



PROCUREMENT OF ASPHALT

AUDIT REPORT #0220

May 2002



Copies of this audit report #0220 (project #0110) may be obtained from the City Auditor's web site (<http://talgov.com/citytlh/auditing/index.html>), by telephone (850 / 891-8397), by FAX (850 / 891-0912), by mail or in person (City Auditor, 300 S. Adams Street, Mail Box A-22, Tallahassee, FL 32301-1731), or by e-mail (dooleym@talgov.com).

Audit conducted by:

Jerry Edwards, CIA, Senior Auditor

Jim Hakemoller, Senior Auditor

Jim Carpenter, Audit Manager

Sam M. McCall, CPA, CIA, CGFM, City Auditor



300 S. ADAMS ST.
TALLAHASSEE, FL
32301-1731
850/891-0010
TDD 1-800/955-8771
talgov.com

SCOTT MADDOX
Mayor
DEBBIE LIGHTSEY
Mayor Pro Tem

JOHN PAUL BAILEY
Commissioner
CHARLES E. BILLINGS
Commissioner
STEVE MEISBURG
Commissioner

ANITA R. FAVORS
City Manager
GARY HERNDON
City Treasurer-Clerk

JAMES R. ENGLISH
City Attorney
SAM M. McCALL
City Auditor

MEMORANDUM

To: Members of the City Commission

From: Sam M. McCall, City Auditor

Date: May 23, 2002


Subject: Report on an Audit on Procurement of Asphalt (#0220)

We have completed an audit of the Procurement of Asphalt (#0220). We submit this report which contains audit condition statements and the action plans provided by the employees responsible for their implementation. We will follow up on the implementation of the action plans on a periodic basis.

We thank the employees of the Streets and Drainage Division of the Public Works Department for sharing their knowledge and opinions in this cooperative effort.

Please let me know if you need further information or wish a briefing on this report.

Respectfully submitted,


Sam M. McCall
City Auditor

SMM/mbd
attachment

cc: Members of the Audit Committee
Appointed Officials
Executive Team
Edgar Grant, Director, Public Works
Rachel Lazarus, Superintendent, Streets & Drainage
Paula G. Cook, Records Management Officer

An All-America City

Table of Contents

Executive Summary..... 1

Purpose5

Scope, Objectives, and Methodology.....5

Background.....6

Significant Issues and Recommendations 10

Materials received were within generally acceptable quality tolerances, vendors were responsive to the City’s needs, invoices tested accurately reflected the materials delivered, and procedures were in place to ensure weights on the invoices were accurate.11

Streets & Drainage needs to formally establish specific performance measures to monitor asphalt vendor materials and services.12

Improvements could be made in the bid evaluation process.....14

Improvements should be made in the timely re-distribution or reclassification of the cost of asphalt material and labor to other departments.15

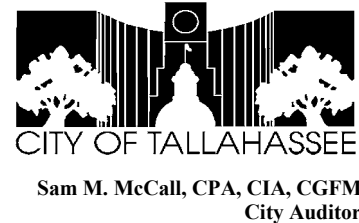
Improvements should be made in the timely payment of vendor invoices. 17

Conclusion 18

Response from Appointed Official 19

Appendix A – Management Action Plan.....20

Audit Report



“Procurement of Asphalt”

Report #0220

May 23, 2002

Executive Summary

In our audit of the procurement of asphalt for the City, we noted that improvements are needed in the: vendor performance and evaluation process; bid evaluation process; reclassification of the cost of asphalt material and labor to other departments; and payment of vendor invoices.

Annual contract for asphalt patching and resurfacing is approximately \$1.5 million a year.

The City spends approximately \$1.5 million a year on asphalt to resurface and patch City streets due to utility cuts and potholes. Since 1998 the City has issued two Requests for Bids (RFB) for asphalt, one in 1998 and one in 2000. In 1998, the City entered into an annual price agreement with Mitchell Brothers, Inc. The price agreement was extended to August 2000. In August 2000, following the second Request for Bids, an annual price agreement was entered into with Sandco, Inc. That agreement was extended through August 2002.

We found no significant issues regarding responsiveness or quality of materials.

We did not note any significant issues related to the quality of materials or the responsiveness of the vendors to the needs of the City. Streets & Drainage and the vendors have had a professional working relationship that appears to be very effective. Streets & Drainage uses a self-policing program and awards asphalt contracts to

contractors certified by the Florida Department of Transportation. Streets & Drainage also deploys on-site staff that continually sample and test the materials and reject or accept the materials based upon visual inspection. Materials received by Streets & Drainage were generally within acceptable quality tolerances.

The Department needs to complete a vendor evaluation as required by the Request for Bids.

However, we noted that Streets & Drainage has not formally established specific performance measures to monitor asphalt vendor materials and services. Streets & Drainage also needs to improve its process of documenting vendor performance to provide for increased accountability. Specifically, Streets & Drainage needs to complete a contractor evaluation form as required by the Request for Bids. This should assist in future bid evaluations and help ensure the City contracts with quality vendors.

All items in the RFB should be considered in the bid evaluation.

Based on our review, improvements should also be made in the bid evaluation process. The bid evaluation process should consider all items contained in the Request for Bids.

Streets & Drainage should improve the timeliness of charging other departments for street repairs.

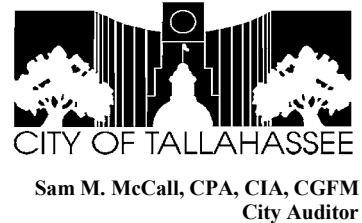
Our review showed that Streets & Drainage needs to more timely charge other departments for the cost of providing asphalt. For example, in October 2001 Gas Utility installed a gas tap, dug up the roadway, and Streets & Drainage paved the cut. However, as of April 2002, Gas Utility had not yet been charged for the asphalt and labor to repair the street.

Procedures should be implemented to ensure vendor invoices are processed in a timely manner.

Based on our review, Streets & Drainage needs to develop a procedure to expedite the review and approval of vendor invoices. This procedure should ensure that vendor invoices are paid within the specified time (45 days), as provided in the State's prompt payment law.

We would like to thank staff from Streets & Drainage and all the departmental staff that provided their support and assistance during this audit.

Audit Report



“Procurement of Asphalt”

Report #0220

May 23, 2002

Purpose

The purpose of this report is to evaluate the process of procuring asphalt for the City and the procedures used by the Streets & Drainage Division of the Public Works Department to charge other departments.

Scope, Objectives, and Methodology

The scope of this audit included a review of the City’s procurement of asphalt under a price agreement with Mitchell Brothers, Inc., and Sandco, Inc., during the period of August 20, 1998, through March 31, 2002.

The objectives of this audit were to determine whether:

- the City used a reasonable selection methodology during the Request for Bids (RFB) process;
- the contractor provided quality materials in a timely manner;
- the City made accurate and timely payments to the contractor; and
- Streets & Drainage used a reasonable allocation methodology to distribute costs to other departments.

To address the above objectives, we reviewed records and documents maintained by Streets & Drainage, Procurement Services, Accounts Payable, and the Florida Department of Transportation. We also interviewed Streets & Drainage staff, Department of Transportation staff, visited vendor plants, and City job sites. This audit was conducted in accordance with Generally Accepted Government Auditing

Standards and Standards for the Professional Practice of Internal Auditing, as applicable.

Background

The City spends approximately \$1.5 million a year on asphalt to resurface and patch city streets due to utility cuts and potholes. Since 1998 the City has issued two Requests for Bids (RFB) for asphalt and has entered into two annual price agreements for asphalt with two different vendors (Mitchell Brothers and Sandco), one in 1998 and one in 2000.

Mitchell Brothers Contract

On May 12, 1998, the City issued a Request for Bids (RFB) to select the vendor for the Annual Asphalt Paving Contract for the period August 20, 1998, through August 20, 1999. The City sent out 41 RFBs and received two bids, one from Mitchell Brothers and one from Peavy and Son Construction. The estimated amount of the contract was \$1.5 million. The RFB provided for one annual extension of the contract.

The RFB contained price requests for specific items and services. (See Table 1.)

**Table 1
Items included in RFB**

Item #	Description
1	Type S-I Asphaltic Concrete on City Trucks
2	Type S-III Asphaltic Concrete on City Trucks
3	Type II Asphaltic Concrete on City Trucks
4	Sand Asphalt Hot Mix on City Trucks
5	Type PM-2 Cold Plant mixed asphalt patching material on City Trucks
6	Furnish Asphalt paving machine with operator
7	FC-1 Asphaltic Concrete "job site"
8	FC-4 Asphaltic Concrete – rubber binder "job site"
9	Type S-I Asphaltic Concrete "job site"
10	Type S-III Asphaltic Concrete "job site"
11	Type II Asphaltic Concrete "job site"
12	Sand Asphalt hot mix S-I "job site"
13	Asphalt tack coat RS-1 "in place"
14	Asphalt tack coat AEP-1 "in place"
15	Type S-I Asphaltic Concrete "in place"
16	Type S-III Asphaltic Concrete "in place"
17	Type II Asphaltic Concrete "in place"
18	Sand Asphalt hot mix "in place"
19	Removable lane striping – solid line
20	Removable lane striping – skip dash line
21	Temporary paint lane striping for solid line
22	Temporary paint lane striping for skip dash line

Streets & Drainage used bid prices of seven items to award the contract.

The awarding of the contract was based on the bid evaluation process shown in Table 2. The evaluation was based on seven items that are used the most frequently.

**Table 2
Bid Evaluation Methodology**

Lowest average weight bid (.50 X Item 3 + .50 X Item 2)
Lowest bid for Item 6
Lowest average weight bid (.70 X Item 10 +.30 X Item 12)
Lowest average weight bid (.70 X Item 16 +.30 X Item 18)

The City Commission awarded Mitchell Brothers the contract for the period August 20, 1998, through August 20, 1999.

After the bids were received and evaluated according to the methodology stated above, the Director of the Department of Public Works recommended Mitchell Brothers. On July 8, 1998, the City Commission, at its regular scheduled meeting, approved and awarded the Annual Asphalt Paving Contract to Mitchell Brothers. On July 9, 1999, the contract was extended for the period August 21, 1999, through August 20, 2000. The City paid Mitchell Brothers \$2,350,452 for asphalt purchased during the time period of the price agreement.

Sandco Contract

On May 16, 2000, the City issued a second RFB to select a new vendor for the Annual Asphalt Paving Contract. The period of the contract was from August 21, 2000, to August 20, 2002, with an option to extend the contract for one additional year. Fifty-nine vendors were notified of the solicitation and 10 vendors were provided the bid package. Three bidders responded to the RFB: C.W. Roberts Construction; Sandco, Inc.; and Peavy & Son Construction. The City anticipated purchasing \$1.5 million of services during the contract period.

Bids were requested for the items shown in Table 3.

Table 3
Items included in the RFB

Item #	Description
1	Type S-I Asphaltic Concrete on City Trucks
2	Type S-III Asphaltic Concrete on City Trucks
3	Type II Asphaltic Concrete on City Trucks
4	Sand Asphalt Hot Mix on City Trucks
5	Type PM-2 Cold Plant mixed asphalt patching material on City Trucks
6	Furnish Asphalt paving machine with operator
7	FC-1 Asphaltic Concrete "job site"
8	FC-4 Asphaltic Concrete – rubber binder "job site"
9	Type S-I Asphaltic Concrete "job site"
10	Type S-III Asphaltic Concrete "job site"
11	Type II Asphaltic Concrete "job site"
12	Sand Asphalt hot mix S-I "job site"
13	Asphalt tack coat RS-1 "in place"
14	Asphalt tack coat AEP-1 "in place"
15	Type S-I Asphaltic Concrete "in place"
16	Type S-III Asphaltic Concrete "in place"
17	Type II Asphaltic Concrete "in place"
18	FC-1 Asphaltic Concrete "in place"
19	Sand Asphalt Hot Mix "in-place"
20	Removable lane striping – solid line
21	Removable lane striping – skip dash line
22	Temporary paint lane striping for solid line
23	Temporary paint lane striping for skip dash line

The bid evaluation was based on weights and the calculation of the prices for seven of the above 23 items. (The calculation is shown in Table 4.)

Table 4
Bid Evaluation Methodology

Lowest average weighted bid (.50 X Item 3 + .50 X Item 2)
Lowest bid for Item 6
Lowest average weighted bid (.70 X Item 10 +.30 X Item 12)
Lowest average weighted bid (.70 X Item 16 +.30 X Item 18)

The City Commission awarded Sandco, Inc., the contract for the period August 21, 2000, through August 20, 2002.

After evaluating the bids, the RFB evaluation team recommended the contract be awarded to Sandco. On July 12, 2000, the City Commission approved the award of the Annual Asphalt Paving Contract to Sandco, Inc. For the period August 21, 2000, to March 31, 2002, the City has paid Sandco \$1,031,989 for asphalt under the price agreement.

Based upon our review and testing, the City and the asphalt contractors have an effective professional working relationship. The City uses a self-policing program and awards contracts to contractors certified by the Florida Department of Transportation. The City deploys on-site staff that continually sample and test the material for such items as color or temperature and reject or accept the materials based upon visual inspection. In addition, independent lab reports are used to evaluate material quality, but the results of these lab reports are not readily available until approximately four weeks afterward. Due to the continuous on-site reviews, the contractor is given timely feedback as to the quality of material and can quickly make adjustments to the material if needed. This inspection, examination and feedback system has resulted in a professional working relationship with the vendor, and the City has had just a few complaints.

***Significant Issues
and
Recommendations***

During our audit, we identified some areas that are working well and other areas where some improvements could be made.

Materials received were within generally acceptable quality tolerances, vendors were responsive to the City's needs, invoices tested accurately reflected the materials delivered, and procedures were in place to ensure weights on the invoices were accurate.

Materials received by Streets & Drainage were within acceptable quality tolerances. We noted no significant unacceptable quality issues. The on-site inspection of materials by staff and the independent lab reports confirmed that the quality of materials was acceptable.

Through our discussions with Streets & Drainage staff, we did not note any significant complaints related to the quality of materials or the responsiveness of the vendors to the needs of the City.

We tested 6 out of 420 Sandco invoices and 11 out of 881 Mitchell Brothers invoices. Vendor invoices tested were submitted accurately and reflected materials used. All of the vendor invoices accurately reflected the amount and type of materials used.

Procedures were in place to ensure weights contained on the invoices were accurate. Examples of procedures include:

- The City uses the Florida Department of Transportation Standards Specifications For Road And Bridge Construction to determine the procedures for an electronic weight system. These standards provide that the use of an electronic weight system that has an automatic printout must be approved every six months by a certified scale technician and meet weekly

comparison checks with certified truck scales. Both Mitchell Brothers and Sandco have electronic weight systems.

- The Department of Transportation checks the accuracy of all truck scales at the commencement of production and thereafter at least once a week during production by randomly selecting a loaded truck of asphalt mix and comparing the truck number and gross weight to the contractor's delivery ticket.

These procedures provide a level of assurance that the weights contained on the invoices are correct.

We identified the following areas where some improvements could be made.

- vendor performance
- bid evaluation procedures
- use of vendor evaluation forms
- reclassification of costs to other departments; and
- timely payment of vendor invoices

Streets & Drainage needs to formally establish specific performance measures to monitor asphalt vendor materials and services.

Additional performance measures to monitor asphalt vendor materials and services should be developed.

While Streets & Drainage and the vendor have an effective professional working relationship, we believe that some specific measures should be used to periodically monitor the vendor's performance. The City's Internal Control Guidelines (Administrative Policy and Procedure #630) stress the need for assessing the quality of performance over time through ongoing monitoring activities. There are several contract provisions that would be suitable for periodic evaluation: quality of materials, contractor responsiveness, and

vendor billing accuracy. For example, performance measures that could be used include:

- vendor response time to orders placed by the City for patch work
- vendor response time after order is placed by the City for on-site delivery for resurfacing projects
- quality of the materials provided by the vendor
- accurate invoicing for materials supplied
- accurate amounts of material billed
- accurate prices of material charged
- timely payment of vendor invoices by the City

We recommend that Streets & Drainage develop measures to evaluate vendor performance and deliverables periodically.

Vendor evaluation forms should be completed periodically.

Streets & Drainage does not complete a contractor evaluation form in all cases and does not follow their “policy” relating to major violations that states, “...if severe enough, will be documented in the contract evaluation form that is completed for the Procurement Services section when the contract is ended.” For the Mitchell Brothers contract, Streets & Drainage staff was unable to provide a copy of a completed vendor evaluation form, and a vendor evaluation form was not on file in Procurement Services.

Streets & Drainage should periodically complete vendor evaluation forms noting the performance of the vendor.

The Request for Bids contains a section on vendor performance evaluation that states, “The successful vendor(s) are subject to have their performance evaluated by the City of Tallahassee, using a standard

form. This form will be on file in Procurement Services and will become a 'Public Record'."

We recommend that Streets & Drainage periodically complete a vendor evaluation form, as required by the RFB; Streets & Drainage could include some of the additional performance measures discussed earlier on the evaluation. While Streets & Drainage, through its on-site monitoring, continuously assesses the performance of the asphalt vendor, it should periodically document their performance. Contract evaluations would be a valuable tool to be used in conjunction with future bid evaluations.

Improvements could be made in the bid evaluation process.

Not all items contained in the Request for Bids were used to evaluate the awarding of the contract.

Streets & Drainage and Procurement Services only considered seven of 22 items contained in the Request for Bids (RFB) in awarding the contract to Mitchell Brothers for the period August 20, 1998, through August 20, 1999. The seven items used most frequently were assigned various weights to take into consideration the expected usage by Streets & Drainage. The remaining 15 items were not considered in determining the lowest and best vendor. Bid evaluations should consider each item in the RFB to determine the overall best and lowest price vendor.

Only seven of 23 items contained in the RFB were considered in awarding the contract to Sandco for the period August 21, 2000, through August 20, 2002.

Again, weights were assigned to the seven items used most frequently. Streets & Drainage based the weights on expected usage. The remaining 16 items were not considered in the awarding of the Annual Asphalt Paving Contract. In our opinion, all items included in the bid should be included in the bid evaluation. For those items not used extensively, the weight factor assigned would be very low.

We recommend that all items included in the Request for Bids (RFB) be considered in the awarding of the vendor contract. All items should be included in evaluating the bid. Weights could be assigned to each item depending on the expected demand for the item.

Alternatively, reduce the number of items in the RFB to those used most frequently and evaluate the bid based on these items.

Improvements should be made in the timely re-distribution or reclassification of the cost of asphalt material.

Streets & Drainage has a reasonable methodology and process to distribute the cost of asphalt materials to other departments. Each utility has an annual work order for patch repairs. Each Streets & Drainage foreman prepares daily worksheets that account for labor hours by work order, by crewmember and the amount of material used by the pound using a calculation based on the size and depth of the patch (120 pounds per square yard per inch). Labor to lay the asphalt is charged directly to work orders through the payroll time and

attendance system by using the foreman worksheets. Asphalt costs are originally charged to a Streets & Drainage work order. Periodically, Streets & Drainage reclassifies the cost of asphalt through the use of a journal entry that credits the Streets & Drainage work order and charges the appropriate departmental work order for the material used.

The timing of reclassification of the cost of asphalt materials to other departments could be improved.

The process of redistributing or reclassifying the cost of asphalt materials to other departments has not been done in a timely manner. As of April 1, 2002, (the end of the audit fieldwork) only costs through October 2001 had been reclassified.

The process of billing other departments' work orders should be done in a timely manner in order to ensure the availability of funds to pay for the work. Streets & Drainage staff stated their goal was to reclassify costs every quarter.

We recommend that the reclassification (reallocation) of the cost of asphalt be more timely. The reclassification should be performed at least quarterly and should be made at least monthly during the last quarter of the fiscal year. An alternative method of reallocating costs could be through the use of standard costs based on the size of the patch. These standard costs would include labor, overhead costs, and material costs. Quarterly or semiannually, these standard costs could be revised based on the previous period's actual costs. This method could save considerable input time in the payroll time and attendance system and speed up the process

of reclassifying costs, and reduce the need to charge overhead costs by journal voucher.

Improvements should be made in the timely payment of vendor invoices.

The City did not always pay Mitchell Brothers and Sandco asphalt invoices within the specified time (45 days), as required by prompt payment rules and procedures.

The City did not always pay Mitchell Brothers and Sandco asphalt invoices within the specified time (45 days), as required by the prompt payment law and the RFB. We found that the payment of invoices was longer than 45 days in 38 out of 145 invoices sampled (26.2%). Streets & Drainage took on average 27.5 days, from one day to as long as 100 days, to review and approve the invoices and submit them to Accounts Payable. Accounts Payable took on average seven days, from two days to as long as 30 days, to process the invoice for payment.

Untimely payment of invoices may result in late payment interest charges. Section 218.74(4), Florida Statutes states, "All payments other than payments for construction services, due from a local governmental entity and not made within 45 days shall bear interest from 30 days after the due date at a rate of 1 percent per month on the unpaid balance. Any overdue period of less than 1 month is considered as 1 month in computing interest. Unpaid interest is compounded monthly."

Not all vendor invoices were date stamped when received.

In addition, we noted one instance where invoices were not date stamped by Streets & Drainage, which is in violation of Section 218.74(1), Florida Statutes. This section provides that, "Each local governmental entity shall establish procedures whereby each payment

request or invoice received by the local governmental entity is marked as received on the date on which it is delivered to an agent or employee of the local governmental entity or of a facility or office of the local government.”

Streets & Drainage should establish procedures to ensure that vendor invoices are processed timely.

We recommend that Streets & Drainage establish procedures to ensure that all vendor invoices are processed in a timely manner that will allow the City to pay the invoice within the 45 days required by the prompt payment law. We also recommend that Streets & Drainage develop a procedure to ensure that all vendor invoices are date stamped when received.

Conclusion

We noted that improvements are needed in the vendor selection methodology during the RFB process and vendor evaluation procedures. The bid evaluation process should use weights for all items contained in the RFB. Contract monitoring procedures should include measures and standards to help ensure that vendor performance meets predefined standards, and vendor evaluations should be completed periodically and at the end of the contract.

Streets & Drainage staff and the vendors have had a professional working relationship that has resulted in an insignificant number of complaints by the City related to vendor responsiveness and quality of asphalt materials for Mitchell Brothers, Inc., and Sandco, Inc.

Adequate procedures were in place to ensure weights contained on the invoices accurately reflect the materials

received. Improvements were needed in the timely payment of vendor invoices.

Streets & Drainage used a reasonable allocation methodology to distribute costs to other departments but needed to improve the timeliness of processing the reclassification of expenses. A standard cost method to improve the timeliness and streamline the process of entering data into the payroll time and attendance system is recommended as an option.

We would like to thank staff from Streets & Drainage and all the departmental staff that provided their support and assistance during this audit.

Management's action plan to address the issues identified in this report is presented in Appendix A.

**Response from
Appointed
Official**

City Manager:

We have reviewed the Procurement of Asphalt audit report and accept the report as written. We have no significant recommended changes and plan to follow the recommendations of the action plan.

Copies of this audit report #0220 (project #0110) may be obtained from the City Auditor's web site (<http://talgov.com/citytlh/auditing/index.html>), or via request by telephone (850 / 891-8397), by FAX (850 / 891-0912), by mail or in person (City Auditor, 300 S. Adams Street, Mail Box A-22, Tallahassee, FL 32301-1731), or by e-mail (dooleym@talgov.com).

Audit conducted by:

Jerry Edwards, CIA, Senior Auditor

Jim Hakemoller, Senior Auditor

Jim Carpenter, Audit Manager

Sam M. McCall, CPA, CIA, CGFM, City Auditor

Appendix A – Management Action Plan

Step #	Action/Task	Responsible Employee	Target Date
A. Objective: <i>Improve the vendor performance and evaluation process. Implement monitoring policies and procedures to assess vendor performance and ensure vendor evaluations are performed.</i>			
1.	Modify vendor performance evaluation form to add additional standards for the periodic evaluation of vendors (for example: vendor responsiveness, quality of materials, accuracy of invoices, invoice post audit status, etc.).	C. Shoaf	1/15/03
2.	Conduct periodic and annual vendor performance evaluations.	C. Shoaf	1/15/03
B. Objective: <i>Improve the bid award process by re-examining items to be included in the bid evaluation process.</i>			
1.	Specifically identify in the RFB the items to be considered in the bid evaluation process. Note that any additional requests for prices are “informational only” and will not be considered in the awarding of the contract.	T. Lewis	1/15/03
2.	Reflect the changes mentioned in item B1 into future Requests for Bids.	T. Lewis	1/15/03
C. Objective: <i>Improve the timeliness of the reclassification of the cost of asphalt materials to other departments. Implement monitoring policies and procedures to ensure timely reclassification of asphalt costs and timely review of charges to, and credits from, Streets & Drainage.</i>			
1.	Develop policies and procedures to ensure the cost of asphalt material is reclassified on a timely basis and forwarded to Accounting Services for the completion of a journal entry.	T. Clayton	1/15/03
2.	Timely reconcile and review the reclassification of journal entries made by Accounting Services for costs to other departments and costs charged to Streets & Drainage and advise Accounting Services of discrepancies detected.	T. Clayton	1/15/03
D. Objective: <i>Improve the timeliness of processing vendor invoices for payment.</i>			
1.	Develop policies and procedures to ensure the timely review and approval of vendor invoices for payment.	T. Clayton	1/15/03

