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Georgia Public Service Commission

(404) 463-6526
(800) 282-5813

244 Washington Street, SW
Atlanta, GA 30334-5701

FAX: (404) 463-6532
www.psc.state.ga.us

DOCKET#	Docket No. 37066
DOCUMENT#	162999

City of Lumpkin Gas Department
P. O. Box 278
Lumpkin, GA 31815

FILED
APR 07 2016
EXECUTIVE SECRETARY
G.P.S.C.

Certified Mail

Regular Mail

Attention: Mr. Randy Butts

On January 6, 2016, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered LB16-003 is provided for your information and file.

In conjunction with this inspection report, Staff has recommended the following enforcement(s):

Enforcement Action:

- Notice of Probable Violation
- Notice of Probable Violation with Proposed Civil Penalty
- Notice of Amendment

Enforcement Letter:

- Warning Letter
- Letter of Concern

Enforcement Notification:

- Observed Issue
- No Violation

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Actions, Enforcement Letters, and Notifications Issued by the Georgia Public Service Commission. Please refer to Docket No. 37066 in your response.

Please let me know if there are any questions concerning this report at (404) 463-6526 or michellet@psc.state.ga.us. Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

Michelle L. Thebert
Director, Office of Pipeline Safety/Facilities Protection

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: LB16-003

OPERATOR: City of Lumpkin Gas Department

INVESTIGATOR: Lynn Buffington

INSPECTION DATE: January 6, 2016

REPORT MAILED DATE: March 22, 2016

Any questions concerning this report may be directed to the above address or by telephoning (404) 463-6526.

1. PURPOSE OF INSPECTION

To conduct a Drug and Alcohol inspection on the City of Lumpkin for compliance with the minimum federal safety standards.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.455	External corrosion control: Buried or submerged pipelines installed after July 31	LB10-047	5/4/2010
192.13(c)	Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and...	DJ15-012	3/24/2015

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
199.101	Anti-Drug Plan	LB16-003	1/6/2016
199.117	Recordkeeping	LB16-003	1/6/2016
199.105	Random Drug Test.	LB16-003	1/6/2016
40.33	What training requirements must a collector meet?	LB16-003	1/6/2016
40.73(c)	As a collector or collection site, you must ensure that each specimen you collect is shipped to...	LB16-003	1/6/2016
40.67(d)(2)	As the collector, you must explain to the employee the reason, if known, under this part for a...	LB16-003	1/6/2016
40.67(g)	As the collector, you must ensure that the observer is the same gender as the employee. You must...	LB16-003	1/6/2016
40.11	What are the general responsibilities of employers under this regulation?	LB16-003	1/6/2016

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF LUMPKIN / DRUG AND ALCOHOL INSPECTION
INSPECTION NUMBER LB16-003 / DOCKET NUMBER 37066

On January 6, 2016 Commission Staff conducted a Drug and Alcohol inspection on the City of Lumpkin for compliance with the minimum federal safety standards.

During the inspection, the Operator was represented by:

Randy Butts - City Manager

Randy Howard - Interim Chief of Police / Designated Employee Representative (DER)

Chris Welborn - MGAG/SRCS (Consultant)

Commission Staff was represented by:

Lynn Buffington - Lead Inspector

Daphne Jones - Pipeline Safety Inspector

Jeff Baggett - Supervisor, Facilities Protection Unit

At the time of this inspection, the City of Lumpkin had two previously existing probable violations. These violations will be addressed in a follow up inspection under number DJ16-002.

NOTICE OF PROBABLE VIOLATION

As a result of this inspection Staff found that the City of Lumpkin was in probable violation of the minimum federal safety standards; specifically:

- 1) 49CFR §199.101 Anti-Drug Plan
 - (a) Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures. The plan must contain -
 - (1) Methods and procedures for compliance with all the requirements of this part, including the employee assistance program;

COMMENTS: Under the City of Lumpkin's Anti-Drug plan, which was in effect during December 2015, there are procedures for conducting random drug testing and for performing drug testing based on reasonable cause. During this inspection Staff found that the Operators former DER terminated an employee for violating the City of Lumpkin's anti-drug policy; however, the termination was based on the results of an improperly conducted drug test. Staff also found that the Operators policy did not allow termination for violations of their anti-drug and alcohol program and offers a return-to-duty process.

PROBABLE VIOLATION: The City of Lumpkin failed to follow their written anti-drug plan.

- 2) 49CFR §199.105(d) - Testing Based On Reasonable Cause. Each operator shall drug test each employee when there is reasonable cause to believe the employee is using a prohibited drug. The decision to test must be based on a reasonable and articulable belief that the employee is using a prohibited drug on the basis of specific, contemporaneous physical, behavioral, or performance indicators of probable drug use. At least two of the employee's supervisors, one of whom is trained in detection of the possible symptoms of drug use, shall

CITY OF LUMPKIN / DRUG AND ALCOHOL INSPECTION
INSPECTION NUMBER LB16-003 / DOCKET NUMBER 37066

substantiate and concur in the decision to test an employee. The concurrence between the two supervisors may be by telephone. However, in the case of operators with 50 or fewer employees subject to testing under this part, only one supervisor of the employee trained in detecting possible drug use symptoms shall substantiate the decision to test.

COMMENTS: Under the City of Lumpkin's Anti-Drug plan, which was in effect during December 2015, it provided procedures for performing random and reasonable cause drug testing. During this inspection Staff found that at some point after the random testing which was conducted on December 7, 2015 the Operators former DER was notified by their collection site that there was a problem with the provided specimens. On December 21, 2015 the Operators former DER instructed the individuals to return to the collection site and provide another specimen. Because the employees had completed the random testing process on December 7, 2015 this second test could not have been a random test under §199.105(c). Staff found no records to indicate that the Operators former DER made a determination of reasonable cause requiring a test under §199.105(d) or their drug plan.

PROBABLE VIOLATION: The Operator performed a drug test of a covered employee in violation of the requirements under 49CFR §199.105(d) and their established anti-drug plan.

- 3) 49CFR §40.73(c) - As a collector or collection site, you must ensure that each specimen you collect is shipped to a laboratory as quickly as possible, but in any case within 24 hours or during the next business day.

COMMENTS: On Dec 7, 2015 covered employees for the City of Lumpkin were notified, reported to the directed testing site, and provided urine specimens as required under the Operators drug testing program. During this inspection Staff interviewed the Operators Collector who advised that these specimens were never submitted for testing as required under §40.73(c).

PROBABLE VIOLATION: The Operators contractor for urine specimen collection failed to ship specimens for testing as required under §40.73(c).

- 4) 49CFR §40.67(d)(2) - As the collector, you must explain to the employee the reason, if known, under this part for a directly observed collection under paragraphs (c)(1) through (3) of this section.

COMMENTS: During this inspection Staff reviewed documentation provided by the collection site which indicated that a random test collection was conducted under direct observation. When Staff questioned the Collector about the reason for the direct observation they were advised that this was the way she performed all of her collections.

PROBABLE VIOLATION: The Operators urine collector personnel are performing directly observed collections in violation of the requirements under §40.67(d)(2).

- 5) 49CFR §40.67(g) - As the collector, you must ensure that the observer is the same gender as the employee. You must never permit an opposite gender person to act as the observer. The observer can be a different person from the collector and need not be a qualified collector.

COMMENTS: During this inspection Staff reviewed documentation provided by the collection site which indicated that the collection was conducted under direct observation, by an observer of the opposite gender.

PROBABLE VIOLATION: The Operators collection site is performing directly observed collections in violation of the requirements under §40.67(g).

WARNING LETTER

- 1) 49CFR §40.11 - What are the general responsibilities of employers under this regulation?
- (a) As an employer, you are responsible for meeting all applicable requirements and procedures of this part.
 - (b) You are responsible for all actions of your officials, representatives, and agents (including service agents) in carrying out the requirements of the DOT agency regulations.

COMMENTS: During this inspection Staff found that the Operators former DER and Collector failed to follow the procedures under their Anti-drug Plan for compliance with the requirements under 49CFR Parts 40 and 199.

PROBABLE VIOLATION: The City of Lumpkin failed to ensure that their officials, representatives, and agents carried out their requirements in accordance with the DOT and PHMSA requirements.

- 2) 49CFR 199.117(a) Each operator shall keep the following records for the periods specified and permit access to the records as provided by paragraph (b) of this section:
- (1) Records that demonstrate the collection process conforms to this part must be kept for at least 3 years.
 - (2) Records of employee drug test that indicate a verified positive result, records that demonstrate compliance with the recommendations of a substance abuse professional, and MIS annual report data shall be maintained for a minimum of five years.
 - (3) Records of employee drug test results that show employees passed a drug test must be kept for at least 1 year.
 - (4) Records confirming that supervisors and employees have been trained as required by this part must be kept for at least 3 years.

PROBABLE VIOLATION: The City of Lumpkin failed to maintain records demonstrating compliance with the requirements of 49CFR §199.117(a).

3) 49CFR §40.33 - What training requirements must a collector meet?

- (g) Documentation. You must maintain documentation showing that you currently meet all requirements of this section. You must provide this documentation on request to DOT agency representatives and to employers and C/TPAs who are using or negotiating to use your services.

PROBABLE VIOLATION: During this inspection the Operator was unable to produce documentation which demonstrated that their collector currently meets all requirements under §40.33

LETTER OF CONCERN

1) 49CFR 40.333(c) - You must maintain the records in a location with controlled access.

STAFFS CONCERN: Staff advised the Operator that access to records which are required to be maintained under §199.117(a) must be maintained in a location with controlled access, and that the release of these records is subject to the provisions of 49CFR Part 40, SubPart P.

2) 49CFR §199.103 Use of persons who fail or refuse a drug test.

- (a) An operator may not knowingly use as an employee any person who -
- (1) Fails a drug test required by this part and the medical review officer makes a determination under DOT Procedures; or
 - (2) Refuses to take a drug test required by this part.
- (b) Paragraph (a)(1) of this section does not apply to a person who has -
- (1) Passed a drug test under DOT Procedures;
 - (2) Been considered by the medical review officer in accordance with DOT Procedures and been determined by a substance abuse professional to have successfully completed required education or treatment; and
 - (3) Not failed a drug test required by this part after returning to duty.

STAFFS CONCERN: Staff advised the Operator of their requirement to ensure that they do not use a person who has failed, or refuses a drug test to perform any safety sensitive functions until they have completed the return-to-duty process under 40CFR Part 40, SubPart O.

PROPOSED CIVIL PENALTY

Under Commission Rule 515-9-1.01, by virtue of the authority vested in the Commission by law and pursuant to orders issued by the Commission on May 4, 1967, July 6, 1967, April 23, 1968, and October 29, 1970, all Rules and Regulations prescribed by the United States Department of Transportation applicable to the "Transportation of Natural and Other Gas by Pipeline: Minimum Safety Standards" (C.F.R. 49, Parts 191 and 192) are by this Rule made the Rules and

CITY OF LUMPKIN / DRUG AND ALCOHOL INSPECTION
INSPECTION NUMBER LB16-003 / DOCKET NUMBER 37066

Regulations of the Georgia Public Service Commission for the safe installation and operation of all natural gas transmission and distribution facilities by companies subject to the jurisdiction of the Commission within this State.

Under Commission Rule 515-9-3-.08 (Written Formal Notice of Violation), the Commission may propose a civil penalty in conjunction with this notice of probable violation. Further, the City of Lumpkin is subject to civil penalties under O.C.G.A. § 46-2-91 for violation of any Commission Order or Statute or Rule administered by the Commission. As provided by law, civil penalties can be assessed in the amount of \$15,000.00 for the first day of each violation and \$10,000.00 per violation/per day that each such violation continues.

Staff has reviewed the circumstances surrounding this incident and has recommended the following civil penalties. Please note that this recommended amount is less than the amount authorized by Georgia law.

Item	Code	Requirement	Proposed Penalty
1	§199.101(a)	Anti-drug plan	\$2,500
2	§199.405(d)	Testing on reasonable cause	\$2,500
3	§40.73(c)	Shipping of samples	\$2,500
3	§40.67(d)(2)	Direct Observation Procedures	\$2,500
4	§40.67(g)	Direct Observation Personnel	\$2,500
TOTAL PROPOSED CIVIL PENALTY			\$12,500

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Letters Issued by the Georgia Public Service Commission.

Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director

Commission Rules 515-9-3-.09 and .10 provide the options available to respond when an Enforcement Letter is issued by the Facilities Protection Unit Director/Pipeline Safety Director (Director) of the Georgia Public Service Commission ("Commission"). The following information provides natural gas operators with general information, the process for responding to said Enforcement Letters, and procedures for requesting a hearing.

For all written responses or any other official correspondence, the Operator shall file the response at the following address:

Mr. Reece McAlister, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334

The Operator must file **five (5)** copies of any response and/or official correspondence, as well as a CD with an electronic version of the response in Microsoft Word and/or a PDF, if applicable.

I. General Information Regarding Enforcement Actions, Enforcement Letters, and Notifications Issued by the Commission

A. Enforcement Actions:

1. Notice of Probable Violation (NOPV)-The purpose of this enforcement action is to document and to provide notice concerning any probable violations of a rule or regulation. A NOPV may or may not contain a proposed civil penalty.
2. Notice of Amendment (NOA)-The purpose of this enforcement action is to document and to provide notice concerning a required plan amendment for an Operator.

Enforcement Actions require a written response from the Operator detailing how the issue will be addressed or corrected, and the proposed timeframe(s) for said corrections. See *Process for Responding to Enforcement Actions* below for additional details.

B. Enforcement Letters:

1. Warning Letter-The purpose of this letter is to document and to provide notice concerning any probable violations of a rule or regulation.
2. Letter of Concern- The purpose of this letter is to document concerns with an Operator's plans, programs, or facilities, which could result in a probable violation unless action is taken to address the issue.

Enforcement Letters require a written response within thirty (30) days acknowledging receipt of the letter(s). Enforcement Letters serve as notice to the Operator that if appropriate action is not taken to correct the probable violation(s), enforcement actions may be taken if a subsequent inspection reveals continuing or new violation(s). The Operator is not required to provide corrective action or file a written plan of action; however, it is in the best interest of the Operator to provide notice as to whether any corrective action will be taken. Failure to provide this information may result in formal interrogatories from the Director through data requests.

C. Notifications:

1. Observed Issue: The purpose of this notification is to inform the Operator of identified or observed conditions or operating practices that may or may not be in violation at the time. However, if the issue is not corrected, it may result in a future violation or an unsafe situation.

Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director

2. **No Violation:** The purpose of this notification is to inform the Operator that no violations were noted during the inspection. This notification will be sent to the Operator by electronic mail. Please note that it is the Operator's responsibility to ensure that the GPSC has the correct e-mail address for the required recipient of Commission correspondence.

Notifications require an electronic response to the Director @ michellet@psc.state.ga.us within five (5) days acknowledging receipt of the notification.

II. Process for Responding to Enforcement Actions

Unless otherwise noted, the Operator has thirty (30) days from the date the Enforcement Action is received by the Operator filed to file a written response with the Executive Secretary or request an informal conference with the Director. Any Operator who chooses to request an informal conference shall request such a conference through either emailing or calling the Director at michellet@psc.state.ga.us / 404-463-2765.

A. Notice of Probable Violation (NOPV)

The Operator may request an informal conference with the Director and/or her Staff to discuss the NOPV. The violation may be resolved at this stage; however, if agreement cannot be reached, enforcement procedures shall continue. If you chose not to seek an informal conference, the following due process options are available:

1. The Operator may submit a written statement to the Director indicating that corrective measures have achieved compliance; or
2. The Operator may submit a written plan of action to the Director outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated.

If the corrective measures that the Operator presents or proposes are acceptable to the Director, the violation may be cleared at this point. Such acceptance shall be verified by written statement issued by the Director following a re-inspection of the operator's facilities.

If the proposed solution as outlined is not satisfactory to the Director, the violation shall be referred to the Commission for formal resolution in either of the following manners:

1. The Commission may seek an injunction or mandamus in superior court in cases where immediate action is necessary; or
2. The Commission may issue a show cause order and/or schedule a hearing requiring the operator to demonstrate why the operator should not be subject to the penalties set forth by O.C.G.A. §46-2-91.

B. Notice of Probable Violation with a Proposed Civil Penalty

The Operator may request an informal conference with the Director and/or her Staff to discuss the NOPV and proposed civil penalty. The violation and/or proposed civil penalty may be resolved at this stage; however, if agreement cannot be reached, enforcement procedures shall continue. If you chose not to seek an informal conference, the following due process options are available:

1. If you are not contesting the violation alleged or the proposed civil penalty, submit a written response notifying the Director of your desire to settle this matter by paying the recommended proposed civil penalty. Upon such notification, you will be provided with a Consent Agreement that shall be fully executed by the Operator, and submitted along with a

Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director

certified check for the full amount of the recommended civil penalty and made payable to the Georgia Public Service Commission. You must ensure that the Operator's name and the applicable Docket No. and Inspection Report No. are included in the "memo" line of the certified check. The certified check shall be mailed to:

Ms. Michelle Thebert, Director
Facilities Protection Unit
Georgia Public Service Commission
244 Washington Street
Atlanta, Georgia 30334

2. If you are not contesting the violation alleged, but are contesting the proposed civil penalty, and wish to submit written explanations, information, or other materials you believe warrant mitigation of the civil penalty, you may submit such materials. The Director will review the materials and provide the operator with a draft Consent Agreement that will represent the Staff's initial settlement offer. You must either sign the draft Consent Agreement or submit a counter-offer back to the Staff within thirty (30) days. Please refer to Commission Rule 515-9-3-.011, for the factors that the Commission considers regarding the assessment of civil penalties.

If an agreement cannot be reached, the alleged violation and proposed civil penalty shall be referred to the Commission for formal resolution in either of the following manners:

1. The Commission may seek an injunction or mandamus in superior court in cases where immediate action is necessary; or
 2. The Commission may issue a show cause order and/or schedule a hearing requiring the operator to demonstrate why the operator should not be subject to the penalties set forth by O.C.G.A. §46-2-91.
3. If you are contesting both the alleged violation and the proposed civil penalty, you may request a hearing before the Commission. Please see *Procedures for Requesting a Hearing* below.

C. Notice of Amendment (NOA)

The Operator may request an informal conference with the Director and/or her Staff to discuss the NOA. If you chose not to seek an informal conference, the following due process options are available:

1. If you are not contesting the NOA, you must submit to the Director the measures taken or of your plan(s) to address the observed deficiencies identified in the NOA. If the corrective measures that you present, or propose, are acceptable to the Director, the violation may be cleared this point. Such acceptance shall be verified by written statement issued by the Director following a re-inspection of the operator's facilities;
2. If you are not contesting the NOA, but you wish to submit written explanations, information, or other materials believed to warrant modification of the NOA in whole or in part, or if you are seeking clarification of the terms of the NOA, you may submit such materials; or
3. If you wish to contest the NOA, you must submit written explanations, information, or other materials in answer to the allegations in the NOA stating your reasons for objecting to the NOA, in whole or in part. If the information provided is acceptable to the Director, the issue may be closed at this point. Such acceptance shall be verified by written

Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director

statement issued by the Director. If the information provided is not acceptable to the Director, then the Operator will be given the option of an Informal Conference with the Director or the case will be referred to the Commission for a formal resolution on the contested issue.

D. Continuing and/or Existing Violations

Continuing and/or existing violations that were not cleared as a result of the current inspection must be addressed in the response letter. The Operator shall provide the current status, updates, expected completion dates, proposed modifications, etc., of the continuing and/or existing violations in each response letter, even if this information was provided in a previously filed response letter. Failure to provide this information may result in formal interrogatories from the Director through data requests. **Please Note:** Referencing a previously filed response letter does not meet the intent of this provision.

III. Procedures for Requesting a Hearing

The Operator has the right to request a hearing to contest the alleged probable violations, recommended civil penalties, and all other proposed actions of enforcement. A request for a hearing must be submitted in writing and in accordance with Commission Rule 515-2-1-.04. The Operator must include a statement of the issues that you intend to raise at the hearing. The issues may relate to the allegations, new information, proposed compliance order, proposed civil penalty, or any other recommendation for enforcement action. Please refer to Commission Rule 515-9-3-.11 and O.C.G.A. § 46-2-91 for assessment considerations upon which civil penalties are based. An operator's failure to specify an issue may result in a waiver of the right to raise that issue at hearing. Your request must also indicate whether or not you will be represented by counsel at the hearing.

You are advised that any material provided to the Commission, and all materials prepared by the Commission, including the Notice of Probable Violations and any Orders issued in this case, may be considered public information and subject to disclosure under the Georgia Open Records Act (O.C.G.A. § 50-18-70 et seq.).

If you believe that any portion of your response material is security sensitive, privileged, confidential or may cause your company competitive disadvantages and would qualify for protection under the Commission's "Trade Secret Rule" (Commission Rule 515-3-1-.11), you must, along with the complete original document clearly marked "TRADE SECRET" on each page, provide a second copy of the document with the portions you believe qualify for trade secret treatment redacted, and an explanation of why you believe the redacted information qualifies for such trade secret treatment. Should the Commission receive a request for disclosure of any "TRADE SECRET" material, you will be notified, if after review, the materials and your provided justification are deemed not to meet any exemptions provided in the Georgia Open Records Act. You may appeal the Commission's decision to release material at that time. Your appeal will stay the release of those materials until a final decision is made.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN THE MATTER OF:

Probable Violation(s) Enforcement Report
City of Lumpkin Gas Department
Inspection LBJ16-003 on January 6, 2016

)
)
) DOCKET NO. 37066
)
)
)

CERTIFICATE OF SERVICE

I hereby certify that the *Probable Violation(s) Enforcement Report, City of Lumpkin Gas Department, Inspection LB16-003 on January 6, 2016* was filed with the Commission's Executive Secretary in the above-styled Docket, and a copy of same was served upon all parties and persons listed below via electronic mail as indicated by an asterisk. I further certify that the *City of Lumpkin Gas Department* was served a hard copy of the above-stated document by U.S. Mail, certified/return receipt requested.

*Reece McAlister, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

*Randy Butts, City Manager
City of Lumpkin Gas Department
P.O. Box 278
Lumpkin, GA 31815
rcbutts@att.net

*Michelle Thebert, Facilities Protection Unit Director
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

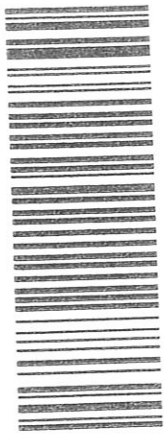
Respectfully Submitted this 14th day of April 2016:



Cathy Nesbitt, Administrative Assistant
Georgia Public Service Commission
Facilities Protection Unit
244 Washington Street, SW
Atlanta, GA 30334

Probable Violation(s) Enforcement Report,
City of Lumpkin Gas Department
Inspection LB16-003
Docket No. 37066/Document No. 162999

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
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Sent to: Randy Butts, City Manager
 City of Lumpkin Gas Department
 P.O. Box 278
 Lumpkin, GA 31815
 City, State: DN37066-162999 LB16-003

Postmark Here

PS Form 3811, August 2006 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Randy Butts, City Manager City of Lumpkin Gas Department P.O. Box 278 Lumpkin, GA 31815 DN37066-162999 LB16-003</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7011 3500 0001 5231 0140</p>