, TX
Stephanie, Mickle, Old Lyme, CT
Margaret, Day, San Antonio, TX
Easom, Bond, Kansas City, MO
Barbara, Blackburn, Portland, OR
Beverly, deGero, Jarbidge, NV
Henry, Coyle, Crawfordsville, IN
Frank, Goebels, Fullerton, CA
Susan, Singh, Tulsa, OK USA, OK
Gai, Oglesbee, Richland, WA
Shirley, Conant, Amherst, MA
david, Weisman, Morro Bay, CA
William, Hassel, Sedona, AZ
Gaylene, Hurley, Medford, OR
Martha, Atkinson, Valley, WA
Denise, Lytle, Fords, NJ
Glenn, Yocum, Las Vegas, NM
Kathleen, Dwyer, Monrovia, CA
Terrence, McNally, Los Angeles, CA
joan, mccooy, Saginaw, MI
Kathleen, Dwyer, Monrovia, CA
Arianna Alexandra, Collins, Ashfield, MA
Denise, Lytle, Fords, NJ
Michael, Steinberg, Niantic, CT, CT
Maria, Rua, Paterson, NJ
Kent, Newman, Ypsilanti, MI
Lynn, Harris, Wilmington, NC
MICHAEL, GOLD, studio city, CA
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Norman, Emmons, Charlestown, NH

Thomas, Grant, Vilas, NC
Mary, Finneran, Cairo, NY
Carsten, Larsen, Arcata, CA
Susan Spencer, Smith, Burlington, VT
Carsten, Larsen, Arcata, CA
Thomas, Grant, Vilas, NC
Kazuye, Suyematsu, Berkeley, CA
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Elizabeth, Apfelberg, San Luis Obispo, CA
rick, brown, Sevierville, TN
LOUIS, RENDON, PASADENA, CA
rick, brown, Sevierville, TN
patricia, daniels, arcata, CA
Roy, Guild, Portland, CT
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Daniel, Olson, Astoria, NY
Larry, Kirk, Fresno, CA
Elizabeth Morris, Downie, Fenton, MI
Chris, Cooper, Hawleyville, CT
Robert, Drewes, Tacoma, WA
Audrey, Keesing, Honolulu, HI
Joseph, Friendly, New York, NY
victoria, gold, philia, PA
Henry, Schwartzman, Coming, NY
Margaret, Waldman, New York, NY
Cheryl, Becker, Lake Bluff, IL
Sunday, Waldon, Marquette, MI
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Catherine, Thomasson, MD, Portland, OR
Betsy, Bickel, Durham, NC
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Lenora, Monkemeyer, Syracuse,, NY
Marjorie, Lev, Sacramento, CA
marijke, de vries, Albuquerque, NM
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Thomas, Bond, San Francisco, CA
Andrew, Davis, Brattleboro, VT
Lester, Schlosberg, Chicago, IL
Tony, Yang, Walnut, CA
Yu-Mei, Yang, Walnut, CA
Richard, Yang, Walnut, CA
Jo-Shing, Yang, Sacramento, CA
Michael, Tullius, Encino, CA
Roberta, Paro, Norwich, CT
Paul, Wright, Santa Barbara, CA
Joy, Johnson, Rochester, MN
Joy, Johnson, Rochester, MN
anita, kofta, holmen, WI
BiLL, Fowlie, harmony, ME
Rox, Fowlie, harmony, ME
roxie, schliesman, holmen, WI
Debra, Michaud, Chicago, IL
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Shielding, Cournoyer, Holyoke, MA
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Alicle, Geary, Saint Louis, MO
Katherine, Lett, San Antonio, TX
Dr. Jaime, Tamez, LOS RANCHOS, NM
john, owen, Perth, ot
Walt, Vasco, Wilsonville, OR
Susan, Young, Brunswick, OH
Dan, McKeel, Van Buren, MO
Dorthee, Wendell, MA
leeds, butler, springfield, MO
Priscilla, Massie, Allegan, MI
Nan & Ken, Vollbracht, Cooper City, FL
james, perkins, Leverett, MA
Dana, Bellwether, Petaluma, CA
Sha'an, Mouliert, St. Johnsbury Center, VT

Bia, Winter, Mount Vernon, ME
Edward, Miller, Oberlin, no
David, Grant, MD, Medford, OR
Heather, Johnson, Jasper, AB
Suzanne, Miller, Cleveland Heights, OH
Jeffrey, Ewing, Brooklyn, NY
Philip, Anderson, Crozet, VA
Jeffrey, Ewing, Brooklyn, NY
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Bonner, McAllester, Monterey, MA
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Andrea, Abbott, Oceanport, NJ
Coree, Kaleseed, Red Boiling Springs, TN
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Sean, Hoffmann, Langhorne, PA
Susan, Jordan, St Louis, MO
karen, ericson, bothell, WA
Geoff, Oelsner, Fayetteville, AR
John, Gilpin, Champaign, IL
Alan, Liska, Portland, ME
Nichole, Tockey, Memphis, TN
Luz Elena, Morey, Brattleboro, VT
Robert, Bisson, Stuyvesant, NY
Kellie, Petersen, Yelm, WA
Randi, Saslow, Hamden, CT
Alex, McNish, Meridian, ID
Paul, Hart, Stony Brook, NY
Richard, Pollini, Jamison, PA
Julie, Bannister, Tempe, AZ
Betsy, Eldredge, Springfield, VT
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James, Welke, Ferndale, MI
Suzannah, Bray, San Leandro, CA
Catherine, Murray, Johnson City, TN
Ronaldo, Marzullo, Rahway, NJ
Emma, Onawa, Frontenac, MN
Nancy, Newell, Portland, OR
Corinne, Carey, Grand Rapids, MI
Roger, Robison, Prescott, AZ
Sara, Burgess, Pahoa, HI
Lee, Truitt, Buena Vista, CO
susan, delles, Rogue River, OR
Helen Budd, Hanna, Lorraine, QC
Michael, Popowich Jr, Bronx, NY
William, Herke, PhD, Baton Rouge, LA
Enid, Norris, Stamford, CT
David E., Lilienthal, East Dennis, MA
Janne, Dennehy, Beverly Hills, CA
John, Fernandez, Hampstead, NH
Gerald, Ganann, Minneapolis, MN
Mike, Antone, Sacaton, AZ
Jan, Johnson, Roswell, NM
Glenn, Yocum, Las Vegas, NM
Brian, Paddock, Cookeville, TN
Jason, Bowman, Sacramento, CA
Carol, Sills, Baileys Harbor, WI
Thomas, Busam, Cannelton, IN
Warren, Clark, Mammoth Lakes, CA
Gladys B, Anderson, Lehigh Acres, FL
Jed, Michael, Philadelphia, PA
DEBORAH, SMITH, OKLAHOMA CITY, OK

Angelo, Vassos, Irvine, CA
Lee, Blackburn, Jackson, OH
Joseph, Bohan, Rye Brook, NY
Jeri, Fergus, Redway, CA
Diane, Schapira, Lakeville, CT
Amber, Thrasher, Port Hadlock, WA
Bill, Helmer, Independence, CA
Jane, Oberlander, Seattle, WA
gerson & debbie, lesser, bronx, NY
Debra Stoleroff, Stoleroff, Montpelier, VT
Allie, Bohm, Hastings-on-Hudson, NY
Joyce, Palaia, Avila Beach, CA
doreen, mcelvany, indian wells, CA
Lois, Zinavage, Baltic, CT
Carol, Spiegel, Chicago, IL
Laura, Riel, Madison, WI
Ann and Gene, Spake, MILL Valley, CA
Beth, Johnson, West Peoria, IL
Virginia, Hilker, Redondo Beach, CA
Richard, Ochs, Baltimore, MD
Christopher, Sewall, Phippsburg, ME
lani, baker, omaha, NE
Ani L., Schwartz, Arroyo Seco, NM
Jeremy, Berger, Baltimore, MD
Ann Catherine, Keims, Castro Valley, CA
Marilyn, Clare, northampton, MA
Peggy, Mallory, Shasta Lake, CA
jan, weeks RD LD, Evanston, IL
Dixie, Salazar, Fresno, CA
bill, womble, spokane, WA
FRONTINI, Jean Marie, ChazÃ© sur Argos FRANCE,
gilles, micheneau, la roche sur yon, ot
JOHN, Giancola, Columbia, MO
Robert, Lincoln, Rutland, VT
Ted, Ebert, Hot Springs, SD
Alim, Orova, Izmir, no
Anne, Edwardson, Madison, WI
Victoria, De La Cruz, Santa Fe, NM
Lorrie, Ogren, Santa Fe, NM
Rita, Sloan, Reno, NV
Ruth, Battaglia, Fond du Lac, WI
Thomas, Lanman, Glendale, CA
Andrew, Maxwell, Birch Bay, WA
Ruth, Battaglia, Fond du Lac, WI
Marjory, Donn, Greenbelt, MD
Elisavet, Skourtou, Thessaloniki, no
Chris, Tarnofsky, Bayonne, NJ
Dominique, Mazeaud, Santa Fe, NM
M, Baker, Bellaire, TX
Jennifer, James, Royal Oak, MI
Florence, Magnan, Monroe, WI
Larry, Irwin, Pasadena, CA
Joyce, Crowley, Morton, PA
jackie, mason, Kissimmee, FL
Jean, Angus, Punta Gorda, FL
Malissa, Haslam, Santa Fe, NM
Thais, Bradley, Pittsfield, MA
Malisa, Bradley, Pittsfield, MA
Walter L., Bradley Jr., Pittsfield, MA
Susan, Ebinger, Hillsboro, OR
Karen, Martellaro, Lenexa, KS
Edith, Martin, Punta Gorda, FL
Stanely, Parker, LaFollette, TN
Bonnie, Whitney, Santa Barbara, CA
stacey, landfield, warner springs, CA
Philip, Gilligan, Littleborough, ot
Laura, Knigge, Saint Louis, MO
Patricia, Cavanaugh, West Halifax, VT
Sidney, Ziring, Boca Raton, FL
Hank, Friedman, El Cerrito, CA

Jerry, Huffman, Dayton, OH
Scott, Belanger, Greenfield, MA
Jeffrey, Sturm, San Leandro, CA
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Robert, McFarlane, MD, Portland, OR
Peter, Herron, Cottage Grove, OR
Margaret, Koren, Windsor, CA
Anne, Askren, Athens, GA
Sara, Millard, Marion, OH
Micah, Parkin, Boulder, CO
David, Romain, Richmond, CA
Pauline, Devine, Littleborough, ot
dini, schut, toledo, OH
Javonne, Spitz, O'Fallon, MO
charlene, burke, ft. lauderdale, FL
Peggy, Porder, New York, NY
sandra, adair, boone, NC
Thomas, Eppes, Largo, FL
Robert, Travaline, Bridgeton, NJ
teddi, richman, brookline, MA
Rita, Sloan, Reno, NV
Stephen, Koermer, Lake Geneva, WI
Brendan, Hughes, Ridgecrest, CA
Caroline, Jacobsen, Minneapolis, MN
Elizabeth, Tomlinson, Pittsfield, MA
Doris, Loder, Philadelphia, PA
John, Fischer, Fort Worth, TX
Barbara, D'Erchia, Fort Collins, CO
Sandra, Couch, Naperville, IL
Annabel, Bradford, Chicopee, MA
Sandra S., Brown, Gill, MA
De Andre, Nickens, Barstow, CA
Lo, Auer, Columbia, MO
Brenda, Kameenui, Eugene, OR
Mark, Hull-Richter, Santa Ana, CA
Terrie, Williams, Vidor, TX
Dr.Dorothy K., Cinquemani, Largo, FL
Christina, Campbell, Vilas, NC
Lois, Zinavage, Baltic, CT
mary, pyne, saskatoon, SK
David, Hermanns, Staten Island, NY
Dr.Dorothy K., Cinquemani, Largo, FL
Maria, Brennecke, Sachse, TX
Joseph, Neiman, Jackson Hts., NY
Mark, Ervin, Hailey, ID
Peggy, Porder, New York, NY
Cathy, Robinson, Mobile, AL
Katina, Williams, Nashville, TN
Sunanda, Banerjee, Blue Bell, PA
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Leah, Karpen, Asheville, NC, NC
S, C, Brecksville, OH
Mara, Mitchell, Bellingham, WA
christine, weigand, Lake Ariel, PA
Kathleen, Sanders, San Diego, CA
Andrew, Zugay, Marlton, NJ
Lynn, Loflin, Brooklyn, NY
Diana, Hobden, Athens, OH
Emilie, Adams, St Johnsbury, VT
Karen, Culley, Fenton, MI
David, Hester, Easley, SC
Jackie, Cole, Asheville, NC
Margaret, Nagel, Evanston, IL
S., Chapek, San Francisco, CA
R., Zierikzee, San Francisco, CA
David, Kennell, University City, MO
Peggy, Reilly, Park Ridge, IL
jerald, richards, Ft. Thoams, KY
Pam, McDonald, Simsbury, CT
Karin, Tobin, Bloomfield, CT

Dian, Killian, Brooklyn, NY
Adam, Cooper, New York, NY
Katharine, Dodge, Lake Ariel, PA
Amanda, Robert, Buffalo, NY
Robert, Stang, Astoria, OR
Lois, Zinavage, Baltic, CT
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Chris, Robedee, Meriden, CT
Sharon, Stewart, Chacon, NM
Eric, Lane, San Antonio, TX
Anthony, Ilacy, manhattan, KS
Jill, Zamek, Arroyo Grande, CA
Julie, Larson, Ft Wayne, IN
Patricia, Chang, Indianapolis, IN
James, Roberts, Palouse, WA
David, Gascon, Lyndonville, VT
Mark, Intong, Lexington Park, MD
Ellen, Key, New York, NY
Isabelle, Rozendaal, Oberlin, OH
Russ, Rubin, Hid.Val.Lk., CA
Helen, Anderson, Portland, ME
Karene, Le Drian, Geneva, ot
Nan, Nelkin, Easthampton, MA
John, Bernard, South Portland, ME
Diana, Bunin-Fabian, Mayfield Hts., OH
Don, Brennecke, Bonham, TX
Thomas, Nahum, Founex, ot
Amy, Valens, Forest Knolls, CA
Darlene, Ceremello, Oakland, CA
Sara, Iujan, San Gabriel, CA
Celestia, Gaudreault, Arnold, MO
Sandra, Bettis, Middlesex, VT
Marie-JosÃ©, Escudero, Geneva, ot
sam, clauson, rapid city, SD
Jerry, Sparks, Bethany, OK
Manuela, Forno, Geneva, ot
Lavegnat, Adrien, Geneva, ot
Vuailat, Anne, Geneva, AZ
Betty, Cypser, Katonah, NY
Carolyn, Treadway, Normal, IL
Thomas, Blanton, Granite Falls, NC
Thomas, Blanton, Granite Falls, NC
Anne-Marie, StÃ©helin, Geneva, ot
Patricia, Brodsky, Prairie Village, KS
Andrew, Wastling, MANCHESTER [UK], ot
Mauro, Andreola, Geneva, ot
Susan, McLenaghan, McDonalds Corners, ON
Sue, Christiansen, Iowa City, IA
Susan, Pastore, Portland, ME
Jeff, Dearman, Winchester, MA
Joanna, Macy, Berkeley, CA
Virginia, Elliott, East Burke, VT
nicole, paul, charlotte, NC
jeanne, servis, Beverly Hills, MI
Janice, Quinter, Jackson Heights, NY
Mary Burton, Riseley, Cliff, NM
Ann, Brauer, Indian Springs, NV
Carl, Whitman, Simi Valley, CA
Dr.Dorothy K., Cinquemani, Largo, FL
William, Wilgus, Silver Springs, FL
Jeff, Dearman, Winchester, MA
Jean, Whelan, Saugerties, NY
Sarah, Maca, Larchmont, NY
Herbie, Robinson, Newton, MA
Anouk, Rufener, GenÃ©ve, ot
Anne, Whitfield, Durham, NC
Gretchen, Brewer, Roslindale, MA
Joan, Sage, Philadelphia, PA
Beverly, Stadick, Portland, OR
Julia, Hikory, Old Lyme, CT

Michael, Shields, Cocoa, FL
Michael, Shields, Cocoa, FL
Alice, Bartholomew, Elmira, NY
Anne, marvin, Hockessin, DE
john, Lambo, Monroe, CT
donna, clifton, perry hall, MD
Douglas, Gibson Jr, Fairfax, VA
Lana, Fishkin, Bala Cynwyd, PA
Mary, Heiderman, Timonium, MD
Florence, Magnan, Monroe, WI
Rich Runk; Woodridge IL 60517
Cheryl McKiernan; Sioux Falls SD 57103
Helenrose Rowan; Fairport Harbor, OH 44077
Dia Redman; St. Paul, MN 55109
Bonnie Kelcher-Bunn; Yucaipa, CA 92399
Ashwinee Sadanand; New Britain, CT 06053
Jim Thompson; Knox, PA 16232
Dr. E. Hegeman; New York, NY 10024
James Clemons; Aurora, IL 60506
Gary Gilardi
Kim Wyatt; South Lake Tahoe, CA 96155
Scott Edmonson; San Jose, CA 95130
Jeffrey Phillips; Ashland, MO 65010
Richard & Eileen Hening; North Massapequa, NY 11758
Robin Butler; Harrisburg, PA 17109
Robert Griffin; San Francisco, CA 94122
Laura Oesterhaus; Dwight, KS 66849
Glenn Campbell; Lakewood, OH 44107
Jan Salas Kentfield, CA 94904
Christine Snyder; Cheektowaga, NY 14225
Cameron Lambert; Berkley, MI 48072
Lesli Hogan; Moorpark, CA 93021
Judith Lachat; Bay Shore, NY 11706
Tracy Woods; Phoenix, AZ 85017
Claudine Clark; Chicago, IL 60660
Mark Messing; Traverse City, MI 49684
Nayeem Aslam; Carol Stream, IL 60188
Pam Scoville; Hewitt, NJ 07421
Isabel Sena; Jackson Heights, NY 11372
Elias Baron; Plano, TX 75093
David Roth; Arlington, VA 22204
Carol Duke; Williamsburg, MA 01096
Holly Tyson; Kennett Square, PA 19348
Frederick Goudy; Lebanon, PA 17042
Gustavo Sandoval; San Mateo, CA 94403
Kenneth Betser; Republic, MO 65738
Sarah Hafer; Sacramento, CA 95820
Bonnie Bean; New York, NY 10019
Kateri Kosek; Hopewell Jct., NY 12533
Jen Schnabel; Rochester, MN 55906
Jody Fritzke; Isanti, MN 55040
Jim Thomas; Chapel Hill, NC 27514
Larry Hovekamp; Louisville, KY 40218
Sylvia Barnard; Albany, NY 12210
James Sullivan; CHICAGO, IL 60630
Stephen Baker; York, PA 17402
Mary Cato; Arlington, TX 76012
Walter Lee IV; Altoona, PA 16602
Sandra Joos; Portland, OR 97239-7202
Wendy Sands; New York, NY 10014
Josephine Cieri; Brooklyn, NY 11204
Marc Daniel; Mount Vernon, WA 98273
Jeffrey Smith; Algonquin, IL 60102
A. Stone; Seattle, WA 98012
Edie Chernack; Vernon, CT 06066
Susie Davis; Pt. Richmond, CA 94801
Peter Caton; Loves Park, IL 61111
Catherine Carpenter; Cambridge, MA 02140
Melissa Daizell; Magalia, CA 95954

Dawnielle Voegele; Duluth, MN 55802
Frank R. Scott; Santa Ana, CA 92706
Barry Spielvogel; New York, NY 10075-1078
Eric Daniels; Clinton, IN 47842
Bill Fowlie; Harmony, ME 04942
David Eargle; Chattanooga, TN 37416
Christopher Kornmann; Bronx, NY 10469
Chuck Davis; Woodstock, NY 12498
Michael Smith; Dyersburg, TN 38024
Lewis Lipsitt; Providence, RI 02906
Jeffrey Erwin; Memphis TN 38111-7017
Mary Mihalik; McLean, VA 22101
Rik Masterson; Portland, OR 97211
Julio Berlinger; Littleton, CO 80123
Anthony Commarata; Akron, OH 44313
John Boesch; San Rafael, CA 94901
Bob Welsh; Salem, OR 97302
Paula Stone; San Antonio, TX 78209
Ronald Peterson; Stockton, CA 95207-4631
Glenn Diagon; Rockville, MD 20852
Michele Sanders; Minneapolis, MN 55407
Grant Whiteley; Baltimore, MD 21237
Gloriana Sewell; Milford Square, PA 18935
Gloria Picchetti; Chicago, IL 60657
Scott Jenkins; San Luis Obispo, CA 9340
M. Brianna Stallings; Albuquerque, NM 87106
Jeff Bower; Marlboro, VT 05344
David Flentge; Austin, TX 78745
George Yonge; Davis, CA 95618
Lori English; Raleigh, NC 27604
Boyer C. August; Hayward, CA 94541
Gary Patton; Santa Cruz, CA 95062
Mary Jones-Giampalo; Mauston, WI 53948
Bret Miller; Ashland, OR 97520
Yvette Raderman; New York, NY 10014
Dan Scarlett; Santa Rosa, CA 95409
Carol Collins; Dover, DE 19904
Robert Myers; Roswell, NM 88201-8603
Laurie Manis; Rock Island, IL 61201
T. Alex Shimada-Brand; Jamaica Plain, MA 02130
Theresa Jaquess; Huntington Beach, CA 92648
Kay Beams; Eden Prairie, MN 55347
John Lemmon; Nederland, CO 80466
Kevin Rolfes; Austin, TX 78737
Sholey Argani; Takoma park, MD 20912
Roger Smith; Belmont, CA 94002
Jeremy Kleier; Galloway, OH 43119
Luke Pickett; Williamsburg, VA 23187
Jessica Cresseveur; New Albany, IN 47150
Darla Barnshaw; Morton, PA 19070
Domingo Pina; Defiance, OH 43512-2415
William McCall; Arcadia, CA 91007
Pam Coe; Water Valley, MS 38965
Judith Hazleton; Bennington, VT 05201
Roxanne Warren; New York, NY 10025-1680
John Carter; Antioch, IL 60002
Maria Kelly; Albuquerque, NM 87104-1226
Breda Courtney; Berkeley, CA 94709
Diane Blackburn Spangler; Garland, TX 75044
Shawn Wozniak; Greensboro, NC 27403
Brian Longley; Grants Pass, OR 97526
Fred Steele; Brookline, MA 02446
Marilyn Yates; Erwin, TN 37650
Mary Rojeski; Santa Monica, CA 90405
Richard Coveny; Elfers, FL 34680
Elizabeth Ackman; Atlanta, GA 30342
Mark Reback; Los Angeles, CA 90034-5867
Patricia Ridgley; Napoleon, MI 49261
Stephen Donovan; Chicago, IL 60625-5107
Jan Stevenson; Stillwater, OK 74074-2504

Leslie Gold; New York, NY 10002-4900
Linda Tesser; Norwalk, CT 06851
Greta Calabrese; Tenafly, NJ 07670
Kirk Lumpkin; El Cerrito, CA 94530
Roberta E. Newman; Mill Valley, CA 94941-5080
Paul Statman; Santa Monica, CA 90405
Lucy McCrone; Chicago, IL 60616
Lori Blauwet; Rochester, MN 55901
Kay Beams; Eden Prairie, MN 55347
Lenore Chinn; San Francisco, CA 94117
Sienna Carter; Baltimore, MD 21234
Robert Scardapane; Somerset, NJ 08873
Vicki Price; Arlington, TX 76018
Daniel Lutzker; Garrison, NY 10524
B.E. Meadows; Livingston, TN 38570
J. Jackson; Santa Clara, CA 95050
Lynn C. Lang; Saint Cloud, MN 56303
Lance McKee; Worcester, MA 01603
Tim Duda; San Antonio, TX 78209-6625
Laura Marie Flynn; Landing, NJ 07850
Sarah Winblad; Chicago, IL 60607
Richard Falzone; Alliance, OH 44601
Josie Coogan; Gardiner, ME 04345-2125
Phil Kaplan; Soquel, CA 95073
Gloria Morotti; Bradenton, FL 34205
Carolyn Chandler; Strathmore, CA 93267
A. Lotsch; Southampton, NY 11968
George Loveday; Grass Valley, CA 95949
Dalal Salalme; Dearborn, MI 48126
Robert Gross; Burnsville, NC 28714
Donna Phillips; Winchester, VA 22602
Ann Thomas; Kendall Park, NJ 08824
Brian Boortz; Los Gatos, CA 95030
William Alkins; Atlantic, NJ 08401-7106
Kellie Smith; Deering, NH 03244
Ralph Hyde; Ripley, TN 38063
Linda Messner; Culver City, CA 90232
Thomas Diehl; Alexandria, NH 03222
Jennifer Boulden; Lewiston, CA 96052
Erik Schnabel; San Francisco, CA 94103
Lois White; Grants Pass, OR 97526-9748
William W. Wakefield; DeRuyter, NY 13052-0393
Fabian Herrera; Alameda, CA 94502
Peter Schumacher; San Francisco, CA 94122-2618
Josie Coogan; Gardiner, ME 04345-2125
Joel Scott; Dearborn, MI 48128
Chris Meredith; Sunnyvale, CA 94086
Helen Faller; Philadelphia, PA 19147
Carol Morrison; E. Dummerston, VT 05346
Maureen Primerano; Menlo Park, CA 94025
John Lewis; Elmhurst, IL 60126
Sarah McKee; Amherst, MA 01002-2825
Bobbie Monahan; Baltimore, MD 21201
Clyde Beardsley; Kalispell, MT 59901-5527
Nancy Hull; Grafton, OH 44044
Douglas McCormick; Coto, CA 92679
Patty Langford; Tatum, TX 75691
Petet Gunther; Chicago, IL 60625
Jennifer Wolff Wood; Bountiful, UT 84010
Illisa Kelman; New Haven, CT 06511
John Lynn; East Hampton, NY 11937
Jerre Miller; Willow Springs, MO 65793
Lawrence Crowley; Louisville, CO 80027
Andrew Jacobsen; Apache Junction, AZ 85220-5048
Carla Spencer; Waynesville, MO 65583
Shiu Hung; Menlo Park, CA 94025
Chris Casper; Madison, WI 53719-6240
Paul Burke; Virginia Beach, VA 23455
Dave Bruker; Westwood, CA 96137
Magoo Shoulderblade; Albuquerque, NM 87106

W. Dobroski; Chicago, IL 60657-6266
Beverly Nelmes; St. Petersburg, FL 33705
Don Grierson; Los Angeles, CA 90046
David Phelps; Greentown, IN 46936-9129
Donald Kosak; Menomonee Falls, WI 53051-5257
Suzanne McColl; Wilmington, NC 28403
Joseph Kopff; Goodyear, AZ 85395
Kenneth Bravehawk; Browns Summit, NC 27214
Peter Pitkin; San Mateo, CA 94402-3621
Daniel Wagoner; Boca Raton, FL 33428
G.G. Gibson; Houston, TX 77027
Woody Holland; Pittsburgh, PA 15221-4105
Gail McMullen; Los Angeles, CA 90027-3722
Catherine Miller; New York, NY 10025
Beverly Nelmes; St. Petersburg, FL 33705
Alice Slater; New York, NY 10028
Larry Madsen; Seattle, WA 98133
Solomon Namala; Culver City, CA 90230
Dorothy Gillberg; Rocky River, OH 44116
Jennifer Unger; York, PA 17404
Nancy Mills; Atlanta, GA 30319
Joan Bolduc; Elk Creek, VA 24326
Ronald Hughes; Hagerstown, MD 21742
Stuart Ross; Brockport, NY 14420
James Forte; Salisbury, MD 21801
Harold T. Hodes; Ithaca, NY 14850-3408
Fred Pomerantz; Sheffield, MA 01257
Jean Gramlich; Fenton, MI 48430
Larry Fleisher; Henderson, NV 89052
Judith Smith; Oakland, CA 94601
Ron Wildt; Morrisville, NC 27560
Liz Trojan; Portland, OR 97219
Andy Tomsy; San Diego, CA 92079
Randy Butler; New Orleans, LA 70119
Lancen Musser; Spokane, WA 99201
Terrence Ward; Midlothian, IL 60445
Lynn Cardiff; Salem, OR 97301
Gemma Geluz; Fairfield, CA 94533
John Gwazdosky; Augusta, ME 04330
Priscilla Carlson; Portland, OR 97211-6543
Cindy Walsh; Wilmington, MA 01887
Robin Lorentzen; Caldwell, ID 83607
Vicki Redditt; Indialantic, FL 32903
Laura Herndon; Burbank, CA 91506
Ernest Perez; San Jose, Costa Rica, 02150
John Moe; Long Beach, CA 908023351
Dan Cappello; Lawrence, PA 15055
Stephanie Lessard; Nashua, NH 03060
Ernest Paviour; Victor, NY 14564-8918
Michiko Wilson; Charlottesville, VA 22911
Carol Bayard; Maplewood, NJ 07040
Anne Berndt; Sharon, VT 05065
Callie Riley; Citrus Heights, CA 95610-2514
Karen Morris; Los Angeles, CA 90026
Cynthia Essig; Grand Rapids, MI 49534
Jessica Van Hook; Springfield, OH 45502
Charles Waugh; San Marcos, TX 78666
Lori Sherry; San Antonio, TX 78247
Paula Frizane; Mesa, AZ 85213-9602
Eva Landeo; New York, NY 10024
Ana Cruz; Valley Stream, NY 11580-3447
Fiona Nolan; San Rafael, CA 94903
Elaine Howes; Land O' Lakes, FL 34638
Karen Glauber; Vestal, NY 13850
Terrie C. Williams; Vidor, TX 77662-6311
Vicki Krushwitz; Waco, TX 76712
Chris McGinn; New York, NY 10025
Wanda Hargrove; West Hills, CA 91307
Helmy Membreno; PDX, OR 87212
Don Devine; Chester, NY 10918

Charles Shelton; Grottoes, VA 24441
Susan De Simone; Greenwich, CT 06831-4359
Jamey Aebersold; New Albany, IN 47151-1244
Shawn McConnell; Albany, NY 12208
Robert Hlavna; Elk Grove Village, IL 60007
Mark Walker; Albuquerque, NM 87111
Jim Sylva; Hansen, ID 83334
Julie Barrett; Newport, RI 02840
Roxanne Phillips; Chicago, IL 60626
Anna Karpathakis; Flushing, NY 11358
Daniel Romeo; Huntington, MA 01050
William Schmidt; Everett, WA 98205
Leslie Scott; Palmer, AK 99645
Bryan Cahill; Los Angeles, CA 90034
Susan Watts; Riverside, CA 92506
Nancy Szymczak; Carlsbad, CA 92009
Robin Lindberg; Crystal, MN 55422-1015
Andria Herron; Cloverdale, CA 95425
Penelope Carter; Rochester, NY 14607
June Maselli; New Haven, CT 06512
Paula Baker; Gilroy, CA 95020
Henry Rosenfeld; Riverside, CA 92506
Larry Bulling; Corvallis, OR 97330-2429
Maureen Primerano; Menlo Park, CO 94025
Mariu Suarez; Fort Worth, TX 76109
Phil Davis; Douglasville, GA 30135-1516
Sidney Ziring; Boca Raton, FL 33496
Nydia Leaf; New York, NY 10025-6718
Rev. Dave Bean; West Linn, OR 97068
John Simons; Grand Rapids, MI 49506
Nadia Hyppolite; Brooklyny, NY 11210
Robert Rickun; West Hollywood, CA 90069
Heather Schlaff; Chico, CA 95973
Joe Park; Portland, OR 97220
Lee Dimin; Albany, NY 12203-4145
Melody Lee; Kenner, LA 70065
Michael Teigen; Lantana, FL 33462-2907
Judy Treichel; Las Vegas, NV 89147
Marcus Sabom; Missouri City, TX 77459
Joan Seidel; Cottage Grove, OR 974243
Susan Linden; Palm Bay, FL 32907
Kathleen Birch; Strongsville, OH 44136
Erica Feliciano; Irvington, NJ 07111
Marcia Bailey; Blacksburg, VA 24060-6257
Patricia Broadwell; Roscoe, TX 79545
Leroy Frankel; Longmont, CO 80501
Ariel Anderson; Portland, OR 97206
Lisa Stone; Houston, TX 77096
D.J. Gardner; Sherman Oaks, CA 91411
P.A. Giuffrida; Arcadia, CA 91007
Robert Jenusaitis; Seattle, WA 98122
Nancy Nater; South Lake Tahoe, CO 96151
Stan Usowicz; Wharton, NJ 07885
Karen Stickney; Auburn, ME 04210
Karen Gray; Plainfield, IN 46168-9029
Jennifer Salome; Phoenix, AZ 85044
Marilyn Mayers; New York, NY 10128
Tom Delehanty; Socorro, NM 87801
Constance Kosuda; Las Vegas, NV 89122
Linda Carrillo; Prescott, AZ 86301
Nancy Wall; Tucson, AZ 85716
Mark Schaffer; Las Vegas, NV 89108
G.P. Franck-Weiby; Silverton, OR 97381
Kim Freeman; Santa Fe, NM 87505
John Gebhardt; New York, NY 10010
Nancy Widman; Baytown, TX 77520-8027
Jeanette Sherbondy; Chestertown, MD 21620
Corinne Di Stephan; Jamaica, NY 11435
Thomas Talmadge; El Cajon, CA 92021
Shari Katz; Westmont, IL 60559

Hannah King; Dallas, TX 75206-3529
Ed Miller; Albany, NY 12209
Patricia M. Beer; Warren, MI 48092
Ralph Litwin; Mendham, NJ 07945
Vivienne Pisanello; Albany, NY 12205
Patrick Moctezuma; Ruckersville, VA 22968
Marie-Elena Mello; Claremont, CA 91711-0968
Mark Lusch; Torrey, UT 84775
Leslie Tawnamaia; Cabot, VT 05647
Dick Gray; Montrose, CO 81401-9242
Cara Blumenthal; Baltimore, MD 21208
Ravi Grover; Chicago, IL 60680
Cathy Nieman; Weaverville, NC 28787
Marcia Hoodwin; Sarasota, FL 34238
Mark Samuel; San Francisco, CA 94121
Angela Black; Seal Beach, CA 90740
Brenda Sumblin; Atlanta, GA 30341
Carl Nylund; Grandview, MO 64030
Merlin Wilson; Salinas, CA 93907
John Simon; Sylvania, OH 43560
Harrison Richardson; Colstrip, MT 59323
Elizabeth Barrette; Charleston, IL 61920
Nina Jackson; Billings, MT 59101
Edna May Kumler; Duncannon, PA 17020
David Rousseau; Clarkston, WA 99403
Carolyn Miller; Perrysburg, OH 43551
Marla Rubin; Chicago, IL 60613
Paula Vincent-Cowan; Eastham, MA 02642
Gary Reese; San Clemente, CA 92673
Dana Molina; West Palm Beach, FL 33405
Calvin Rittenhosue; Columbus, OH 43228
Joan Runfola; Livingston, NJ 07039
Ana G. San Antonio-Belopopsky; New York, NY 10128
Joan Scocozza; Holiday, FL 34691
Elizabeth Enright; Scottsdale, AZ 85251-7006
Sheila Smith; Stoughton, MA 02072
Michael Franks; Reno, NV 89509
S. Waks; Hicksville, NY 11802
Lesley Stearns; Philadelphia, PA 19146
Mare Wahosi; Bremerton, WA 98312
Michael Tomczyszyn; San Francisco, CA 94118
Sharon Frank; Lewisville, TX 75067
Ira Marx; Sedona, AZ 86336
Peggy S. Collins; Southfield, MI 48075
Leonard DeDuke; Equinunk, PA 18417-3385
Lynda Mink; Dunedin, FL 34698
Elizabeth Romero; Tampa, FL 33605
Mark Johnson; Traverse City, MI 49696
Janice Rocke; Carmel, CA 93923
Martha and Richard Galaif; Pacific Palisades, CA 90272
Christopher Dougherty; Wanaque, NJ 07465
John Provancher; Portage, MI 49024-5021
Jean Owen; Joliet, IL 60431
Paula Troyano; New Orleans, LA 70119-5826
Sascha Bollag; Concord, NC 28025
Sidney Ramsden Scott; Carmel, CA 93921
Mark M. Giese; Racine, WI 53403
Marcia Lovelace; Oakland, CA 94610
Joseph Koeller; Madison, WI 53705
Wanda Hoots; Salter path, NC 28575
Shanna Cardea; Villa Park, IL 60181
Margaret Prescott; Koloa, HI 96756
Marvin George; Sierra Vista, AZ 85635
Mike Rudnick; Pittsford, NY 14534-4512
Kathleen Morris; Columbus, OH 43214-2107
Gene Imhoff; North Zulch, TX 77872
Virginia Stewart; Cumberland, MD 21502
Michael Ellegion; Scottsdale, AZ 85250
Christopher Luczkowiak; Wind Gap, PA 18091
Kerwin Schaefer; New Bern, NC 28560

Dan Brennan; East Rutherford, NJ 07073
L. Jane Swanson; San Luis Obispo, CA 93401
Fran Schneider; Teaneck, NJ 07666
Donald Barshis; Wilmetet, IL 60091-2216
K. Krupinski; Altadena, CA 91001
Andrew Tidwell; Seguin, TX 78155
Patricia O'Leary; College Park, MD 20740
Patrick Eaton; Bedford, TX 76021
Richard Lehman; Johnstown, PA 15905
Retha Dooley; Sauk Centre, MN 56378
Sue Cannon; Corona, CA 82881
Estelle Abrahamson; New York, NY 10025
Thomas Scott; Lake Arrowhead, CA 92352-2677
Twik Simms; Anaheim, CA 92801-1904
Brian Melton; Pocatello, ID 83204-4224
Al Cammisa; Monroe, NY 10950
Richard Davis; Tujunga, CA 91042
Gerry Milliken; Oroville, WA 98844
Shielding Courmoyer; Holyoke, MA 01040
Joseph Lite; Dayton, OH 45420-2444
Steve Anderson; Denver, CO 80221
Regina Gairo; Newtown, PA 18940
Ken and Mag Seaman; Denver, CO 80227-3426
Maria Rosen; Ambler, PA 19002-3735
Dassi McCurdy; Eugene, OR 97402
Jeffery Biss; Elgin, IL 60120
John Manos; Dunnellon, FL 34431
Jessica Barley; Tallahassee, FL 32303
Kristina Kuhn; La Crosse, WI 54601
Walt Terrell; Scarsdale, NY 10583
Jack David Marcus; New York City, NY 10025-7480
Susan Schluenderberg; Bel Air, MD 21014
Robert S. Lynch; Mahopac, NY 10541-0338
Louis D Putney; Tampa, FL 33629
Ruth Briggs; Trenton, MI 48183
Thomas V. V. Connor; Walkkill, NY 12589-3113
Frances Lynch; Duxbury, MA 02332
Dorothy Thompson; Fairbanks, AK 99708
Melva D. Tapia; Santa Ana, CA 92704
Robert N. Shorin; Syosset, NY 11791
Ian C Cree; San Francisco, CA 94110
John M Chrystal; Belhaven, NC 27810
John Miller; Kihei, HI 96753
Philip Williams; Indianapolis, IN 46203-5506
Jerry and Suzanne Marshall; Oregon City, OR 97045
Casey Dugan; Nashville, TN 37076
Lisa A Dodds; Sarasota, FL 34242
Dru Jackman; Whitefish, MT 59937
Monica Latka Black; Unicoi, TN 37692
Elena Kondracki; New York, NY 10025-8100
Evelyne A Axelrod; Pennington, NJ 08534
Ardith Arrington; Seattle, WA 98102
Tom Ferguson; Atlanta, GA 30312
Rob Ehmann; Merrick, NY 11566
Sybil Roberts; Riley, KS 66531
George Hasapidis; Cumberland, RI 02864
Nick Berezansky; Ridgewood, NJ 07450
Jean Crawford; Albuquerque, NM 87108
Albert Wassell; Larchmont, NY 10538
Sherlina Nageer; Brooklyn, NY 11216
Nanci Steeb; Rochester, NY 14610
Joseph S. Cox; Lake Forest, CA 92630
Paul Mitrani; Stony Brook, NY 11790
Geraldine Brylski; Lake Tomahawk, WI 54539
Nicholas Pierotti; Lawrence, KS 66044
Brian Gottejman; Los Alamitos, CA 90720
Kimberly Doster; Marietta, GA 30066
Herb Schulsinger; Valinda, CA 91744-3243
Sandra Lynn; Dripping Springs, TX 78620
Karen Woollams; Chelsea, MI 48118

Chrissie Johnson; Elgin, OK 73538
Linda Amar; Shelton, WA 98584
Robert Hogan; New York, NY 10024
Judith A. Graham; Morro Bay, CA 93442
Lynn Graham; Bellingham, WA 98225
Steve Dickman; Vestal, NY 13850
Dr. Anthony R. R. Peluso; Greenport, NY 11944
Stephen F. F. Kislock III; Beaver Falls, PA 15010-4033
Molly Perkins Hauck; Kensington, MD 20895-3812
Aliza Keddem; Portland, OR 97213
Amber Tidwell; Los Angeles, CA 90068
Theresa Lianzi; Hollywood, FL 33019
Chip Henneman; Salt Lake City, UT 84109
Mary McCormack; Alpharetta, GA 30004
Homer Ferguson; Mt Juliet, TN 37122
Lou Bernieri; Andover, MA 01810
Joyce Niksic; Hammond, IN 46323
Rose Montgomery; Lilliwaup, WA 98555-0202
Scott Rubel; Los Angeles, CA 90031-1633
Rebecca Anderson; New York, NY 10023
Christine Roane; Springfield, MA 01104-1829
Don Pratt; Lexington, KY 40502
Ann McMullen; Sandy, UT 84093
Silvia Rossi-Cortez; Jonesboro, GA 30236
Bonnie Oakes; Bowie, MD 20715
Martyn Phillips; Gilroy, CA 95020
Russell Miller; Phillipsburg, NJ 08865
Alice Slining; Rochester, NY 14625
Kathryn Sawyer; Oakland, CA 94611-1310
Lucy Schneid; Portland, OR 97213
George Tolleson; Asheville, NC 28805-1713
Ricki Newman; Newburgh, IN 47630
Marina Diehl; Portland, OR 97206
Roger Matthews; Ada, MI 49301
Frank Arnold; San Jose, CA 95127-4201
Michael Molder; Newberry, SC 29108
Imogen Taylor; Ann Arbor, MI 48103
Walter Horton; Stanley, NC 28164
Jean Bails; St. Clair Shores, MI 48081
Alan Wojtalik; Baltimore, MD 21234
Brian Lynch; Waterville, ME 04901
Nancy & Ken Macy; Boulder Creek, CA 95006
Catherine Falknor; Purcellville, VA 20132
Carl Zimmerman; Las Vegas, NV 89122-7583
Eleanor Beram; Cambridge, MA 02139
Julie Zimmerman; Las Vegas, NV 89122-7583
Richard D'Arcangelo; Tucson, AZ 85730
Edward Bender; Rochester, NY 14620
Charles Denson; Springfield, OR 97477
Kay Peters; Las Vegas, NV 89122-7583
Sterling Showers; York, PA 17404
Mike Cofer; Hudson, IL 61748
Jc Dufresne; Cibolo, TX 78108-4273
James Hopkins; Whitewater, WI 53190
Edmund Levering; Fort Collins, CO 80524
Brian Cummings; Milwaukee, WI 53207
Annette R Nolan; Waupaca, WI 54981
Anthony Mann; Sedro Woolley, WA 98284
Dana Chapeskie; Ottawa, ON K1S 1X5
Shannon Ebejer; Bay Village, OH 44140
Steven G. G Kellman; San Antonio, TX 78231-1519
Ted Fishman; San Jose, CA 95123
David Melvin; Chester, NJ 07930
Melissa Harris; Nashville, TN 3721
Diane McKenna; Stratford, CT 06614
Joy Augenstern; Hull, MA 02045
Laurel Watson; Maricopa, AZ 85238
Kimberly Seger; Kittanning, PA 16201
Christine Livingston; Greenleaf, KS 66943
Harriet Hirsch; Vienna, VA 22182

Cindy Torrey; Fort Lee, VA 23801
JoAnn Bradley; Creston, IA 50801
Shirley Goldsmith; Cedar Hill, TX 75104/4236
Douglas McNeill; Greenbelt, MD 20770-0718
Frances Saykaly; New York City, NY 10021
Karen Stone; Laguna Hills, CA 92653 1849
Gary Neu; Roscoe, IL 61073-9674
Susan Burnett; Portland, OR 97223
Sandra Holt; Casselberry, FL 92707
Rachel Herbener; Oak Park, IL 60304
Adele Kushner; Alto, GA 30510
Jared Cornelia; Wilmington, DE 19804
Gloria FISHER; Hendersonville, TN 37075
Barbara Gerten; South St Paul, MS 55075-1831
Donna Plutschuck; Lakewood, CO 80226
Alex Won; San Francisco, CA 94104
Susan Evilsizer; Cleveland, OH 44130-2489
Regina Cappelletti; Canton, MI 48188
Fred Winn; Placerville, CA 95667
Peter Bedard; Los Angeles, CA 90029
Alexis Abrams; Los Angeles, CA 90031
Christopher Day; Branchville, NJ 07826
Raffael Trimmel; Klostermarienberg, ot 7444
Doris Murphy; Myrtle Beach, SC 29577-2631
Matthew Dunn; san diego, CA 92107
Daniel P Schlosky; Los Angeles, CA 90064
John Seibert; Columbus, OH 43209
Eric Lehman; New York, NY 10003
Daniel Reschke; York, PA 17401
Earl Shumaker; Sycamore, IL 60178
Christine Livingston; Greenleaf, KS 66943
Bonnie McCune; Miami, FL 33143
Kleomichele Leeds; Austin, TX 78759
Kate Ravenstein; SAHUARITA, AZ 85629
Robert Resnik; Bethesda, MD 20817-3716
John Gomolka; Brunswick Hills, OH 44212-4143
Philip Johnston; Scotts Valley, CA 95066
Mary Robbins Jones; Richardson, TX 75081
Cynthia & James Enlow; Albany, OR 97321
Bobbie Nagel; Millburn, NJ 07041
Eric Morse; West Des Moines, IA 50265
Barbara Besold; Fair Lawn, NJ 07410
Jessica K Helterman; Morristown, NJ 07960-5340
Robert W Kalayjian; Long Beach, CA 90803
John Grunwell; Downingtown, PA 19335
Jessica Letscher; Downingtown, PA 19335
Pat and John Beam; 9262 Pigeonwing Place, 21045-
Patricia Sorrell; Waukesha, WI 53188
Stephanie Pacheco; fountain valley, CA 92708
Sonja Manning; Memphis, TN 38112
Luce Gauthier; Los Angeles, CA 90016
Annapoorne Colangelo; Clinton, WA 98236
Bonnie Jean Brown; Morgantown, WV 26505-5276
Douglas Kinney; Otego, NY 13825
Curt Herman; Coldwater, MI 49036
Barbara Robbin; Studio City, CA 91604
Bob Delaney; St. Louis, MO 63129-1703
Marthe Reed; Lafayette, LA 70503
James Bush; Saginaw, MI 48601
Lorne Beatty; Brighton, MI 48114
Suzy C; MN 55033
Paul Best; Forestville, CA 95436
Judy Haggard; Fieldbrook, CA 95519
Sage River; Iowa City, IA 52245
Ronnie K Endre; Orleans, MI 48865
Jackie Hoke; Denver, CO 80210
Judith Ackerman; New York, NY 10024
Will Penn; Weston, FL 33326
Mary Clark; Roseville, CA 95661
Donald Diedrick; Carol Stream, IL 60188

Linda Griffith; Dixon, NM 87527
Illard S Garwood; Bellaire, FL 33756
Paul Jerome; El Paso, TX 79924
Jean Cartmill; St. Louis, MO 63122
Roberta Schonemann; West Lafayette, IN 47906
J. Capozzelli; New York, NY 10024
Abdur-Rahim Rasheed; Toms River, NJ 08755
Elizabeth Enright; Scottsdale, AZ 85251-7006
Barbara Fitzpatrick; Fayetteville, AR 72703
Mary Detrick; St. Petersburg, FL 33710
Lisa Gosnell; Georgetown, DE 19947
Barbara and Jim Dale; Decorah, IA 52101-1653
Alexandra O'Neill; Wynnewood, PA 19096
T. Metreger; Pinckney, MI 48169
Daniel Belachew; Cambridge, MA 02139
Raymond Swierczynski; Suffern, NY 10901
Chrissantha Cramer; Billings, MT 59101
Joe Vissichelli; Valley Stream, NY 11581-1423
Edward Bielaus; Rockville, MD 20852
Mary Fuller; Rochester, NY 14612
Lois Braun; St. Paul, MN 55108
Shirley Sykes; Sacramento, CA 95831-3992
Peter Zupan; Monument, CO 80132
Karen Arhart; Northwood, IA 50459
Kenneth Hayes; Austin, TX 78704-1343
James Kirks; Chico, CA 95973
Judy Allen; Putnam Valley, NY 10579
Robert Simpson Sr.; Taneytown, MD 21787
Aaron Ucko; Washington, DC 20036-6025
Carol Stark; Lockport, IL 60441
Doris Zumpe; Decatur, GA 30033-4227
Tim Gabbert; Williamsburg, VA 23188
Lee Davis; Portland, OR 97223
Eric Bottomly; Magdalena, NM 87825
Carol Laitinen; St. Louis, MO 63114
Stanley L. L Swart; Jacksonville, FL 322575412
James Mays; Churchville, PA 18966-1366
Donald Wilson; Philadelphia, PA 19111-3811
Deb Fritzier; Amherst, VA 24521
Julia O'Neal; Perkinston, MS 39573
Martin Ruther; Columbia, MD 21044-1718
Charles Dcaglione; New Paltz, NY 12561
Patricia Dishman; Nashville, TN 37221
Terri Vidal; Pasadena, TX 77502
Ken Bossong; Takoma Park, MD 20912
Fred Sokolow; Santa Monica, CA 90405
Shirley Mitchell; Harrisonburg, VA 22802
David Nelson; North Brookfield, MA 01535
Michael Kauffman; Greenwood, IN 46143-2608
Sara Ewen; Eagle, ID 83616-6818
John Kitchens; Cedar Park, TX 78613
Ryan Nellis; Los Angeles, CA 90019
Cyndy Huntington; Castle Rock, WA 98611-8701
Miriam Sagaser; Placerville, CA 95667
Annette Messina; Lombard, IL 60148
Chuck Rohrer; Seattle, WA 98102-5061
Dinkar Kasbekar; Raleigh, NC 27613/6190
Rachel Sonnenblick; Santa Cruz, CA 95062
Bill Leikam; Palo Alto, CA 94306
John Marchese; Henderson, NV 89014-3139
Salvatore Casano; Albany, NY 12211-2630
Jane Chischilly; Bisbee, AZ 85603
Francoise LaMonica; Newton, MA 02459
Yvonne Hansen; Austin, TX 78745
Eric Newman; Bronx, NY 10475
Harmer/Magdalena M. Weichel; Cherokee, NC 28719
Cynthia Gilman; Narberth, PA 19072
Glenn Krick; Reading, PA 19606
Ray DiZefalo; Melbourne Beach, FL 32951-3479
Susan Babbitt; Philadelphia, PA 19107

Loretta M. Bober; Brightwaters, NY 11718
Ronald Bogin; El Cerrito, CA 94530
E.S. Schloss; New York, NY 10128-3768
Sue Gray Gray Al-Salam; Newport News, VA 23601-3301
Susan Maxwell; Broomfield, CO 80020
Kathy McClure; St Charles, MO 63304-7485
Robert Keiter; Drexel Hill, PA 19026
Vivian Dean; Courtenay, BC v9n 8a2
Dean Johnson; Spring Valley, CA 91977
Jean Keller; Lakewood, OH 44107
Joyce Hammack; Fort Worth, TX 76132 4023
Dot Sulock; Asheville, NC 28804
Ann and Stanley Sprayregen/Sperber; NYC, NY 10033-
Diane Crummiett; soap lake, WA 98851
Kevin O'Connor; Davis, CA 95616
Diana Smith; Tomahawk, WI 54487
Violet Chen; Richmond, TX 77469
Joseph Belisle; South Hadley, MA 01075-2133
Toni Lubofsky; Rancho Palos Verdes, CA 90275-3007
Jon McFartane; Queens Village, NY 11429-1634
Melissa Miller; concord, CA 94520
Ellen Hecht; Albany, CA 94706
Elizabeth Hubler; Wyoming, MI 49548
Britton Saunders; Milwaukee, WI 53207
Jennifer Beard; Buffalo, NY 14216
Vernetta Mullins; Tampa, FL 33625
Christopher Mason; Cincinnati, OH 45255
Terri Weiss; Van Nuys, CA 91405
Pat Dressler; Hanford, CA 93230
Jean Thorsen; New London, CT 06320-4707
Sunday Waldon; Marquette, MI 49855
Mitchell Donian; New York, NY 10014
Joyce Palaia; Avila Beach, CA 93424
Terry Stick; Pinellas Park, FL 33781
Allan Henson; Baltimore, MD 21208
John Anuci; White Cloud, MI 49349
Lucy Horwitz; LA, CA 90049
Julia Villars; Bath, MI 48808
Chris Avery; Novato, CA 94947-3009
Zelma S. Taylor; Petersburg, VA 23803
Stephen Melott; Raleigh, NC 27613
Richard Rouse; Park Ridge, IL 60068
JOANNE Nagy; Granada Hills, CA 91344-3730
Henriette Groot; Cayucos, CA 93430-1528
Helene B Tekulsky; New York, NY 10021
Todd Lehman; Cottonwood Heights, UT 84121
Edward Steinman; Ann Arbor, MI 48103
Tiziano Bianchi; Dallas, TX 75252-5687
John Williams; Westport, CT 06880
Liz Fein; Brooklyn, NY 11201
Elizabeth Apfelberg; San Luis Obispo, CA 93401
Bruce & Laurel Cox; Marietta, GA 30066
Andrew Froehle; Brownville, MN 56438
Esther Lee; Braintree, MA 02184
Rick Wagner; Sedona, AZ 86336
Henry Peters; Ewen, MI 49925
William Rogers RN (Ret.); Selah, WA 98942
Joan Hackel; Wetumpka, AL 36093
Jenifer Massey; San Clemente, CA 92672
Cher Gilmore; Newhall, CA 91321
Aaron Chan; Alexandria, VA 22304
Andrew Yeager; McCook, NE 69001
Nancy Stanley' Raleigh, NC 27606
Virginia Harden; Middletown, PA 17057
Ted Kozlowski; Portland, OR 97219
Kathryn Plitt; Gig Harbor, WA 98332
Janet Williams; Santa Fe, NM 87505
Ann Hofbauer; Sayville, NY 11782
Mr.. & Mrs. Bruce Revesz; Cedar Grove, NJ 07009

Dorothy Salant; Mill Valley, CA 94941
Victoria Guzzardo; Santa Fe, NM 87507
Thomas Tague; Burien, WA 98148
Shirley Crenshaw; St. Louis, MO 63146-4972
Kristin Fenn; Berkeley, CA 94709
Shayna Glick; Clarkston, GA 30021
Rev. Jeffrey Womble; Lodi, CA 95240
David Gascon; Lyndonville, VT 05851
Lorraine Brown; New York, NY 10956
Elsy Shallman; Loxahatchee, FL 33470
William McMullin; Mt. Morris, MI 48458
Patricia Haverkamp; Gainesville, TX 76240-5430
Sandra J Mardigian; Mill Valley, CA 94941-2618
Elizabeth Rotter; San Francisco, CA 94117
Betsy L. Angert; Boca Raton, FL 33433
Aaron McGee; Madison, WI 53704
Carolyn Greer; Broxton, GA 31519-6416
David J. J. Lafond; Holyoke, MA 01040-3502
Ray & Betty Morris; Bakersfield, CA 93308
Jacquie Lowell; San Diego, CA 921175338
Richard David; Temecula, CA 92591
Christopher Patton; Lexington, MA 02421
Lynn Feinerman; CA 94942
Philip Simon; San Rafael, CA 94912
Betsy Brotman; Berkeley Heights, NJ 07922
Mitch Labuda; Toledo, OH 43608
Ken Cooper; Walnut Creek, CA 94598
Judith Gleitsman; Olympia Fields, IL 60461
Ralph Bocchetti; Arcadia, CA 91007
Millison Brace; Sarasota, FL 34243
Steven Smith; Centerville, UT 84014-1181
Lewis Kuhlman; Minneapolis, MN 55405
Marilyn Melcher; Bothell, WA 98011
Darryl Warner; Rockaway Beach, NY 11693-1498
Damien Landini; Neuilly-S-M, ot France
Simon Codianni; Albuquerque, NM 87108
Julie Pin; Batavia, IL 60510
Linda Seeley; San Luis Obispo, CA 93405
Edward Stewart; Zimmerman, MN 55398-9429
Linda Olson; Murchison, TX 75778
Chantal Bacon; New York, NY 10011
William Rees; Westland, MI 48186
Ana Maria Obrist; Concepcion, ot 4070359
Judith Lotz; Burbank, CA 91505
Alice Dugar; Independence, OH 44131
Allene Nicholoff; Valley Glen, CA 91401
Hollis Jones; Cody, WY 82414
H. Marie Ostrander; Fairview, NC 28730-9535
Sally Blaisdell; Albuquerque, NM 87107
Lindea Kirschner; Ashland, OR 97520
Ken Burke; Oakland, CA 94613
Thomas Lindsey Hooppaw; Chicago, IL 60626-3556
Anthony Aviles; Forest Hills, NY 11375-5471
David Miller; Huntsville, AR 72740
Lessye Joy DeMoss; Manor, TX 78653-9709
Alan Stout; Evanston, IL 60201
Betty Combs; Londonderry, OH 45647
Linda Ricks; Beaufort, NC 28516
Christine Stahl; Eugene, OR 97405-3215
Ronald B. Everitt; Angola, IN 46703
Marcella Hammond; San Diego, CA 92104
Rose Lernberg; El Cerrito, CA 94530
Caroline Byerly; Modesto, CA 95350
David Young; Seattle, WA 98101
Jennifer Willis; San Francisco, CA 94117
Bro. John Mahoney; Baltimore, MD 21229-4423
Jennifer Thomson; Somerville, MA 02143
Patrick Lavery; New Fairfield, CT 06812
Bret Polish; Sherman oaks, CA 91403
Ben Margolis; Gaithersburg, MD 20878

Reba Stone; St. Simons Island, GA 31522
Alan J. Eisenberg; Brooklyn, NY 11215
Elizabeth Dodd; Boca Raton, FL 33498
Scott Korman; Great Neck, NY 11021
Kathryn Starring-Rogers; Ripon, CA 95366
Robert & Phyllis Papenberg; Grants Pass, OR 97526
Karen Ausfahi; Littleton, CO 80123
Maria L Wyatt; Long Beach, CA 90803
Pam & Robert Burns-Clair & Clair; Sonoma, CA 95476
Sherry Schnebel; Piedmont, AL 36272
John Schumacher; Clearwater, FL 33757
Stan Bozek; Boston, MA 02114-2594
Kevin Smith; Turners Falls, MA 01376-1407
Marcia Halpern; Palm Beach Gardens, FL 33410-4471
Harriet McCleary; Minneapolis, MN 55404
Ken and Donna Bubb; Spokane, WA 99217
Lina Russo; Quincy, MA 02169
Margaret Tommaso; Douglaston, NY 11362-1042
Alison Moski; Durham, CT 06422
Rudolph Ripp; Staten Island, NY 10301
Paul & Lynn Alexander; New Smyrna Beach, FL 32168
Frank Kolwicz; Monmouth, OR 97361
Susan Christopher; Newport Beach, CA 92660
Ann Asnes; Watertown, MA 02472
Daniel J. Sanchez, Sr.; Crossville, TN 38572
Elenara Joubert; Montpelier, VT 05602
Trent Block; Incline Village, NV 89450
Leslie Stroebel; Rochester, NY 14626
Lisa Hubbell; Berkeley, CA 94703
Jo-Ann Moore; Lansdale, PA 19446
Walter Graue; Lynn Haven, FL 32444-5603
Fred Colman; Arbor Vitae, WI 54568
Judy Faraklas; Downingtown, PA 19335
Janalyn K Lynne; Prescott, AZ 86301
Tamie Pryor; Oswego, IL 60543
Bob Clark; St Joseph, MI 49085
Anne Sherwood; Kansas City, MO 64113
Neil Freson; Henrietta, NY 14467
Donna Clark; St Joseph, MI 49085
Bert D. Greenberg; San Jose, CA 95135
Dustin Collings; Seattle, WA 98105
Kristina Rodby; Hopkins, MN 55343
Paul Netusil; Old Tappan, NJ 07675-7237
Robert Hamilton; San Diego, CA 92117-4175
Anne DeMers; Crookston, MN 56716
Lea MacLeod; Amherst, NY 14226
Robin McGrane; Carterville, MO 64835
Kim Koenig; Grand Junction, MI 49056
Robert and Helen Buttell; Philadelphia, PA 19147
Relf Star; Claremont, CA 91711
John Strauss; New Haven, CT 06515
Peter Leon; Arivaca, AZ 85601
Donna Greenwell; Saratoga Springs, NY 12866
Gwendolyn Richards; Santa Barbara, CA 93101-1568
Mary Boudreaux; San Bruno, CA 94066
Patti Constantino-martin; Spring Hill, FL 34610
David Seebert; Henrietta 14467
Karl Knutsen; Minneapolis, MN 55406-0385
John Strauss; W. Haven, CT 06515
John Doyle; New York, NY 10014
Patricia Zenn Caalaman; San Diego, CA 92109
Melissa Marote; Northridge, CA 91325
Lanlan Hoo; Wheaton, IL 60189
Ellen Bryant; Eureka, CA 95503-5463
Cyndi Thompson; Wellsboro, PA 16901
Lisa Freeman; Elkhorn, WI 53121
James Jacobs; Cincinnati, OH 45230
Lynne and Greg Lokken; Edina, MN 55424
Kendall Barber; Warren, VT 05674
H. Maaser; Monmouth Junction, NJ 08852

Robert Cote; Kankakee, IL 60901
David Gustafson; Moline, IL 61265
Shell Lavender; Snowflake, AZ 85937/5701
Pearl Deatherage; Glendale, AZ 85301-5033
Jason Schmidt; Kansas City, MO 64155-3533
Michele Smith; Brooklyn, NY 11217
Steven Conry; Ainsworth, IA 52201
Jon Hager; Riverton, UT 84065
Rena Lewis; Ojai, CA 93023
Douglas Estes; San Francisco, CA 94118
Richard Dilley; W. Lafayette, IN 47906-9602
Elaine Fischer; Houston, TX 77054-4196
Lorraine Cohen; Maple Shade, NJ 08052
Nancy Ranieri; Dresher, PA 19025-1235
Scott Zorc; Buford, GA 30518-6510
Elizabeth Anderson; Fort Lauderdale, FL 33338-4175
Richard Bachman; Friendswood, TX 77546
Estelle Voeller; Medford, OR 97501
Dan Brown; Bluefield, WV 24701
Christopher Boyer; Denver, CO 80212
Cristina Abad; Los Angeles, CA 90068
Barbara van Davis; Aurora, IL 60506-5051
Betty R Lewis; Santa Barbara, CA 93105-3349
Penny LaDeur; Floyd, VA 24091
Suzan Myers; Aurora, CO 80010
Rob H Campbell; Memphis, TN 38111
Frank Bartell; Philadelphia, PA 19123-1404
Albert Nunez; Takoma Park, MD 20912
Colleen Robinson; Madison, WI 53713-1207
Richard Culp; Cuyahoga Falls, OH 44221-5014
Dean Farris; Belton, MO 64012
Ruth K. Panella; Wilmington, DE 19810
Megan Faber; Denver, CO 80210
Ameer Sanghvi; Anaheim, CA 9280
Betty Whitmer; Vancouver, WA 98662-4451
Jerilyn Bodemar; Watsonville, CA 95076-3236
Stuart Skadden; Hurley, NM 88043
James Smith; Watsonville, CA 95076
Barbara Jurgens; Kirkland, WA 98033-8345
Jerrill M Schrag; Wichita, KS 67212
Jeff McGrath; Seattle, WA 98144
Lawrence Camp; Morganton, NC 28655
James Hibbard; Falmouth, MA 02540
Anita K Wassermann; Stamford, CT 06902
Joanna Bonnheim; Wichita Falls, TX 76301
Barbara Klemm; Lynchburg, VA 24503
Carol Hollomon; Collierville, TN 38017
Harold Carlson; Ramsey, NJ 07446
Wayne B. Peters; Greenfield, WI 53220-3428
Bryan Brunner; Maricao, PR 00606
Barbara Roth; Warren, MI 48089
S. Lightner; Tucson, AZ 85705
Jeaneane Williams; Greensboro, NC 27410
Marcia Cohen; Hastings-on-Hudson, NY 10706-2904
Jack Cox; Portland, OR 97202-1615
Joan Sadowski; Wilmington, MA 01887-2224
Leslee Doner; Boise, ID 83709
Dr. Mara Beckett; Glendale, CA 91207
Bruce Cohen; Worcester, MA 01602-2823
Marjorie Vangsness; Grand Rapids, MI 49503-3811
Jonathan Ertelt; Nashville, TN 37212-4808
Zeda Lockley; Baltimore, MD 21229
Margery Coffey; Rosalie, NE 68055-0279
Thomas R Goforth; Chicago, IL 60657-4330
Kristen Reutlinger; Philadelphia, PA 19111
Tom Kunhardt; Corte Madera, CA 94925-1081
Dave Brast; Inverness, CA 94937
Suzanne Schaem; New York, NY 10150
Olga Zharkova; Edmonds, WA 98026
Yvonne Floyd; San Luis Obispo, CA 93405

Mae Martinec; Oak Forest, IL 60452-2023
Cathleen Carlson; Torrance, CA 90504
Marilyn Brunger; Claremont, CA 91711-4256
Vivian Valtri; Granville, VT 05747-9604
Joel H Levitt; Brooklyn, NY 11235
Frances Allen; Fort Worth, TX 76133
Benzi Kluger; Denver, CO 80205
Helga M Muladore; Worthington, OH 43085
Barbara Cowan; Cambridge, MA 02138-3203
Gus Tombros; Arlington, WA 98223-7686
Wendy Oser; Berkeley, CA 94702-1027
Donna Clark; Alhambra, CA 91803
Ameen Abdulkareem; Norwalk, CT 06851
Patricia Barkley; Wichita, KS 67217
Daniel C. Green; Carmel, CA 93921
Bonnie Faith-Smith; Cambridge, MA 02139
John M McIntosh; Portland, OR 97221
Sarah Perez; Torrance, CA 90501
Lisa Seal; Orlando, FL 32829
Donald Walsh; Alexandria, VA 22314
Ed Herndon; Riverview, FL 33579-6845
Evalyn Segal; Philadelphia, PA 19119
James E Kunz; New Bern, NC 28560
Donna Bonetti; Boulder, CO 80303
Patricia A. Hubley; N. Chelmsford, MA 01863
Phil Hughes; Salisbury, MA 01952
Nancy Cashman; Chesapeake, VA 23322
Iris Ciabattari; Fayetteville, AR 72703
Martin Ansell; West Hollywood, CA 90069
Karri Watson; Corryton, TN 37721
Dolores Zaremba; Oakland Park, FL 33308
Linda Bescrypt; Tucson, AZ 85747
Tom Perkins; Smiley, TX 78159
John McRae; Dallas, TX 75240
Phil Hanson; Portland, OR 97202
Anton Camarota; Prescott Valley, AZ 86315
Signe and Joe Stuart; Santa Fe, NM 87508
Janice Gloe; Oakland, CA 94602
Joan Poss; Fresno, CA 93704-4143
Jo Ingman; Fenton, MI 48430
Kathy Chan; Chicago, IL 60642
Dana Wullenwaber; Redding, CA 96001
Randy Sailer; Beulah, ND 58523
Robert Heron; Los Angeles, CA 90064-4060
Dr. D Fassman; Westbury, NY 11590
Dawnielle Castledine; Austin, TX 78704
Carole January Erickson; Carmel, CA 93923
Julio Rodriguez-Luis; Bay Harbor Islands, FL 33154
Rachel Wolf; Santa Cruz, CA 95060-2244
Ian Thomas; South Royalton, VT 05068
Franklin Eventoff; Bow, WA 98232
Andrea Pike; Bow, WA 98232
Dorothy Stover; Cincinnati, OH 45231
Elinore Krell; Baltimore, MD 21218
Denise Brennan; Auburn Hills, MI 48326
Esther Leonard; Huntington, WV 25705
Richard Harlos; Mesa, AZ 85210
John Mead; Santa Cruz, CA 95060
Allie Baurer; Jenkintown, PA 19046
John Robertson; Blacksburg, VA 24060
Jill Ransom; Reno, NV 89509
Kathleen Crittenden; Viroqua, WI 54665
Robin McKay; Louisville, KY 40228
Dennis Paradee; Franklin, IL 62638
Mary Blom; Sebastopol, CA 95472
Ransom Stone; El Paso, TX 79912-7213
Mae Yanowitz; Brooklyn, NY 11218
Francis Chisholm; East Lyme, CT 06333
Gary Scholton; Durango, CO 81301
Louise L Sherman; Leonia, NJ 07605

Liz De Witt; Tulsa, OK 74133
Jaimi Haig; Salt Lake City, UT 84102
Frank Hajcak; Orlando, FL 32837
Kelley Scanlon; Syracuse, NY 13206
Denise Morey; Taftville, CT 06380
Cathy Bilsky; Honokaa, HI 96727
Kerby Miller; Columbia, MO 65203
Bill McAfee; Austin, TX 78746-5630
Todd Feiler; Cazadero, CA 95421
G. Hande; West Haven, CT 06516
Warren G. G. Jones; Grafton, WV 26354-1827
Jeff Carpenter; Fall River, MA 02723
Hyman Freilich; Boca Raton, FL 33433-1823
Marilyn A. Waltast; Oro Valley, AZ 85755
Barbara Arlen; Corvallis, OR 97333-2233
Peggy Walto; Conroe, TX 77301
Mary Alexander; Glen Allen, VA 23060
Marilyn Britton; Peterborough, NH 03458
Marge Carnahan; Galion, OH 44833
Carol Newton; Los Angeles, CA 90027-3010
Chris Zima; Aurora, IL 60502
Alexander Pappas; Berkeley, CA 94705
Tina Wall; Greenville, OH 45331
Emily Wallace; Bethlehem, PA 1801
<jonspitz@xprs.net>
Chris Saia; Astoria, NY 11105
Nancy Kramer; San Francisco, CA 94117
Sister Mary Fran Gebhard; Eau Claire, WI 54701
Marcia Robinson; New York, NY 10010-6632
Mary R. Wolfe; Lutherville, MD 21093
Romeo M Flores; Corpus Christi, TX 78478
Paula Cox; Arlington, TX 76017
Oskar & Mathias Obrist; Concepcion, ot 4070359
Ken Weiss; New Rochelle, NY 10804
Kathy L Kroll; Stroudsburg, PA 18360
Rosalind Zitner; Great Neck, NY 11020
Susan Byers Paxson; Dorchester, MA 02125-2048
James Gilland; Tucson, AZ 85712
Deborah Murphy; Hayden, ID 83835
Sam Marshall; Milledgeville, GA 31061
Shirley Espeland; St. Paul, MN 55108
Stephen Sleeper; Bonita Springs, FL 34135
Mary Jean J Waller; Chicago, IL 60647
Walter Schwarz; Brattleboro, VT 05301
David Walker; Avondale, AZ 85392
Andrei Smarandoiu; Somerville, MA 02143
Carmen Druke; Houston, TX 77008
Nancy S. S. Lovejoy; Wilbraham, MA 01095-0158
Susan M. Selbin; Albuquerque, NM 87104
Bud McAllister; Lyme, CT 06371
Rochelle Hartson; Los Angeles, CA 90039
Louise L Sherman; Leonia, NJ 07605
Donald L Foley; Florissant, MO 63034
Joan Sitomer; Ypsilanti, MI 48197
Laura Wertenberger; Kentwood, MI 49548
Brad Miller; Floyd, VA 24091
Sarah Chamma; Moorhead, MN 56563-0001
Daniel Vice; Bethesda, MD 20814
Jodi Swanson; Ridgefield, WA 98642
Ruth Levow; West Palm Beach, FL 33411
Melissa Conrad; South Jordan, UT 84095
Julia Penn; Austin, TX 78705-2117
Amber Sumrall; Soquel, CA 95073
Fidel Jaramillo; Englewood, CO 80113
Penny Derleth; Deer Park, WA 99006
Sister Stephanie Mertens, ASC; Red Bud, IL 62278-2640
Scott Enloe; Crown Point, IN 46307
Toni S Piazzon; Coupeville, WA 98239
Frieda Stahl; Pasadena, CA 91106
Derek Gendvil; Las Vegas, NV 89117

Joe Carrera; Layton, UT 84041
Claire Amick; Boalsburg, PA 16827
Catherine Marciniak; Hillsboro, NH 03244
John Knipe; Rockaway Beach, OR 97136
Judy Becker; Philadelphia, PA 19126
Robert Blumenthal; Seattle, WA 98115
Brigid Geroux; Eau Claire, WI 54701
Darrel Bruck Jr.; Bourbonnais, IL 60914
Jose Sologuren; Dallas, TX 75219
George Yanney; Alliance, OH 44601
Jef Weisel; Pepperell, MA 01463
Mary Miller; Scottsdale, AZ 85250
Wickard Workman; Lakeland, FL
Richard Cerie; Lyman, WA 98263-0357
Edwina R. Smith; San Francisco, CA 94114-2323
Julie Glenn; St. Louis, MO 63110
Matt Gonzales; Oak Park, MI 48237
Anthony LaRocca Jr.; Staten Island, NY 10305-2318
Damon Phillips; Alexandria, VA 22311-3707
Megan Brizzolara; San Quentin, CA 94964
Beverly Jahn; Colorado Springs, CO 80904
Mary Jo Brinker; Ellwood City, PA 16117
Don Bay; Pacific Palisades, CA 90272
Marie Finn; Yardley, PA 19067
Saun Rego-Ross; Tucson, AZ 85742
Judith Garson; New York, NY 10019
Zach McFall; Cedartown, GA 30125
Emily Liu-Elizabeth; San Jose, CA 95130-1015
Rohan Sabnis; Claremont, CA 91711
Joanna Kelly; West Hollywood, CA 90046
Betty Field; Laguna Woods, CA 92637
Larry & Darlene Raunio; Tomahawk, WI 54487
Ronda O'Bryant; Butler, PA 16002
Gene Cort; Wakefield, RI 02879-6611
Mitchell Friedman; Walnut Creek, CA 94596
Corey E. Olsen; Delafield, WI 53018-2441
Lisa MacLeod; Sahuarita, AZ 85629
Jacqueline Friederichsen; Knoxville, TN 37917
Connie Murray; Atlantic Highlands, NJ 07716
Louis McCarten; Glendale, CA 91209-0684
Michael Gross; Flushing, NY 11354
Eugene Whitehead; Los Angeles, CA 90032-0332
Eric Weissberg; Woodstock, NY 12498
Michael Mischak; Collinsville, CT 06019
Wendy Bowman; Minneapolis, MN 55411
Sharon Fortunak; Cottage Grove, MN 55016-1909
Brad McClellan; Reno, NV 89502
Alicia deHerrera; Los Lunas, NM 87031
Elizabeth Guthrie; Rochester, NY 14610
Ronald Hurston; Wayland, MA 01778
Harold A Samuels; Woodland Hills, CA 91367-4057
Evelyn Brakopp; Kailua, HI 96734
Kristian Kelly; Redding, CA 96002
Andrew S McNamara; Brooklyn, NY 11217
Maureen Schulze; Atco, NJ 08004
Alex Balboa; Bel Air, MD 21015-1100
Anthony Albert; Corvallis, OR 97330
Wade C. Johnson; N. Scituate, RI 02857-2959
Ronald Ford; Midlothian, VA 23114-3398
Charles S Wilson; Bloomington, MN 55425-1819
Bonita De Trinis; Lyndhurst, VA 22952-2209
Evelyn Haas; Phila., PA 10153
David Ellis; Clovis, CA 93611
Doug Mishler; Morganton, GA 30560
Robert Shannon; Hermosa, SD 57744
Larry Siegel; Plainsboro, NJ 08536
Victoria G Mosse; Portland, OR 97203-3943
Lauren McGlynn JD; Hillsborough, NC 27278
Mary Ferraro; Aurora, CO 80010
Patrick Lesher; Corvallis, OR 97333

Mary Buchwald; Brooklyn, NY 11217
Brenna Shafizadeh; Walnut Creek, CA 94598
Richard Arroyo; Monterey Park, CA 91754-6011
Vincent Malizio; Venice, FL 34293-4934
Larry Lambeth; Springfield, MO 65810
Curtis Swain; Santa Cruz, CA 95065
Michele Gannon; Mooresville, IN 46158
Beth Franks; Cincinnati, OH 45215
L. Eleanor Finney; Laguna Niguel, CA 92677-1811
Justin Barthle; Fort Myers, FL 33965
Susan Susan Vogt; Fairbanks, AK 99712
Dennis Landi; Orange, CA 92867
Lori Smith; Blue Springs, MO 64015
Louis C. Harris, Jr.; Cherry Hill, NJ 08034
Robert Hodge; Portland, OR 97212
Valerie Ruth Young-Williams; Seldovia, AK 99663
Bonnie Sleeper; Bonita Springs, FL 34135
William McEachen; Leawood, KS 66206
Alexa Gusick; Los Angeles, CA 90028
Charles Leiden; Altoona, PA 16602
John Papandrea; New York, NY 10024
Sieglinde Wilson; Aberdeen, MD 21001
Patty Fagan; Dayton, TN 37321
Arthur Kaltenborn; Kent, OH 44240
Byron Davis; Salt Lake City, UT 84117
Beverly A. Williams; Ashland, OR 97520
Betsy Moon; Austin, TX 78733
Sharon Keys; Alexandria, VA 22304-2837
Celia K Fite; Lynn Haven, FL 32444-3406
Leonard B Chandler; San Jose, CA 95116
Karen Kirschling; San Francisco, CA 94117
Dorrie Rosenfeld; Vallejo, CA 94589
Kate Ryan; Delhi, NY 13753
Phyl Morello; White Pine, TN 37890
Arlene Thompson; Royal Oak, MI 48073-4277
Jay W. Clawson; Ithaca, NY 14850
Eddie Griffiths; Seattle, WA 98103
Joan Walker; Bishop, CA 93514
Pamela Davis; Springfield, OH 45502
Eric H. Chipman; Newton, MA 02458-1354
Jan Conley; Lake Nebagamon, WI 54849
Robert Moore; Princeton, NJ 08542
Madeline Shapiro; Whittier, CA 90605
Joseph Weatherby; Marsing, ID 83639
Cheri Langlois; Mendocino, CA 95460
Donald Judd; Pittsburg, KS 66762
Sean O'Toole; Edinboro, PA 16412
Spencer Stall; El Prado, NM 87529
Angela Elniski; Hamburg, NY 14075
Pam Gierut; Orlando Park, IL 60467
Merry Guben; Philadelphia, PA 19128
Mary Rausch; Lynnwood, WA 98087
Rosamond Mitchell; Fortuna, CA 95540
Hope Ewing; Norman, OK 73071
Liz Mostov; New York, NY 10024
Peter Roche; Santa Fe, NM 87507
Gary Hahn; Maumee, OH 43537
Ruth Schneider; Hazen, ND 58545-4107
Danny DeTora; Citrus Heights, CA 95610
Darlene Wolf; Naples, FL 3410
Janet Drake; Framingham, MA 01701
Asher Platts; Gorham, ME 04038
Pamela Hardy; New York, NY 10028
Jennifer Hochberg; Fairfield, CT 06825
Frances Harriman; Cumberland, RI 02864
Mike Scott; Walnut Creek, CA 94596
Andrew Butz; Portland, OR 97202
Carol Roberto; Cincinnati, OH 45255
Sharon Raum; Gibson City, IL 60936
Sharon Haley; Lebanon, OR 97355-9732

Henry W. H. Weis; Philadelphia, PA 19147-3036
Debra Combs; Decatur, GA 30033-4329
Gail Harrison; Mesa, AZ 85208
Jane Engelsiepen; Carpinteria, CA 93013
Steven Goldman; New York, NY 10065
Ashre Blackstone; San Marcos, TX 78666
Scott Bigham; Leavenworth, WA 98826
Mary V. V. Cassell; Eugene, OR 97402
Susan Willholt; Cardiff by the Sea,, CA 92007-1905
Phoebe Wong; Olympia, WA 98506
Al Giles; Austin, TX 78749
Z Rains; New York, NY 10026
David Buck; Staten Island, NY 10303
Shena F McLaren; Santa Monica, CA 90405
Dartene Jakusz; Amherst Jct., WI 54407
Doraine Gordon; Red Oak, TX 75154
Dolores Halls; Las Cruces, NM 88011
Mark Novotny; Countryside, IL 60525
Fidencio Campos; Sterling, IL 61081
Joel Finley; Ogdensburg, NY 13669
Michael Dague; Spokane, WA 99201
Mary Lickert; Charleston, WV 25323
Linda Howe; Belmont, MA 02478
Michael Rotcher; Mission Viejo, CA 92692
Willis G. GENE Farmer; Cheyenne, WY 82007
Cory Tye; Oklahoma City, OK 73114
Carlton Banks; Camby, IN 46113
James Button; Lafayette, CO 80026
Esther Nelson; Charleston, SC 29412
Paul Mayer; Livingston, TX 77399
Mary Strickland; Greenville, OH 45331
Judith Castiano; Peoria, AZ 85345
Mike Hansen; St Charles, IL 60174
Brian Billings; Wilmington, DE 19801
Cletus Stein; Amarillo, TX 79106-4418
Connie Sly; La Verne, CA 91750-1811
Landon Utterback; Racine, WI 53405
Winnie O'Neill; Hockessin, DE 19707
Jim Barber; Dallas, TX 75246
Charmaine Bailey; San Francisco, CA 94118-3604
Angela Knapp; Coral Gables, FL 33146
Angie Hughes; St. Albans, WV 25177-3782
Lynn Minneman; Portland, OR 97205-1514
Carolyn Rhazi; Mission Viejo, CA 92691
David Berne; South Lake Tahoe, CA 96150-6349
Andy Lynn; Douglasville, GA 30135-1108
Dan Karney; West Chester, PA 19380-1709
Margaret Holcomb; Jacksonville, TX 75766
Mary Fitzgerald; Simi Valley, CA 93065
Jose Ricardo Bondocq; San Francisco, CA 94132
Marilyn J. J. Snider; Lakewood, WA 98439-1228
Sara Bhakti; Kirkland, WA 98033
Judy Haggard; Fieldbrook, CA 95519
Rachel Pickett; Asheville, NC 28801
Carol Hartzell; Hudson, IL 61748
Judith Rosen; Brockton, MA 02302
Roscoe Jackson; Detroit, MI 48219
Nancy Woolley; Stoughton, MA 02072
Anthony Martin Dambrosi; Middletown, NY 10940-4003
Joe Futterer; Topanga, CA 90290
Eric Boyce; Hatboro, PA 19040-0274
Lyle Linder; Franklin, NY 13775
John A Sokolnicki; Madison, CT 06443
Kenneth White; Anniston, AL 36201
Donna Hamsher; New Orleans, LA 70115
Matthew Bennett; Port Washington, NY 11050
Phyllis Rowe; Phoenix, AZ 85014
Mary B. Williams; Salt Lake City, UT 84115
Keith Carr; Sun Valley, NV 89433
William Epp; Terre Haute, IN 47803

Sally Gardner; Culver City, CA 90232
Sally Tessicini; Sarasota, FL 34243
Jan Bueker; Topeka, KS 66606
Felicity Hohenshelt; Jacksonville, FL 32246
Louise Hopkins; Spokane, WA 99205
Diana Wojtyniak; Shelby Twp, MI 48317
Cathie Sullivan; Santa Fe, NM 87506
Dawn Kosec; Austintown, OH 44515
Jill Armentrout; Lake Mills, WI 53551
Ellen Smith; Havertown, PA 19083
Patrick Cameron; El Cajon, CA 92021
G. Gouge; Athens, GA 30605
Daniel Zelter; L.A., CA 90046
Stephanie Allen; East Aurora, NY 14052
Susan Blain; Gardner, MA 01440
Joe Serpico; Clearwater, FL 33764
Dorri and Florence Raskin; Northridge, CA 91326
Karen Fedorov; Bealeton, VA 22712-7844
Christopher Lawrence; Spokane, WA 99203
Christine Dobrowski; Louisville, KY 40207
Wilkie and Patricia Talbert; Red Bluff, CA 96080
Matthew Cleveland; Elizabethtown, PA 17022
Charles Palm; Corpus Christi, TX 78411-2220
Scott Bernstein; New York, NY 10014
Bill K Miskall; Dittmer, MO 63023
Robert Bohmfalk; Seguin, TX 78155
Celia McIntosh; Miami, FL 33177
Dorothy M Werner; Bradenton, FL 34205
Joanne Granzow; Dayton, OH 45419-3804
Karen Hunt; Larned, KS 67855
Richard Gale; Daly City, CA 94015-3727
Brady Rubin; Los Angeles, CA 90027
Balfour Gerber; San Francisco, CA 94132
Andrew Katsetos; Salem, OR 97301
Don Mutchler; Oxford, MS 38655
Michele Nihipali; Hauula, HI 96717-9647
Toni Garmon; Dawsonville, GA 30534-5732
Mary H Levendos; San Jose, CA 95135-1318
Lee Kler; Stamford, CT 06902
Anita Das; Seattle, WA 98115
Harvey Schaktman; Shelburne Falls, MA 01370
Raymond Chapman; Cocoa, FL 32926
Rachel Kaplan; Petaluma, CA 94952
Cindy Davala; Blenheim, NJ 08012-3145
Erin Yarrobino; Ozone Park, NY 11417
Mr and Mrs James Denison; Long Beach, CA 90815
George E Kauschp; Roseburg, OR 97470
William Gardner; Three Rivers, MI 49093
Bob Gutermuth; Gainesville, FL 32608-1150
Patty Hopkinson; Barrington, RI 02806
Kathryn Camp; Carbondale, CO 81623
Stella Trudel; Floyd, VA 24091
Shlomo Nessim; Milltown, NJ 08850
Mary H Levendos; San Jose, CA 95135-1318
Suzanne McColl; Wilmington, NC 28403
Joyce Becker; Merrick, NY 11566
Michael Morgan; Washington, DC 20010
Kinsey Service; Goleta, CA 93117
Rayna Knobler; Buffalo, NY 14222
Donald J. Shaw; Syracuse NY 13207
Jeffrey Kalman; Pound Ridge, NY 10576
Robert Lassiter and Family; Oakland, CA 94610
Michael Cozad; Edmonds, WA 98020
Kristen Zehner; Marshall, WI 53559-9207
Mindy Stone; Portland, OR 97232
Andrew Bertuglia; Durham, CT 06422
Robert Luke; Penn Valley, CA 95946
Angie Afolter; Mundelein, IL 60060
Jeane Stallard; Chester, CT 06412
Anthony Tullio; Dearborn, MI 48124

Nancy Longo; Dayton, OH 45119
James Facette; Oakland, CA 94619
Misty Culver; Ames, IA 50014
David M Kleiman; Austin, TX 78723
Chadwick Cox; Norman, OK 73071
Rosellen McFarland; Painted Post, NY 14870
Valerie Heinonen; New York, NY 100092510
Lorena Loubsky; Colrain, MA 01340
H. Macdaniel Ball; Midway, UT 84049
Barbara Buckley; N. Middlesex, VT 05682
James Register; Wilmington, NC 28411
Kristi Collins; Arlington, TX 76012
Gina Wulff; Hiram, GA 30141; Washington, CT 06793
Susan & Hubert van Asch van Wyck; Washington, CT
Dianne Saichek; San Jose, CA 95125
Cheryl Thacker; Pound Ridge, NY 10576
Brad Badger; Lawrence, KS 66049
Elizabeth Johnson; Pequot lakes, MN 56472
James Hinton; Parker, CO 80134
Keith Kreger; Springfield, OR 97478
Bruce Pech; Boulder, CO 80302
Raymond C Keeling; Milford, MI 48381
Alex Keir; Glendale, CA 91226
Robert R Renshaw; Marlton, NJ 08053
Constance Adams; Tucson, AZ 85719
Nancy Skeen; Fresno, CA 93726
Adrienne Hochberg; Jupiter, FL 33477-5947
Nicholas Heikkila; Greenfield, MA 01301
Anne Lewis; Kent, WA 98031
Francine Hasenbein; Cullman, AL 35055
Carolyn Treadway; Normal, IL 61761
Mary Arnoldussen; Menasha, WI 54952
Hermine Marshall; Kensington, CA 94707
Sharlene White; Santa Fe, NM 87507
Roy Treadway; Normal, IL 61761-1621
Blake Payne; Fort Smith, AR 72904
Elizabeth Johnson; Albany, CA 94706
Kevin Smith; Albany, NY 12209
Dennis J Deshaies; St. Augustine, FL 32086
Craig D Olawsky; Brookings, SD 57006
Stephanie Hammond; Pfafftown, NC 27040
Daniel Tiarks; Los Angeles, CA 90046
Linda Heiberger; Boston, VA 22713
Julio Paz y Mino; Havertown, PA 19083-3004
James Chapman; Libby, MT 59923
Garry M. Doll; Williamsport, PA 17701
Howard Cohen; Palo Alto, CA 94306
Carl S; N. Redington Beach, FL 33708
Kyle Christensen; Dayton, OH 45420-3016
Kelly Reilly; Orlando, FL 32819
Jerry Harsh; Burkburnett, TX 76354
Lisa Kasai; Campbell, CA 95008
Elizabeth Riseden; Carson City, NV 89701
George Brich; Elkhart, IN 46514
Paul M McDermott; Los Angeles, CA 90065
Lilith Chunn; Brighton, MA 02135
Arthur C. Moore; Henderson, KY 42420
Martha Morton; Plymouth, MA 02360-1217
Margaret Kibbee; Greenville, MS 38701
William Bodden; Redmond, OR 97756
Richard Pollini; Jamison, PA 18929
Jean Craig; Fort Worth, TX 76115-3008
Stuart Mork; Seattle, WA 98117
Linnea Whitman; Texarkana, TX 75503
Shirley Gilbreath; Valley Mills, TX 76689
Gloria Supnick; Stony Brook, NY 11790
Mark Edgren; Berkeley, CA 94708-1410
Fred Koster; New York, NY 10028
John McWilliams; Dallas, TX 75248
Grace Neff; Albany, OR 97322

Richard & Carolyn Rosenstein; Los Angeles, CA Jeannine Hill; Petaluma, CA 9495
Edward Hanson; Commerce City, CO 80022
Carlene Petty; Shepherdsville, KY 40165
Martin Powers; Chicago Ridge, IL 60415
Ronda Snider; Gig Harbor, WA 98329-5131
Karen Kay Pierce; White Hall, MD 21161-8907
Robert Tomashevsky; Archer, FL 32618-6959
C. Cockrell; San Antonio, TX 78213
Mauro Ferrero; Los Angeles, CA 90045
Alexander Rouhana; Altamonte springs, FL 32714
Dean Borgeson; Brooklyn Park, MN 55428
Tony Bavry; Columbus, OH 43214
Ivo Calderin; Miami, FL 33156
Julie Figueroa; Port Charlotte, FL 33954
Craig Foley; Chicago, IL 60640
Arnold Lippin; Brooklyn, NY 11201
Johann Hollar; Saint Paul, MN 55119
Joanne M Gull; Phoenix, AZ 85048
Barb and Phil J. Powell; Rochester, MN 55904
Jillian Forschner; Murrysville, PA 15668
Brian & Rita Cohen; Fresno, CA 93726-0874
Lorraine D. Johnson; Seattle, WA 98118
Steven Mendlin; Pleasant Hill, CA 94523
Elizabeth Aden; Mt. Vernon, TX 75457
Russell Novkov; Madison, WI 53705
William Rohan; Williamsburg, MA 01096
Barbara Fike; Dexter, MI 48130
Yana Goldfine; Berkeley, CA 94705
Charlie Williams; Holland, MI 49423
William C Preston; Crete, IL 60417
Paul Scott; Coos Bay, OR 97420
Hattie Nestle; Athol, MA 01331
Pamela Hosler; St. Louis, MO 63139
Tiffany Formilan; Bergenfield, NJ 07621
Daryl Shutel; Littleton, CO 80127
Kyle Umphenour; Joplin, MO 64801
O. Lewis; Los Angeles, CA 90009
Linda Birch; Rosemead, CA 91770
Sara Porter; Midway, KY 40347
Cheryl Zarn; Manistee, MI 49660
Florence O Wagner; Lopez Island, WA 98261
Felicia Dycus; Chandler, IN 47610
Travis Harvey; Boothwyn, PA 19061
Wade Higgins; Renton, WA 98056
Nadine A Lauru; Placentia, CA 92870
Dan Puetz; Palatine, IL 60067
Donna Nina; Teaneck, NJ 07666
Joe Trost; Springfield, IL 62703
Mary Lynn Hanley; New York, NY 10024-3705
Brian Thorbjornsen; Cloquet, MN 55720
Darrell Neft; Costa Mesa, CA 92626
Michelle Wenderlich; Canandaigua, NY 14424
Ernie Nickels; Tempe, AZ 85282
Andres Mejides; Homestead, FL 33031
Ian Williams; Ojai, CA 93023
Adelaide Gomer; Ithaca, NY 14850
Sue E. Dean; Scottsdale, AZ 85266
Lois Kyes; Lehigh Acres, FL 33936
Maria Gomez; Mountain Home, AR 72653
Wayne Kelly; Ashland, OR 97520-2241
Michael S. Smith; Berkeley Heights, NJ 07922
Debra Saude; Sweet Home, OR 97386
Teri Greene; Houston, TX 77008
Linda Mazer; Washington, DC 20009
Mrs. Jack McMullen; Montgomery, AL 36109
Jessica Marcy; Seattle, WA 98103
Carlos J. Echevarria; El Segundo, CA 90245-2530
Kathlene Jordan; Philadelphia, PA 19130
Joe Ginsburg; Seattle, WA 98133-7729

John Seidel; Colorado Springs, CO 80917
Judy Genandt; East Dundee, IL 60118
Annette Cullipher; Balsam Grove, NC 28708-9657
Rahsaan Wiggins; Warner Robins, GA 31088
Matthew Johnson; Austin, TX 78703
Charles Tator; Patchogue, NY 11772
Jan Lubin; Honolulu, HI 96816
Jan Avilla; Portola Valley, CA 94028
John & Ann Wright; Oak Harbor, WA 98277
Richard Fronck; White Plains, MD 20695
Stephen and Robin Newberg; North Granby, CT 06060
Rosalie Wolff; Paso Robles, CA 93446
Halli Slotnick; Douglaston, NY 11362
James Silver; Santa Ana, CA 92706-0263
Amin Arikat; Hercules, CA 94547
Betty Root; Cleveland, OH 44125
Lilli Hoffman; Charlottesville, VA 22902
Maitland Alexander; Moorpark, CA 93021
Noel Petrie; Philadelphia, PA 19143
Kent Minault; Sherman Oaks, CA 91423-1531
David Yanowitz; Van Nuys, CA 91406
Robin Poppe; Barnum, MN 55707
Gwen Clayton; Matthews, NC 28104-8539
Michael Neidigh; Columbia City, IN 46725
Phyllis Jones; Dallas, TX 75219
Michael Ruderman; Boulder, CO 80304
Rich Mackin; Portland, OR 97211
Beth Laurer; Crawfordsville, IN 47933
Paul Dolinko; Glenview, IL 60025
Phyllis Vedder; East Northport, NY 11731
Ronald Lattanzio; New Lenox, IL 60451
Craig Holme; Silver City, NM 88061
Terrance Manning II; Salem, OR 97305
Virginia Hadley; Cosmopolis, WA 98537
Tanis Fletcher; North Falmouth, MA 02556
Marge Wood; Austin, TX 78748
Stephen Gliva; Evanston, IL 60202
Doris Berger; Brookline, MA 02446
(The Rev.) Allan B. Jones; Santa Rosa, CA 95404
Chris Pomeroy; Austin, TX 78753-2125
Lisa Vandermay; Renton, WA 98058
Linda Smith Schermer; Sedona, AZ 86336
Barbara Foose; Newbury, OH 44065
Michael Bennett; Dekalb, IL 60115
Karen Lind; Union City, NJ 07087-2889
Carrie Schudda; Oregon, WI 53575
Arlene Hickory; Lake Bluff, IL 60044
Nathaniel Childs; Miranda, CA 95553
Bill Leyrer; Seattle, WA 98102
Aleta Orlandoni; Orlando, FL 32817
Sheila Scaggs; Elmhurst, IL 60126
Stanley Becker; Long Beach, NY 11561-3915
Judy Cupp; Hope Mills, NC 28348
Raymond Johnson; Chazy, NY 12921
Roberta Bunsick; New York, NY 10016-4635
Thomas Poulson; Jupiter, FL 33458-2850
Ronald Kestler; Louisville, KY 40223-1236
Lisa Lewis; Stillwater, OK 74074
Morgane Le Morzellec; Astoria, NY 11106
Jeffrey Valentine; Norcross, GA 30092
Michael Crane; Sierra Vista, AZ 85635
William Stratton; Forestville, CA 95436
John Somdecerrf; Austin, TX 78752
Harold W. Piggott; Glen Carbon, IL 62034-1333
Wilford Nelson; Bloomfield, IN 47424
Joyce Crowley; Morton, PA 19070
M. Zaki El-Sabban; Adelphi, MD 20783-1210
Lorraine Foster; Portland, OR 97202
Susan Peirce; Lyons, CO 80540
Edie Clark; Santa Margarita, CA 93453
M Eloise Adams; Bethesda, MD 20814-5415
Ned Egen; Tucson, AZ 85719
Rebecca McDonough; Menlo Park, CA 94025
Jeffrey Guidry; Austin, TX 78704
Mark Tolley; Nashville, TN 37215
Adriana Faria; Puyallup, WA 98375
Lorrain Foster; Portland, OR 97202
Clarence Robinson; Littleton, CO 80123-6652
Jerry Bloomer; Hot Springs, SD 57747
Heath Ashli Taranowski; Gold Bar, WA 98251
John Nettleton; Portland, OR 97213-6000
Keli Vaughan; Glendale, CA 91202
Navin Shankar; Austin, TX 78745
Cheryl Emmons; Boonville, IN 47601
Naomi Durant; Lindsborg, KS 67456
Elizabeth Karan; Oakland, CA 94609-2517
Deborah Freed; Lexington, VA 24450
Edh Stanley; Sacramento, CA 95823-1457
Barbara Paolucci; Staten Island, NY 10306
Vance Berger; Rockville, MD 20850
John Mayew; Landenberg, PA 19350
Craig Conn; Pittsburgh, PA 15212
Henry Lahey; Exeter, NH 03833
Joy Bergstrom; Wake Forest, NC 27587
Charlotte Duncan; Bristol, TN 37620
Ed Jocz; Freehold, NJ 07728-3149
Rick Pearson; Austin, TX 78750
Kirti Jani; Corona, CA 92879
Ron D. Maxwell; Austin, CO 81410
Sue Rogan; Middleton, WI 53562
Mary Teeters; Grain Valley, MO 64029
Becky Daiss; Arlington, VA 22201
Jan Boudart; Chicago, IL 60626
Lynn Walker; Cleveland, OH 44110
Mary Ann Maikish; New York, NY 10010-7526
John J. Fodera Jr.; Flushing, NY 11355-5151
Timothy Martin; Woodside, CA 94062
Eva Futch; Las Vegas, NV 89145
Alyce Strong; Stuart, FL 34994
Ganesh Durgadas; Albany, NY 12208
Jon Anderholm; Cazadero, CA 95421
Alan Green; Spring Green, WI 53588
Rochelle Ohman; Eugene, OR 97402
Don Rowinsky; Youngstown, OH 44502
Cye Strowman; Mesa, AZ 85213
Janis Roze; New York, NY 10029
Kevin Riley; Nashville, TN 37205
Peg Pinard; San Luis Obispo, CA 93401
Michael Carney; Runnemede, NJ 08078
Wenhai Su; Fort Worth, TX 76115
Cheryl Vallone; Ashland, MA 01721-1020
Paul R Denault; Hampton, GA 30228-3180
Peter Brannon; Somerset, NJ 08873
Donlon McGovern; Portland, OR 97211
Shena Kieval; Soquel, CA 95073
Maureen Gayton; San Antonio, TX 78260
Barry L Moore; Montclair, NJ 07042-3834
Thomas Wilson; Baltimore City, MD 21205-3254
Inanna Lafevre; Santa Rosa, CA 95407
Lenny Chrostowski; Macomb, MI 48042
Suhail Shafi; Ozark, AL 36360
Ellen Atkinson; Danville, VA 24540
Barbara F.; Lutz, FL 33548
Douglas Orians; Marion, OH 43302
Carol Carson; Brooklyn, NY 11220
Andreia Shotwell; Wheat Ridge, CO 80033
Suzanne Hodes; Waltham, MA 02453-2409
James Ledford; Cheney, WA 99004
Bill Denneen; Nipomo, CA 93444
Dan Deans; Ashburn, VA 20147

Suzanne Rodgers; Rochester, NY 14622-1121
Val Sanfilippo; San Diego, CA 92111
Jordan Pakaki; El Paso, TX 79924
Lynda Leibowitz; Newton, NJ 07860
Carol M Lewis; Hooper, NE 69031
Eileen Kuch; Hyattsville, MD 20783-1020
Derek Postlewaite; Washington, PA 15301
Jen Bills; Chicago, IL 60622
Donna Raicevic; Lihue, HI 96766
Sydney McDermott; Bullhead City, AZ 86442
John Kesich; Millerton, PA 16936
Gita Dev'; Woodside, CA 94062
Ashwin Purohit; Gloucester, MA 01930
Albert Amodeo; Howells, NY 10932
Molly Hale; Menlo Park, CA 94025
Stacey Shellhammer; Conneaut, OH 44030
Mercedes Smith; San Antonio, TX 78216-6771
Mark Pass; Waukesha, WI 53186
Koreen Kruger; Champions Gate, FL 33896-8887
John Cevasco; Northfield, MA 01360-0078
Stephanie B. Mory; Seabrook, SC 29940
Lori Albee; Salinas, CA 93907
Anita Lock; Oberlin, OH 44074
Lois Jordan; Tucson, AZ 85749
Glen Kappy; Albuquerque, NM 87106
Suzanne Pilzer; New York, NY 10014
Steven Harwood; Emporia, KS 66801
Richard Di Frances; Hartland, WI 53029
Brenda L Hill; Greenwood, MO 64034-8986
Everett Mercer; Rochester, NY 14616
Allen Keltner; South Bend, IN 46628
Noliwe Gofhamodimo; Washington, DC 20008
Lori Miller; Joshua Tree, CA 92252
Marissa Dupont; Somersworth, NH 03878
Natalie Batovsky; Union Bridge, MD 21791
Max Ramirez; Pawtucket, RI 02861
Katherine Smith; Euclid, OH 44117
James Hamillton; pve, CA 90274
Kris Pagenkopf; Gainesville, FL 32607
Craig Tyrone; Los Angeles, CA 90065
Betts Harley; Costa Mesa, CA 92627
Sherley Redding; Newport News, VA 23606-2225
Jennifer Cody; New York, NY 10002
Richmond Haustein; Pella, IA 50219-1224
John and Martha P Stoltenberg; Elkhart Lake, WI
Greg Hughes; Chandler, AZ 85286
Chuck Wieland; San Ramon, CA 94583
Pamela Meier; Kanab, UT 84741
Jennifer Angelone; Portland, ME 04103
Eren Giles; Austin, TX 78746
Mary Ann Smale; Steuben, ME 04680-3110
Linda Gazzola; Tarrytown, NY 10591
Carolyn Hawk; New Franken, WI 54229
Drena LaPointe-Meyer; Gilbert, AZ 85234
Mallika Henry; Richmond Hill, NY 11418
Maurita Bernet; Phoenix, AZ 85068
Lyn Strangstad; Mineral Point, WI 53565
William Links; Fond Du Lac, WI 54935
Steve E. Babin; Normal, IL 6171
MaryGrace Brown; Mount Sinai, NY 11766
Suzanne Kruger; Harpers Ferry, WV 25425
Jamison Dupree; Mobile, AL 36608
Nathan Van Mechelen; Portland, OR 97213
Fran Larson; Pacifica, CA 94044
Betty J. Van Wicklen; Watervliet, NY 12189-2915
Chailley Goss-Garner; Chaparral, NM 88081-7455
Peter H Lee; Saratoga Springs, NY 12866
Barbara Tetro; New York, NY 10029-6453
Jeffrey Jones; Lackawanna, NY 14218
Milton Shapiro; Philadelphia, PA 19115

Raul Anorve; Los Angeles, CA 90032
Laura McKee; Sebastian, FL 32976
Robert Dorst; Wauwatosa, WI 53225
Patricia J Potter; Wallington, NJ 07057
Diana Brunswig-Bosso; Arnold, MO 63010-3020
Ralph Meakin; Wallington, NJ 07057
Barbara Fry; Alton, IL 62002
Joan Dalton; Wallington, NJ 07057
William Carman; Garland, TX 75044
Jeanne Edwards; La Cañada Flintridge, CA 91011
James Kofron; Rochester, NY 14612-2370
Debbie & John Richards; Fresno, CA 93710
Christine Pasmore; Victorville, CA 92395
Elizabeth Alexander; Dallas, TX 75248
Janie Moore; Portland, OR 97205
Carmine Masucci; Eastchester, NY 10709
Helen Edwards; White Hall, IL 62092
Marc Gregory; Beverly Hills, CA 90209
Rick Bissonnette; Cuyahoga falls, OH 44223
Judy Lujan; Albuquerque, NM 87197-6986
Kathy Bowers; Grand Junction, CO 81507
Valerie Nixon; Richmond, VA 23235-3934
Jeffrey Bedrick; Newtown Square, PA 19073
Dorothy Rasmussen; Poulsbo, WA 98370
Janet Knapp; Campbell, CA 95008
Chris Tucker; Rio Nido, CA 95471
Steven Wiener; Vista, CA 92084
Diane Tholin; Santa Ana, CA 92706
Libbe Madsen; Laytonville, CA 95454
Wendy Olney-Rattel; St. Croix Falls, WI 54024
Megan Langreck; Stevens Point, WI 54481
Denise Romesburg; Phoenix, AZ 85021
Ann Remkus; Adrian, MI 49221-1755
Michael Duffey; Ft. Walton Beach, FL 32548-5662
Elise Aronov; Montclair, NJ 07042
Jeannie Roberts; Madison, WI 53705
Antonia Matthew; Bloomington, IN 47401
Ancie Leigh' Asheville, NC 28804
Vic Burton; Kansas City, MO 64113
Tracey Ahring; Dennard, AR 72629
Michael Prete; Tucson, AZ 85719-3609
Karen Weehler; San Antonio, TX 78228
Dennis Jones; Cottage Grove, MN 55016
Jane Leaetherman Van Praag; Bartlett, TX 76511
Ellen Murphy; Bellingham, WA 98225
Kay Wilson; Bremerton, WA 98311-3230
Sandra Cutter; Anacortes, WA 98221-2987
Ancie Leigh; Asheville, NC 28804
Ernest Scholz; San Francisco, CA 94109
Claire S. Perricelli; Eureka, CA 95501
Susan Wald; Southampton, NY 11969
Amanda Jasso; Olmito, TX 78575
Vero Brentjens; Edenton, NC 27932
Beedy Parker; Camden, ME 04843
Terry Azzarello; LaGrange Park, IL 60526-6008
Carmen Paxton; Louisville, KY 40245
Paula Pear-Brownlow; Lancaster, CA 93535-5220
Dr. Md. Sayedur Rahman; Dhaka, ot 1000
Kathleen Lage; Fenton, MI 48430-1085
J. Gist; Clarksville, TX, TX 75426
Marlena East; Louisville, KY 40204
Nancy Dorsey; Overland Park, KS 66212
Kate Jamal; Philadelphia, PA 19147
Rodney Dennehy; E. Stroudsburg, PA 18301
Joseph Shulman; San Diego, CA 92115-6932
John La Stella; Charlotte, NC 28229
Ann Fonfa; Delray Beach, FL 33446
Boris Dimbach; Philidelphia, PA 19151
Jack Carlson; Iowa City, IA 52246
Elizabeth Butler; Yonkers, NY 10705-1018

Carol Dickason; Sonoma, CA 95476
 Holly Chisholm; Oxford, MI 48371
 Ronald Richardson; Missouri Valley, IA 51555-8051
 Alan J Nishman; Haydenville, MA 01039
 Judy Reynolds; Knoxville, TN 37931
 Dr. Todd Walker; South Milwaukee, WI 53172
 MJ Perona; Cupertino, CA 95015
 Baker Smith; Seattle, WA 98168
 Linda Vitale; Surprise, AZ 85388
 Laurie Manis; Rock Island, IL 61201
 Marcia Gagliardi; Athol, MA 01331
 Monika Lesch; Morganton, NC 28655
 Michael Wollman; San Luis Obispo, CA 93405
 Glen Anderson; Lacey, WA 98503-2723
 John Vinson; Olympia, WA 98501-2775
 P. Johansen; Walnut creek, CA 94596
 Kelly Riley; Mechanicsburg, PA 17055
 Nancy Bellers; Easton, PA 18042
 Joanie Laine; Desert Hot Springs, CA 92240
 Alice Kelly; Felton, CA 95018
 Jeremy Hart; Houston, TX 77096
 Virginia Sharkey; Santa Rosa, CA 95407
 Deanka Grisham; Jonesboro, GA 30236-4188
 Carol Gabor; Stratford, CT 06614
 Marlowe A Mogul; Woodland Hills, CA 91367-5411
 Dave Waugh; San Marcos, TX 78666-9462
 William Mac Bean ; Klamath Falls, OR 97603
 Nancy Ellingham; Bellevue, WA 98006-3525
 PI Norton; Lewes, DE 19958
 Debbie Huffman; Houston, TX 77061
 Joanne Groshardt; Richardson, TX 75081-4727
 Michael Homer; Lubbock, TX 79416
 Scott Zubricky; Lakewood, OH 44107
 Dorinda Kelley; Portland, OR 97220
 David Buck; Staten Island, NY 10303-1648
 B. Allen Weiss; Allendale, NJ 07401
 Richard Ulrich; Hinckley, MN 55037
 Janice Anderson; Columbus, OH 43207
 Jessie Rosenthal; Albany, NY 12203
 Olive Wilson; Pringhar, IA 51245
 Erin Foley; Hazlet, NJ 07730
 Richard Patten; Minneapolis, MN 55406
 Nancy Farrell; Tacoma, WA 98406
 Eric Richards; Denver, CO 80218
 Barbara Zeluck; New York, NY 10011
 Stewart M. Robinson; Cleve Hts, OK 44118
 Connie L Greene 2330 South Circle Drive; Arbor, MI
 Patricia Blair; W Toluca Lake, CA 91602
 Carmen Bonilla-Jones; Venice, FL 34293
 Susan Reichert; Torrance, CA 90503
 David Volckhausen; Mahopac, NY 10541
 Dagmar Fabian; Cockeysville, MD 21030-2592
 Kelly Garbato; Plattsburg, MO 64477
 Tony Theil; Philadelphia, PA 19120-3043
 Olivia Watt; Portland, OR 97231-2102
 Randi Holloway; Plano, TX 75074
 Jack Harrington; Deer Isle, ME 04627
 Joel Myers; Apex, NC 27502
 Mary Dean; Chicago, IL 60629
 Carol J Johnson; Kansas City, MO 64113
 Sara Fisch; Scottsdale, AZ 85260
 Sumner Pierce; Fort Lauderdale, FL 33309
 Sally Small; Columbus, OH 43202
 Cheryl Richard; SSF, CA 94080
 Rose Portillo; Los Angeles, CA 90039-2631
 Cathe Giffuni; New York, NY 10016-9258
 Sibby Houghton; Wellesley, MA 02482
 Barbara Stamp; Bloomington, MN 55438
 Roland Press; Hermosa Beach, CA 90254
 Gloria L. Klimczak; Akron, OH 44310-1958
 Travis Eichelberger; Arizona City, AZ 85223
 Chadwick Wright, M.D., Ph.D.; Lewis Center, OH 43035
 Patricia Olson; Sacramento, CA 95825-6604
 Katie Sirk; Woodbine, MD 21797
 Jody Gibson; Des Moines, IA 50321
 Alexandra Tumarkin; White Plains, NY 10605
 Russell Riley; Pensacola, FL 32506-3652
 Jean Hodgins; Ballston Spa, NY 12020-3544
 Sarah Rose; Coram, NY 11727
 Julie Sears; Richardson, TX 75080
 Dave Spieler; Pennsauken, NJ 08109
 Eric West; Daytona Beach, FL 32114
 Mary Frances Hogg; Salina, KS 67401
 Andrew Jones; Gladstone, MI 49837
 Louis G. Albano; Brooklyn, NY 11215-4910
 Dorothy Reichardt; Kennett Square, PA 19348-2324
 Michael Evans; Altadena, CA 91001
 Katherine Farago; Mesa, AZ 85210
 Dorothy Reichardt; Kennett Square, PA 19348-2324
 Cheri Dzubak; Yardville, NJ 08620
 Karen Jackson; Bowie, MD 20721
 Howard Kastan; Cameron Park, CA 95682
 Randall Moore; Hyattsville, MD 20781
 Carol Pearlman; Los Angeles, CA 90066
 Mikki Chalker; Binghamton, NY 13905
 Kim Starling; Loveland, CO 80538
 Budalur Thyagarajan; San Antonio, TX 78249
 Ruth Bescrypt; Tucson, AZ 85747
 Lemond Dye; Deerbrook, WI 54424-9371
 Mathew Driscoll; Roseville, CA 95661
 P D; Fort Lauderdale, FL 33301-1173
 David Thibodeaux; Boulder, CO 80305
 Sandra Henry; Summit Point, WV 25446
 Ron Polacsek; Palm Desert, CA 92260
 Liana Sonne; Port Townsend, WA 98368
 Cathryn Schiesser; Pearland, TX 77581
 Helen J Franklin; Harvey, LA 70058
 David Grace; San Francisco, CA 94119
 Sahara Gonzalez; Bronx, NY 10462
 Judith Lienhard; Portland, OR 97225
 Christine Danner; Port Huron, MI 48060
 S Nam; New York, NY 10040
 Arthur Mink; Seattle, WA 98126
 Mark Burwinkel; Cincinnati, OH 45223
 Dottie Palmer; Pittsfield, MA 01201
 Elizabeth Hartin; Cordova, TN 38018
 Lorelee Clark; Williamsburg, VA 23185
 Michael Toobert; Grass Valley, CA 95945
 Kathi Buffalo; Aberdeen, SD 57401
 Sue McDermott; Longwood, FL 32750
 Joanne Lind; Amherst, MA 01002
 Diana Artemis; Falls Church, VA 22042
 Dr. Steven F. and Mary C. Jennings; Little Rock, AR 72212
 Brooke Fenton; Desert Hot Springs, CA 92240
 Holly Cohen; Brewster, NY 10509
 Shelly Young; Coaldale, CO 81222
 Joseph Chaiklin; Concord, CA 94521
 Andrew Collings; Philadelphia, PA 19119
 Emily C. Boone; Louisville, KY 40206-3119
 Joan Gordon; Orange, TX 77632
 Gary Lampman; Hendersonville, TN 37075
 Roger Sauer; Mercer Island, WA 98040-3975
 Nancy Gold; Sarasota, FL 34231
 Roger Bassett; Sonoma, CA 95476
 DonaLou Imier; Angola, IN 46703
 Stephen Brittle; Phoenix, AZ 85042
 Margaret Rees; Chapel Hill, NC 27514-4611
 Cath Haftings; Omaha, NE 68105
 Raymond Collins; Miami, FL 33177
 Anthony Montapert; North Hollywood, CA 91602

Patricia Alejandro; Covina, CA 91723
Christine Brazis; San Francisco, CA 94110
Ruth Miller; Chapel Hill, NC 27516
Jennifer Robertson; Airmont, NY 10952
Patrick De La Garza Und Senkel; Duncanville, TX 75137
Mary Halligan; Houston, TX 77062
Theresa Galvin; Brooklyn, NY 11231-4902
Virginia Levasseur; Norwich, CT 06360
Jack Ray; Newark, DE 19702-2307
Tom Fray; Huntington Beach, CA 92648-4231
Linda Hoyt; St. Louis, MO 63109
Irene Hancock; Charlottesville, VA 22901
Margery Carman; Rome, NY 13440
Irene Hancock; Charlottesville, VA 22901
Robertta Paro; Norwich, CT 06360
Michael J Bayouth; Wichita, KS 67207
Catherine Romain; Anaheim, CA 92807
Christiane Pistor; New York, NY 10021
Mark Watkins; Houston, TX 77070
Dale LaCognata; Fishers, IN 46038
Dena Hernandez-Kosche; Glendale, CA 91205
David Marshall; Tulsa, OK 74114-2125
Vicki Ferguson; Takoma Park, MD 20912
John Bucki; Buffalo, NY 14208
Rosie Jaramillo; Thornton, CO 80229
Beth Call; Walla Walla, WA 99362-2035
Christine Mirabelli; La Jolla, CA 92037
Andrew Wadsworth; Reading, PA 19606
Jytte Springer; Venice, CA 90291
Theresa Everett; Tarrytown, NY 10591
Carol Sawyers; Santa Cruz, CA 95062
Karen Giles; Portage, PA 15946
Janice Mastin-Kamps; Medina, OH 44256
Debbie Sturt; Pacific Grove, CA 93950
Richard Franc; Saint Paul, MN 55104
Ordell Vee; Madelia, MN 56062
Camilo Garcia; Bastrop, TX 78602
Alice and James McEroy; Sequim, WA 98382-8325
Gladys Schmitz; Mankato, MN 56001-3138
Blaine Jensen; Billings, MT 59104
Mary Meckley; Chicago, IL 60607
David Lilly; San Dimas, CA 91773-2456
Elizabeth End; Cincinnati, OH 45209
Mary Berry; Kerrville, TX 78028
Bernie and Marcia Altman; Kelso, WA 98626
Ben Gumpertz; Antelope, CA 95843
Christine Kwiecinski; West Seneca, NY 14224
John Teevan; Chula Vista, CA 91913
O' Neill D. Louchard; Port Townsend, WA 98368
Patricia Murphy; Seattle, WA 98103
Rod Hanson; Eugene, OR 97401
Cathy Consoli; Whittier, CA 90604
Deborah Reilly; Vashon, WA 98070
Julie Bannister; Tempe, AZ 85282
Donna Noe-Murdock; Rohnert Part, CA 94928
Deborah Reilly; Vashon, WA 98070
James H Jorgensen; Ames, IA 50014-3472
Nancy Gathing; Madison, WI 53714
Maria Watkins; Capitola, CA 95010
Art Hanson; Lansing, MI 48917
Carol McGrath; Coatesville, PA 19320
Brian Edmison; Dallas, TX 75226
K Danowski; Dallas, TX 75243
Barbara Kimbrell; Downey, CA 90240-3027
Mary Wigerman; Gray Court, SC 2945
Ken Fogel; Stone Mountain, GA 30087
Larry Fox; Freeland, WA 98249
Anton McInerney; North Reading, MA 01864
Mary West; Santa Rosa, CA 9

Corinne Pettey; Sacramento, CA 95842
Ms. Stacey A. Ward, Esq.; Los Lunas, NM 87031-7949
Marc S Rogers; Sherman Oaks, CA 91401
Thomas Nelson; Lansdowne, PA 19050-1304
Linda Haynes; Portland, OR 97202
Greg Hoffer; Saint Paul, MN 55116
Michaela Niermann; Redwood City, CA 94062
Julie Smith; Los Osos, CA 93402-4006
Geoff Fernow; Boise, ID 83704
Sophia Vassilakidis; Houston, TX 77006
Mike Wygant; Tampa, FL 33615
Chuck Johnson; Portland, OR 97206
Anne Roda; Seattle, WA 98118
Louis Rendon; Pasadena, CA 91106
Elizabeth Pernotto; Bellingham, WA 98225
Colette Guay-Brezner; Fairfield, IA 52556
Mickael Vandenberghe; Tucson, AZ 85710
Kate Terskan; West Allis, WI 53219
Greg Steuck; Golden, CO 80401-2587
Thomas DeMore; Austin, TX 78729
Robert M Samboy; Henderson, NV 89011
Stephanie Lent' Showlow; AZ 85901
Sarah Jaeschke; Kailua Kona, HI 96740
Jeanne Lamar; Sunnyvale, CA 94087
Norm Conrad; Seattle, WA 98103
Andreas Ohland; Cheltenham, PA 19012
Matthew Shapiro; Fort Lee, NJ 07024
William Rice; Merrill, WI 54452
Craig Cook; Santa Rosa, CA 95401
Jeannine Garon; San Ramon, CA 94582
G. Anderson; Overland Park, KS 66212
Susan Hallowell; Tucson, AZ 85704
Stella M. Aleman de Gallardo; Woodside, NY 11377-3023
Esther Massimini; Phoenix, AZ 85028
Keith Bragdon; Pearl City, HI 96782
Lynn Wolf; Saugus, CO 91350
Wilma Jaffe; Oakland, CA 94602
Esther Ouray; Minneapolis, MN 55407
Jessica Bolton; Atlanta, GA 30328
Herbert Gaudette; Poulsbo, WA 98370
William Marion; Cambridge, MA 02139
John Consentino; Irvine, CA 92612-2317
William Albino; Grass Valley, CA 95945
Pierre Grady; Milpitas, CA 95035
William J. J. Cleary Jr.; Los Angeles, CA 90066-3030
James H Mulder; Wappingers Falls, NY 12590-3858
Lynda Majors; Blacksburg, VA 24060
Robert Frang; Santa Monica, CA 89495
Drake Pirkle; Lubbock, TX 79424
Jordan Yeatts; Moscow, ID 83843
Beth Wakefield; San Francisco, CA 94112
Kareem Talhouni; Dorchester, MA 02125
Marjorie Ann Ottenberg; Saratoga, CA 95070-3712
Andrew Fisher; Evanston, IL 60201
Janet Hagge; Salem, OR 97306
Roy Malcom; Wichita, KS 67217
Fred Saenz; Miami, FL 33189
Natalie Hanson; Lansing, MI 48917
Marjorie Moss; Del Mar, CA 92014-3823
David Grant; Medford, OR 97504-9734
Doris Howard; Reno, NV 89521
Joyce Hammack; Fort Worth, TX 76132 4023
Brian Lutenegeger; Seattle, WA 98109
Charles Prettyman; Columbus, NJ 08022-2386
Jennifer M Weishaar; Lawrence, KS 66044
Jim L. Crowle; Kent, WA 98030-8916
David Yao; Seattle, WA 98133-7700
Ramaswami Kumar; Mumbai, ot 400007
Andreas Wittenstein; Woodacre, CA 94973-0570
Seth Ehrenreich; Buffalo, NY 14207

Douglas Meyer; Las Vegas, NV 89129-2166
Steven Tengood; Philadelphia, PA 19149-1218
Jill ZamEk; Arroyo Grande, CA 93420
Francis Scalz; Scottsdale, AZ 85250-7930
Gwen O'Barr; Bastrop, TX 78602
Marc D Reynolds; Fallon, NV 89406
Sri Maddukuri; Little Ferry, NJ 07643-2023
Clifton Bain; Arroyo Hondo, NM 87513
Earl Gernert; Greenbelt, MD 20770-2049
James Tyler; Kalamazoo, MI 49009
Karen Battaglia; Pittsburgh, PA 15211
Georgia Kahn; Novato, CA 94947
David Gray; Claremont, NH 03743
Kathleen Joseph; Catasauqua, PA 18032
Eleanor Eagan; Los Angeles, CA 90049
Nicholas D Frederick; Abbeville, LA 70510
John Paul P Coakley; Valley Village, CA 91602
Kristen Osman; Upland, CA 91784
Fred Boesl; Eden, NY 14057
Lauren Verruni; Mount Pleasant Mills, PA 17853
Rose Henley; Duarte, CA 91010
Lowell Terry; High Hill, MO 63350
Rosemary Grutt; Peeachtree City, GA 30269
R.A.L. West; Silver City, NM 88062-0658
David Perlin; Prescott, AZ 86303
Athanasia Gregoriades; NY, NY 10011
Jaimey Perham; Bridgeport, CT 06604
Sandy Kucinski; Toledo, OH 43606
Twyla Meyer; Pomona, CA 91767
Anna Veraldi; San Francisco, CA 94110
Linda Webster; Minneapolis, MN 55419-5504
Betty Kuhns; Sarasota, FL 34235
Sally B Lane; London, OH 43140
Ricardo U. Berg; Los Angeles, CA 90029-3683
Maryellen Redish; Palm Springs, CA 92264
Jose Miranda; Long Beach, CA 90805
Leslie Winston; Silver Spring, MD 20904
Kristin Howard; Tesuque, NM 87574
Julie Ostoich; Sacramento, CA 95826
Lori Stefano; Yelm, WA 98597-9086
Jo Laz; Chicago, IL 60623-4824
William Schoene; Santa Monica, CA 90405
Cynthia Neal; Memphis, TN 38115
Kathleen Matthews; Setauket, NY 11733
Lori Peniche; Dallas, TX 75230
Majill Weber; Tucson, AZ 85706
John Susoreny; Hammond, IN 46327-1256
Metric Clay; Starkville, MS 39759
Maxine Ewig; Temecula, CA 92592
Sandra DeSmedt; Boonton, NJ 07005-2040
Gail Jackson; Waikoloa, HI 96738
Joseph Szabo; Los Angeles, CA 90045
Julie du Bois; West Hills, CA 91304-3049
Dennis Faulkner; Lakeside, CA 92040
Jason Bowman; Cameron Park, CA 95682-7964
Randy Morrow; Wichita, KS 62718
Candy LeBlanc; Cameron Park, CA 95682-7964
Peggy Ott; Albuquerque, NM 87108
Mary Ann A. McDonald; Sacramento, CA 95818
William Fudeman; Ithaca, NY 14850
Alice Swan; Eastsound, WA 98245
Danny King; West Palm Beach, FL 33406
John Hayes; Horseshoe Bend, AR 72512
Kathleen Kerwin; San Jose, CA 95130
David Howenstein; St. Louis, MO 63122
Janet Hays; New Orleans, LA 70117
Renata Bryant; Kent, WA 98030
Cassandra B. B. Lista; Santa Rosa, CA 95407-7710
John Kilcher; Knox, NY 12107
Ali BorabY; Toledo, OH 43609

Chuck Donegan; Selden, NY 11784
Patricia Nelson; North Yarmouth, ME 04097
Lisa Ouazzani; Beaverton, OR 97005
Maureen Hall; Rolla, MO 65401
Peter Lee; San Francisco, CA 94118-3548
Steve Parkin; cardigan, ot sa43 2jt
Christopher Boyd; Salt Point, NY 12578
Mark Deats; Nanuet, NY 10954-1050
Jim White; Tyrone, GA 30290
Dennis Ledden; Rancho Murieta, CA 95683-9451
Jennifer Rodriguez; Granbury, TX 76049
Ann Marie Lahaie; Lynn, MA 01904
Craig Simpson; Somerville, MA 02144-2225
Charles F.X. Donelan; Toms River, NJ 08753
Kristin Burch; Windsor, VT 05089
Emmett J Murphy; Bradenton, FL 34205
Joyce Van Kolken; Oceanside, CA 92058-1426
Kathleen Williams; Jamestown, RI 02835
Jim Bush; Waxahachie, TX 75165
Paul Moss; White Bear Lake, MN 55110
Irene Radke; Dania Beach, FL 33312
Todd Lee; Asheville, NC 28805
Susanne Hesse & Doug Dyer; Alachua, FL 32615
Rosemarie Kozdron; Rockton, PA 15856
Duncan Cox; Marblehead, MA 01945
Kalikolehua V Kanaele; Keaau, HI 96749
Esther Blumenthal-Sheats; Palo Alto, CA 94301
Marilyn & Tom Finnelli; Apopka, FL 32712-2055
Esther Blumenthal-Sheats; Palo Alto, CA 94301
Madeline Chaipel; Flushing, NY 11354
Paul & Carol Bradford; Orange, MA 01364-9515
Diane Lohr; South Pasadena, FL 33707
Diane Sambdman; Davenport, IA 52806
William Small; Annapolis, MD 21403
Theresa del Rosario; St. Paul, MN 55102
Sara Edwards; Lancaster, PA 17601
Carol Peterson; Lakeland, FL 33803
Barbara Komeyli; Murray, UT 84117
Alyce Douglas; Providence, RI 02908
Jerry Crawford; Clayton, NJ 08312
Wilbur Zielke; Oak Lawn, IL 60453-7105
Alan Jasper; Merrick, NY 11566
Anna Jacus; Linden, NJ 07036
Thomas Kiernan; Garwood, NJ 07027
David Cox; Gainesville, FL 32608
Patricia Phillips; Kent, OH 44240
Dagmar Federlein; Fly Creek, NY 13337
Rayleen Nunez; Boston, MA 02118-3425
Robert Meyer; Stacy, MN 55079
S C; Brecksville, OH 44141-3616
Carl Johnson; Haverhill, MA 01830-5706
Samantha Heatherly; Long Beach, CA 90815-2205
Eugenia Harris; Carlisle, MA 01741
Judith Arnold; Shelbyville, KY 40065
Anne Fleurat; Yorktown, NY 10598
Laura Herzog; Glendale, WI 53217
Scott Kimmich; Norwalk, CT 06854
J. Aaron Gordon; Chatham, MA 02633
Patricia Larson; Orange, MA 01364
Charles Reinhart; Dorchester, SC 29437
Jean Ott; Satellite Beach, FL 32937
Vicki Johnson; Kansas City, MO 64137
Suzan Bekiroglu; Weeki Wachee, FL 34607
Michael Toto; Redding, CT 06896
D. Bryan; S.S.F., CA 94080
Albert Sargis; Boston, MA 02115
Katherine N Frey; Carbondale, PA 18407
Sandra Moskovitz; Princeton, NJ 08542
Richard Katinas; Millbury, MA 01527-0734
Linda Morse; Oakham, MA 01068-9804

Barry Kesselman; Medford, MA 02155-2954
June Harrison; Long Branch, NJ 07740
Mark Leeson; Orwigsburg, PA 17961
Carol J Rothrock; Carbondale, CO 81623
Craig Clark; Cliffside Park, NJ 07010
C. Krimmelbein; Biltmore Lake, ND 28715
Jennifer Baxter; Holbrook, NY 11741
Kathryn Morgan; West Allis, WI 53227
Joyce Weir; Newport, WA 99156
John White; Mosca, CO 81146
Tori Johnston; Minneapolis, MN 55405
Fredrick Keller; Fleetwood, PA 19522-8905
Darla Reynolds-Sparks; Yukon, OK 73099
Simon Teolis; Santa Fe, NM 87506-1211
Fredrick Keller; Fleetwood, PA 19522-8905
Thomas Welton; Brookneal, VA 24528
Patrick Lallo; Newfane, VT 05345
Larry Reno; Saint Joseph, MO 64507
Lesley Cox; Carrabelle, FL 32322
Fredrick Keller; Fleetwood, PA 19522-8905
Erica Glynn; Gloucester, MA 01930
Dorothy Bennett; Detroit, MI 48227
Janet Larson; Calpella, CA 95418
Clifford D. D. Worden; Zeeland, MI 49464-8971
Tom & Lola Dillard; Arlington, TX 76016-2229
Harold D Roberts; South Bend, IN 46637
S W; Columbus, NJ 08022
Cheryl Viering; Mobile, AL 36695
Carl Gutman; Delmar, NY 12054-3408
Marion Tidwell; Merrillville, IN 46410
Beth Henry; Charlotte, NC 28205
Joel & Jane Maguire; Prudence Island, RI 02872-0204
Jean Keller; South Portland, ME 04106
Judith Burke; Branford, CT 06405
Mary Shelton; Banner Elk, NC 28604
Don Cicchelli; Sunny Isles Beach, FL 33160
Shaun M O'Connell; Staten Island, NY 10304
Charles Eisenberg; Bloomington, IN 47401
Marion Frazier; Brooklyn, NY 11221
Richard L Duncan; New York, NY 10065
Andrew T Edmonds; Grayslake, IL 60030
Dorothy Lucey; Maplewood, MO 63143
Cynthia Weehler; San Antonio, TX 78727
Barbara Percival; Garden City, KS 67846-4301
Shirley and Stanley Romaine; Great Neck, NY 11021-
Hillary G. Buckingham; Hastings on Hudson, NY 10706
Klaus Steinbrecher; Angel Fire, NM 87710
Shirley Haddad; Bainbridge, NY 13733-3206
Walden & Betty Joura; Reno, VA 89523
Jan Robbins; Stockton, NJ 08559
John Albertini; Charleston, ME 04422-3031
Seth Rutledge; Syracuse, NY 13210
Ken Wilson; Petaluma, CA 94952
Douglas Parker; Marianna, FL 32446
Frank Gannon; Demorest, GA 30535
KT Snyder; Gorham, ME 04038
Nancy Richard; Bristol, RI 02809
Ed Leary; Sun City Center, FL 33573
Cynthia Erdesohn; West Paterson, NJ 07424
Bob Thomas; Myrtle Creek, OR 97457
Shirley Lamdan; Hagerstown, MD 21742
Pat & Norm Dressler; Hanford, CA 93230
Virginia Ogbum-Matthews; Georgetown, SC 29440
Randall Esperas; Cupertino, CA 95014
Nancy Dorsey; Overland Park, KS 66212
Fred Vickers; Pearland, TX 77581
Dennis Feichtinger; Trenton, MI 48183-2830
Julie Sebenoler; Los Angeles, CA 90020
Catherine Moreno; Mill Valley, CA 94941
Leslie Harris; Mt Marion, NY 12456
John Burkett; Greenville, TX 75402
Parimala Somasundaram; Long Grove, IL 60047
Loretta Brogan; Shreveport, LA 71104
Joanna F. Welch; Escondido, CA 92025
Lopamudra Mohanty Giri; St.Peters, MO 63376
Sue Pienciak; Silver City, NM 88061
Karen Graham; Battle Creek, MI 49014
Rick McDonald; Wichita Falls, TX 76308
Jeffrey O'Dell; Beltsville, MD 20705
Michael Letendre; Portsmouth, NH 03801
Lisa Brenskelle; Houston, TX 77004
Carly Simmons; Florence, CO 81004
Dorothy Decker; Ashland, OR 97520-1400
Donna Cuthbert; Pottstown, PA 19465
Danuta Radko; Tewksburg, MA 01876
Joanne L Bartlett; Amherst, NY 14226
Sharonrae Kansas; Cheyenne, WY 82009
Paul W Garatt; Paducah, KY 42001
Thomas Cataldo; Islip terrace, NY 11752-0435
Peter D. King; Carmel valley, CA 93924
Lawrence Warner; Fishersville, VA 22939-2208
Kay Beams; Eden Prairie, MN 55347
Linda Mason; Mt Pleasant, MI 48858-1911
Joanne and Jim Fraser; Columbia, SC 29210
Debora Winn; Laguna Hills, CA 92653-1670
Margaret Murray; Englewood, CO 80110
Javier Valverde; Miami, FL 33145
Brenda Carey; Hagerstown, MD 21740
Carole Plourde; Amesbury, MA 01913
Bradley Boyden; Largo, FL 33774
Beth Cole; Astoria, NY 11106-1447
Margaret Welke; Madison, WI 53704
Yogesh Angrish; San Francisco, CA 94114
Erik Wood; Ocean, NJ 07712
Nick Krol; Acton, MA 01720
Melinda Cespedes; Sausalito, CA 94965
Paula MacDonald; Cohecton, NY 12726
Margaret Hormann; Chicago, IL 60634
Karen Schulte; Tulsa, OK 74135
Susan O'Connell; Wilmette, IL 60091
Elizabeth T. Rockwell; Rochester, NY 14617
Susan Luton; Austin, TX 78737
Bernard Saftner; Upper St. Clair, PA 15241
Kent & Marilyn Ferguson; Wayne, IL 60184
Katherine Babiak; New York, NY 10014
B Davidson; Tulsa, OK 74112
Audrey Rossa; Valrico, FL 33596
Frances Scafidi; Santa Barbara, CA 93101
Douglas David D Hagens; South Lake Tahoe, CA 96150
Tim P Jeffries; Bend, OR 97702
Jim Petkiewicz; San Jose, CA 95125
Patricia Schreiber; Lansing, IL 60438
Susan Singh; Tulsa, OK 74105
Rochelle Becker; San Luis Obispo, CA
Margaret T.M. Petkiewicz; San Jose, CA 95125
John J Lally; Croton on Hudson, NY 10520
Carol Davis; SLC, UT 84117
Christy Boyle; Alpha, NJ 08865
Jack Runnels; Nashville, TN 37219
Patricia St August; Okanogan, WA 98840
Bardia Behabadi; Pasadena, CA 91101
Rita Surdi; Las Vegas, NM 87701
Matt Bradley; Mt. Prospect, IL 60056
John L Champine; Sarasota, FL 34241
Karen Hudson; Elmwood, IL 61529
Brian Lockhart; Portland, OR 97213
Linda Schmit; Stone Lake, WI 54876
Mynka Draper; LA, CA 90042
Andrew Sutphin; Woodland Hills, CA 91367
Betty Walters; Boulder, CO 80302-9777

John Butts; Bigfork, MT 59911
Cynthia Piper; North Olmsted, OH 44491
Bob Schulof; Brooklyn, NY 11201
Peggy Sakach; Austin, TX 78733
William P. White; Bryn Mawr, PA 19010-3110
Marguerite Winkel; Spokane, WA 99201
David Sherman; Santa Rosa, CA 95405
Andy McNutt; Boulder, CO 80301
Marcia Kelce; Albuquerque, NM 87108-2955
Deborah Burnett; Goldsboro, NC 27530-4802
Clare Pelkey; Windsor, NC 13865-2717
Edward Rengers; Woodstock, NY 12498
Gil Jordan; Coram, MT 59913
Phillip Joyner; Kenmore, WA 98028
Lee and Charlotte Terbot; Cave City, AR 72521
Muriel Shickman; Peyton, CO 80831
Roberta Zur; S. Freeport, ME 04078
Lisa Piner; Costa Mesa, CA 92626
Roberta Siemerling; Lakewood, NJ 08701
Frances Mac Donald; Old Orchard Beach, ME 04064
Anna Price; East Liverpool, OH 43920
Alyssa Aliverto; Clark, NJ 07066
Lana Lasley; Arlington, WA 98223
Theresa Ciavarella; Altoona, PA 16602
Curtis DeMartini; Pacifica, CA 94044
Irvin Smith; Tioga, PA 16946 8630
Frederick H. Forschler; Elk Grove, CA 95624-2330
Merian Soto; Philadelphia, PA 19119
Carroll C Graham; Richmond, VA 23229
Bev Wruck; Eden Prairie, MN 55346
Frederick Holzer; New York, NY 10022
Carol Board; Roswell, NM 88203
Barry Parsons; Madison, FL 32340
Annette Bigler; Lexington, KY 40504
Michael Grello; West Columbia, SC 29170
Regina Minniss; Baltimore, MD 21201
Licia Fields; Brewster, MA 02631
Patricia A McHugh; St. Louis, MO 63130-2330
Jack McClain; Sacramento, CA 95812
Beatrice Virga; Tracy, CA 95377
Neahle Madden; Santa Rosa, CA 95405
Catherine M. M Holtkamp; Melbourne, KY 41059-9602
Debra Eades; Greenville, SC 29605
Deborah Fitzgerald; Bridgewater, NJ 08807
Josh Hobbs; Cape Canaveral, FL 32920
Mike Smith; Seattle, WA 98101
Danila Oder; Los Angeles, CA 90020-3562
Jonathan Nash; New York, NY 10028
Klaus Schreyack; Redondo Beach, CA 90278-4521
Nancy Ashley; New York, NY 10024
Helen Greer; Tucson, AZ 85705-1465
Robin Simpson; Budd Lake, NJ 07828
Judith L'Heureux; New Rochelle, NY 10805
David Greene; Columbus, OH 43209
Alisa Guys; Fairfield, CT 06825
Delfina Pei; Houston, TX 77031
Thomas Broome; Townsend, GA 31331
Elisabeth Hair; Charlotte, NC 28207
Bettie Reina; Millmay, NJ 08340
Jon Corlett; Lakeland, FL 33810
John Gozdziński; St. Louis, MO 63138
Ethel O Walker; Tucson, AZ 85741
Delores Harrower; Burton, MI 48529
Diane Schrack; Highlands Ranch, CO 80126
H.K. Peters, Jr.; West Grove, PA 19390
Rich Wentzel; Edgar, WI 54426
Bob B; Bryantville, MA 02327
Jon Curto Jr.; Dunedin, FL 34698
Mary Anne Connell; Palmerston, ON N0G 2P0
Anneke DeLuycker; Indianapolis, IN 46254

Laura Silverman; West Nyack, NY 10994-2116
Glenna Mayer; Jupiter, FL 33458
Richard N. Huff; Fort Wayne, IN 46815-7335
Mrs Richard N R Huff; Fort Wayne, IN 46815-7335
Lenore Fenn; Lexington, MA 02421
David Cayford; Santa Rosa, CA 95401
Fran Good Medicine Wolf Klabunde; Beaverton, OR
Wm Schultz; Whitefish, MT 59937
Julie Fergusson; Falls Church, VA 22043
Christina Conroy; New York, NY 10011-7922
Kathleen Tepper; Norwalk, CT 06854
Luci Ungar; Sonoma, CA 95476
Lynne Banta; Los Angeles, CA 90042-1615
Randy Tashjian; Glendale, CA 91207
Kimberly Peterson; Cloverdale, CA 95425
Molly Perkins Hauck; Kensington, MD 20895-3812
Victoria Usher; Glastonbury, CT 06033-3317
Darren Albertson; Toulon, IL 61483
Jessica Garland; Kalamazoo, MI 49009
Susan Pelakh; Cocoa Beach, FL 32931
Neil Stecker; Tamarack, MN 55787
Deborah Fitzgerald; Bridgewater, NJ 08807
Dini Schut; Toledo, OH 43606
Kathryn Rose; Denver, CO 80205
Judi Merl; Wellfleet, MA 02667-0196
J. Roberts; Portland, OR 97220-1755
Yala Korwin; Flushing, NY 11367-3125
Ethel Leider; W. Palm Beach, FL 33417
Keval Kaur Khalsa; Durham, NC 27707
Angela Cobb; Madison Township, PA 18444
Barbara Hodgkinson; Santa Rosa, CA 95409
Terry O'Brien; Bel Air, MD 21015
Dottie Miller; Boynton Beach, FL 33437
Laura DePreta; Stamford, CT 06903
Martha Schwartz; Santa Cruz, CA 95060
Ronald Brown; Longmont, CO 80501-5504
Marla Bottesch; Norridgewock, ME 04957
Anthony Arcure; Fresno, CA 93722
J. Gregory Twain; Portland, OR 97214-4226
Rita Sammons; Lakewood, NJ 08701
Mary Jo Carey; El Prado, NM 87529
Mary Ann West; Purcellville, VA 20132
Rebeca Torres Rose; Troy, NY 12180
Mary Schor; Bethesda, MD 20817
Michael Lewis; Tucson, AZ 85730
Ralph Werner; Escondido, CA 92025-6612
Ron Chew; Oak Park, IL 60302
Bruce Leier; Minneapolis, MN 55407
Megan Montes; Palm Desert, CA 92260
Holly Williams; Lancaster, PA 17603
Mike Carr LaPorte; Portland, OR 97223
Laura Williams; Albuquerque, NM 87122
Dorian Brooks; Arlington, MA 02476
Joshua Stein; San Francisco, CA 94117
Elena Lemmo; Massillon, OH 44646
Patricia English; Hamptonville, NC 27020
Jane Hardy; Watertown, MA 02472
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Christine LeBeau; New York, NY 10021
Cheri Hron; West Bend, WI 53095
Sandra Brown; Rio Rancho, NM 87144
Sharon Gillespie; Austin, TX 78703
Joan M Murphy; Arvada, CO 80005
Cindy Borske; Mason City, IA 50401
Estrella Quiroga; Whitethorn, CA 95589
Yuka Honda; Clinton, NY 13323
Francis (Kiko) Harrison; Eastsound, WA 98245
Rachel Jordan; Eugene, OR 97405
Midgene Spatz; Las Vegas, NV 89144-1334
P D Barbuto; Kent, OH 44240

Betty Persson; Oakhurst, CA 93644
Rashideh Salameh; Hingham, MA 02043
Julie Owen; Berkeley, CA 94707
Emily Hersh; Austin, TX 78758
Lynn P. Gale Esq.; Maplewood, NJ 07040
Patricia L. Lent; Royal Oak, MI 48067
Paul Hawkins; Brevard, NC 28712
Walter L. Bradley Jr; Pittsfield, MA 01201-7428
Larry Herman; Sun Valley, NV 89433-7029
Joseph Fratantoni; Spring City, PA 19475
Delia Carroll; Chestertown, NY 12817
Dorothea DiCecco; Litchfield, CT 05659
Phillipa Vaz; Toronto, ON M4C 5L6
Carol Hammel; Fullerton, CA 92833-3716
Violet B. Osmun; Nazareth, PA 18064
Wayne Pipke; Rocky Hill, CT 06067
Julie Spickler; Menlo Park, CA 94025
Anne Wolf; Santa Rosa, CA 95405
Joan Mitchell; Hermitage, TN 37076
Frances C Moore; Bellevue, NE 68123
Lola Bice; San Francisco, CA 94131
Travis Edgar; Watertown, SD 57201
Hermeine Ehlers; Brookfield, WI 53005
Richard Kilgian; Lapeer, MI 48446
Joan Flynn; Rockaway Park, NY 11694
Debbie Sequichie-Kerchee; Cache, OK 73527
Miguel Gutierrez; Santa Maria, CA 93454
Graham Gardner; Providence, RI 02906
Peggy P. Boyd; Baldwinville, NY 13027
Danielle Masek; Lisle, IL 60532
Davinder Bhamra; Freehold, NJ 07728
Megan Rice; Las Vegas, NV 89106
Signe and Joe Stuart; Santa Fe, NM 87508
George Dean Patterson; Elkins, AR 72727
Kathy Danielkebir; Everett, MA 02149
Elizabeth Ortlieb; Murfreesboro, TN 37128
Julie Castle; Huntington, NY 11743-2830
Michelle Lerner; Flanders, NJ 07836
Allie Bohm; Hastings-on-Hudson, NY 10706
Stephen Molk; Columbus, OH 43202
Leah Goering; Florissant, MO 63034
Lucy Gibson; Madison, WI 53716
Harriet Crews; Flushing, NY 11355
Shirley Reese; Billings, MT 59102-5668
Christina Strother; Manteno, IL 60950
Margaret Clay; Clayton, ID 83227-9701
Beverly Miller; Haslett, MI 48840
Brian Krysinski; Minneapolis, MN 55405
Jared Eaton; Kapaau, HI 96755
John Estes; Birmingham, AL 35213-2127
Walter L. Bradley III; Pittsfield, MA 01201-6302
Todd Aldrich; Ft. Meade, MD 20755
Robert Wagner; Lawrenceville, GA 30044
Mary Ann A Kirsling; Pasco, WA 99302
Rudy Hernandez; St. Joseph, MO 64501
Dini Schut; Toledo, OH 43606
Tina Clarke; Amherst, MA 01002
Mike Mullarkey; Tucson, AZ 85701
Melissa Judge; Tampa, FL 33607
Todd Witek; Driggs, ID 83422
Jolia Koo; Oakland, CA 94602
Lon Hope; Toronto, ON m4x119
Timothy Marsh; Walnut, CA 91789-2203
Phyllis Pivo; Ventura, CA 93003
Sean Magee; Portland, OR 97229
Mary Fitzgerald; Simi Valley, CA 93065
Tom Fleming; Fort Collins, CO 80524
Mildred B; Asbury, MO 64832-8132
Don Kelley; Deadwood, SD 57732
Ian C Cree; San Francisco, CA 94110

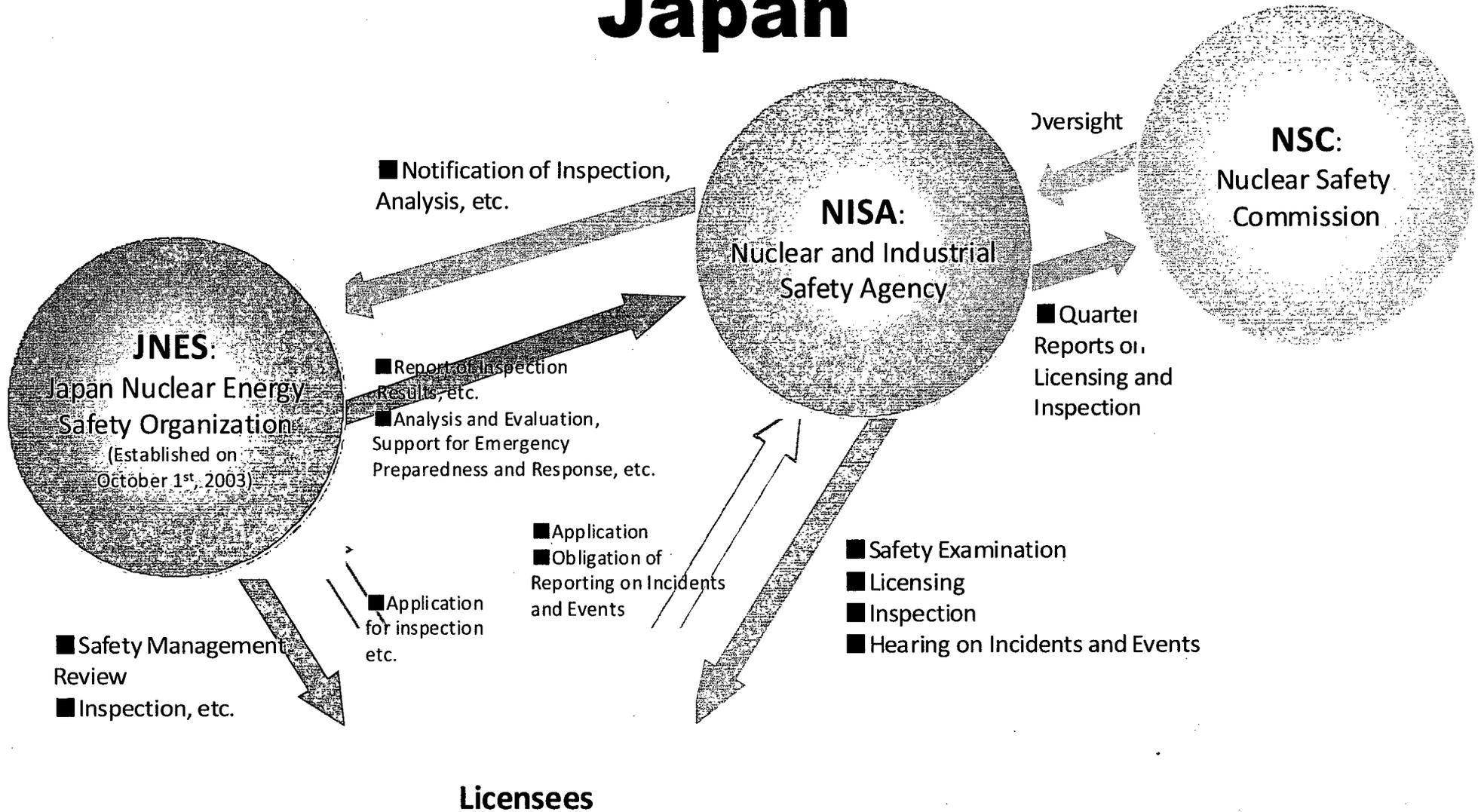
Judy Coleman; Omaha, NE 68106
Fred Strickland; Fayetteville, GA 30214
Dean Monroe; N Hollywood, CA 91601-3356
Mary Ann Dougherty; Lake Oswego, OR 97034
Bruce Wheeler; Pooler, GA 31322-8200
Eric Wagner; Harleysville, PA 19438
David L Bonnell; Dallas, TX 75234
Peter Mitchell; Rochester, NY 14607-2945
Katie Franklin; Los Osos, CA 93402
Jessica Miller; Moorhead, MN 56560
Lee Cali; Cottonwood, AZ 86326-5023
Mary Vought; Salinas, CA 93906
Rebecca Upchurch; Leander, TX 78641
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Karen Larsen; Littleton, CO 80120-3815
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Gigi-Karen Lawrence; Grapevine, TX 76054
Tamah Lettieri; Deerfield Beach, FL 33442-6050
Danny Dyche; Hillsboro, OR 97123
Keith McElroy; Chelmsford, MA 01863
Michael Balsai; Philadelphia, PA 19102
John Boyce; Oviedo, FL 32766
Gene Soleim; Grand Forks, ND 58201
Robert A. Daly; Glen Burnie, MD 21060-7398
C. Huti Reynolds; Porum, OK 74455
Mark Cosgriff; Lakewood, OH 44107
Carol Swanson; Ansonia, CT 06401
Angela Bradley; Port Angeles, WA 98363
Curtis Bradley; Port Angeles, WA 98363
Ruth Stambaugh; Black Mountain, NC 28711
Sabrina Eckles; Lubbock, TX 79416
Frank Colletto; Simi Valley, CA 93063
Donna Charter; Arlington, TX 76011
Benjamin Below; Harpswell, ME 04079
George Lloyd; Placerville, CA 95667
Karl Bronk; South Hamilton, MA 01982
Carol Broderick; Chicago, IL 60645
Corinne Livesay; White Bear Lake, MN 55110
Paul Merkel; Ballwin, MO 63011
Marcia Bailey; Burnsville, NC 28714
Susan Hanway Scott; Kennett Square, PA 19348
Marie Overall; Salt Lake City, UT 84106
Gerald and Louise Rose Blume; Clermont, GA 30527
Diane Faircloth; Hartly, DE 19953
Joan Gugerty; Baldwin, MD 21013
Jennifer Valentine; Massapequa Park, NY 11762
Lisa Petrie; Carolina, RI 02812
Robert Lincoln; Rutland, VT 05701
Dawn Wolfson; El Dorado Hills, CA 95762
Dorothy Monsterleet-Galaz; West Covina, CA 91792
Gene W. W Waggoner II; Pinon Hills, CA 92372
Cha Smith; Honolulu, HI 96816
Susan Spengler; Palatine, IL 60074
Marilyn Skolnick; Monroeville, PA 15146
Gay Cheney; Browns Summit, NC 27214
Michael H. Seacat; Georgetown, IN 47122
Jeff Bush; Silver Springs, NY 14550
Sharon Mikulich; Chicago, IL 60637
Grecia Perez; La Puenete, CA 91744
Judith Hamburg; Seabrook, MD 20706
Kathryn Roberg; Spokane, WA 99202
Keith Edwards; Windsor, NC 27983
Harriet Van Buren; Vashon, WA 98070
Sharon Schultz; Buffalo, NY 14202

Francis Raber; Steubenville, OH 43952
Kathleen & Wayne Krevetski; Rutland, VT 05701
Joan Zawaski; Oakland, CA 94602
Dianne Miller; San Diego, CA 92103
George Lewandowski; Lansing, IL 60438
Janet Hockenber; Henderson, NV 89052
Mary Cushing; Harwich, MA 02645-2857
Mike Antone; Sacaton, AZ 85247
Sylvia Pratt; Newkirk, OK 74647
Michael Quinn; Burbank, CA 91502
Joseph and Diane Williams; Lacey, WA 98503
B. Jean Oatman; Enid, OK 73701-5207
John Honnette; Kingsburg, CA 93631-1110
Daniel Cuesta; Ontario, CA 91761
Larry Scrima; Aurora, CO 80012
Steve Walworth; La Crescenta, CA 91214
Meredith Donahue; Philadelphia, PA 19147-6516
Tammy Ambler; Cleveland, TX 77327
Patricia van Betten; Blue Diamond, NV 89004
Archie Burke; Moonee Ponds, AP 03039
Jessica Rocheleau; Maple Grove, MN 55369
Junyan Li; Hacienda Heights, CA 91745
Megan Mooha; IL, IL 60660; Algonac, MI 48001
Frida Bani; Port Vila, ot 678
Daniel M Lips; Hauppauge, NY 11788
Michael Morrey; Puyallup, WA 98375
Naomi Wynne; Hawthorne, CA 90250
Dorie Crystle; San Francisco, CA 94109
Mary Anne Gaskins; Centennial, CO 80112-2632
Jeffrey Apfelberg; Los Angeles, CA 90049
Erv Amdahl; Sierra Vista, AZ 85650
Mindelynn Castro; La Puente, CA 91744
Susanna Sorin; Artesia, CA 90701
Joe Salazar; Santa Rosa, CA 95407
Jackee Goforth; Henderson, NV 89002
Seth Shulman; Webster, NY 14580-1046
David N Reagan; Hot Springs, AR 71901
Karen Themelis; Lowell, MA 01850
Deborah Cohen; Saint Louis, MO 63116
Ellen Poist; Philadelphia, PA 19118
Paul Slapinski; Springfield, MO 65806
Joyce Long; Huntington, NY 11743
Betty Ford; Midlothian, VA 23114
Dan Meier; Cedar Falls, IA 50613
Steven Gilbert; New York, NY 10002
Ramon Pineda; Rowland Heights, CA 91748
Lauren Kramer; Macungie, PA 18062
Robert Castillo; Placentia, CA 92870
Dana Bleckinger; Portland, OR 97219
Fred E Patterson; Portales, NM 88130-9505
Janet Wolf-Eshe, Corvallis, OR

JNES ACTIVITIES: SPENT FUEL INTERIM STORAGE AND GEOLOGICAL DISPOSAL

**Hidehiko Yamachika – General Manager
Japan Nuclear Energy Safety Organization
(JNES)
Washington Office**

Safety Regulation System in Japan



Major Programs of JNES (1)

- **Inspection of nuclear power plants and nuclear facilities**
- **Analysis and evaluation of safety on nuclear power plants and nuclear facilities**
- **Activities for nuclear emergency preparedness and response**

Major Programs of JNES (2)

- **Investigation, tests and research to ensure nuclear safety in the framework of utilizing energy**
- **Collection, compilation and supply of information to ensure safety in the framework of utilizing energy**

Management of Spent Fuel in Japan

- **Spent fuel is reprocessed. HLW disposed of at geological disposal site. Spent fuel interim storage situation:**
 - **Spent fuel generation from NPPs:
13,500 tU in 10 years**
 - **Rokkasho reprocessing capacity:
800 tU/year**
 - **Additional storage requirement:
7,100 tU**

Spent Fuel Interim Storage Facility in Japan (1)

- **Mutsu Interim Spent Fuel Storage Facility (Recyclable-Fuel Storage Center)**
 - **Metal cask**
 - **Capability: 3,000tU initially; increasing to 5,000tU**
 - **Approval of License application: May 13, 2010**
 - **Groundbreaking: July 2010 (business plan)**

Spent Fuel Interim Storage Facility in Japan (2)

- **Mutsu facility (continued)**
 - **Operation starts: July 2012 (business plan)**
 - **Storage period: 50 yrs (business plan)**
- **Regulator safety review confirmed that licensee selected a reliable material that meets safety performance requirements against material degradation for the design basis storage period.**

Research on Cask Safety, Spent Fuel Integrity During Storage (1)

JNES examinations show that metal cask material and spent fuel do not become depleted affecting safety for 40 – 60 years:

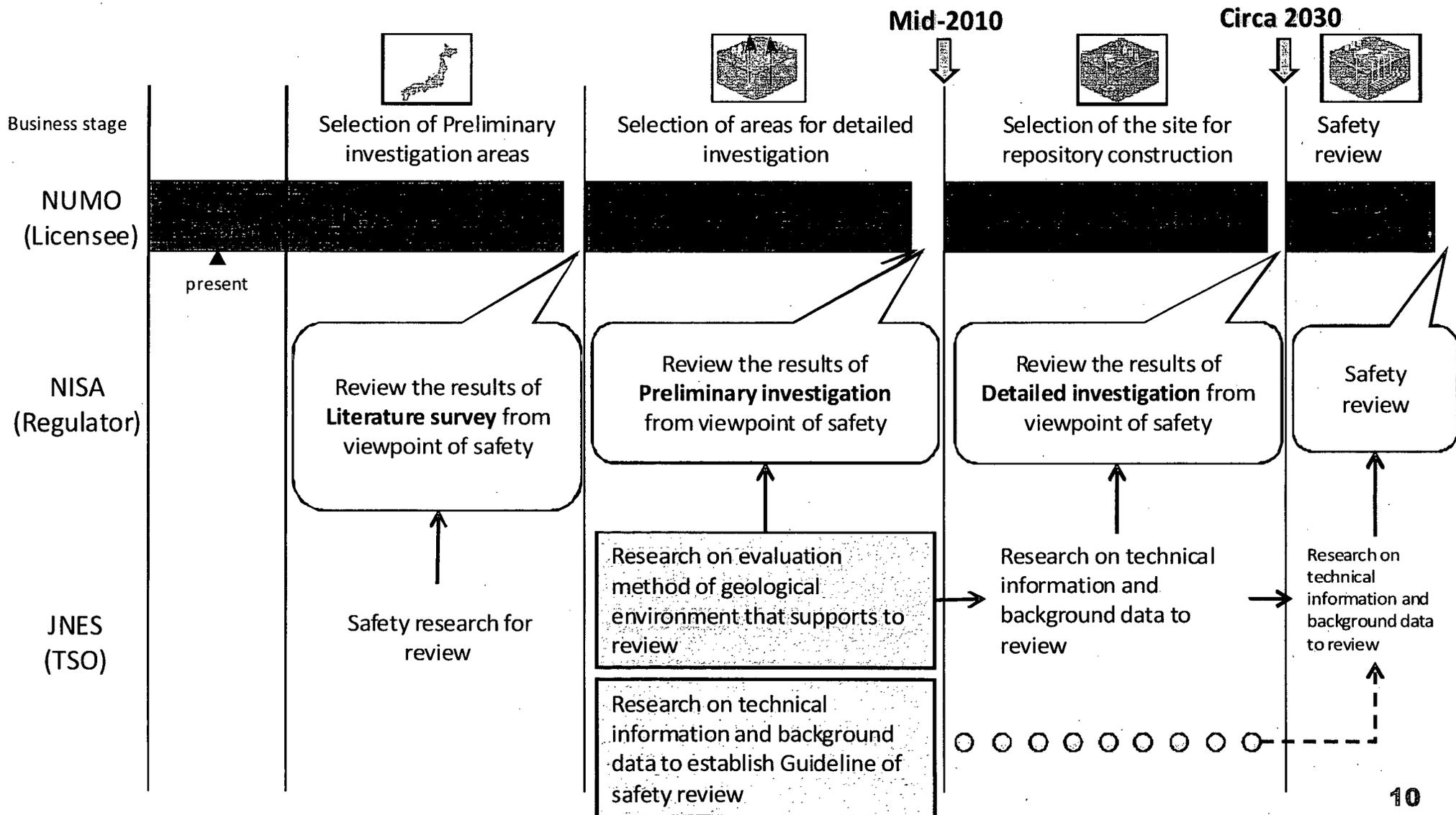
- Neutron shielding materials for Epoxy resin & Silicon resin**
- Material property metal gasket for lid Confinement**
- 9m drop tests for lid containment behavior and seal performance**

Cask, Spent Fuel Integrity Research (2)

JNES examinations (continued):

- **Thermal tests for lid containment behavior and seal performance**
- **Fuel integrity tests**
 - **Thermal creep**
 - **Hydride reorientation**
 - **Irradiation hardening recovery**

Regulator Oversight – Geological Disposal Program



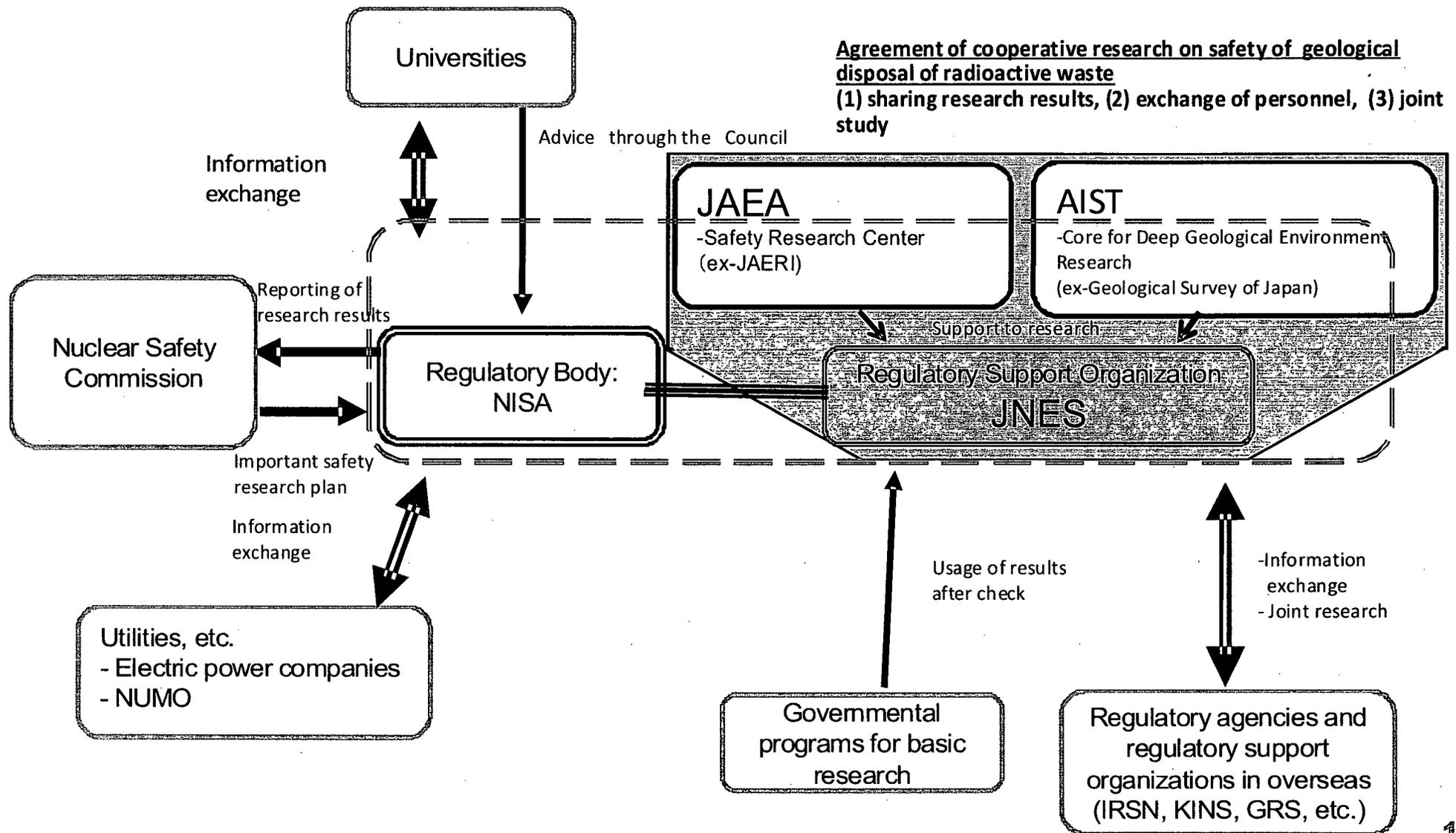
Regulatory Supporting Research in Geological Disposal (1)

- **Research on evaluation method of geological environment that supports to review the results of preliminary investigation from viewpoint of safety**
 - **Natural Events (faulting, volcanic/magmatic activities, etc.)**
 - **Geological environment (geology, hydrology, etc.)**

Regulatory Supporting Research in Geological Disposal (2)

- **Research on technical information and background data to establish Guideline of safety review**
 - **Evaluation method of geological environment and behavior of natural barrier and engineered barrier system**
 - **Evaluation method of safety assessment**

Organizational Framework: Geological Disposal Safety Research



For the Future ...

- **We hope to have a cooperative safety research agreement in the field of radioactive waste management with NRC under the NRC-NISA framework agreement.**
- **In particular, we hope to exchange information on long-term safety.**

Acronyms

- **AIST** **National Institute of Advanced Industrial Science and Technology**
- **GRS** **Gesellschaft für Anlagen- und Reaktorsicherheit**
- **IRSN** **Institut de Radioprotection et de Sûreté Nucléaire**
- **JAEA** **Japan Atomic Energy Agency**
- **JNES** **Japan Nuclear Energy Safety Organization**
- **KINS** **Korea Institute of Nuclear Safety**
- **NISA** **Nuclear and Industrial Safety Agency**
- **NSC** **Nuclear Safety Commission**
- **NUMO** **Nuclear Waste Management Organization of Japan**
- **TSO** **Technical support organization**