

**CITY OF PORTLAND, MAINE
DEVELOPMENT REVIEW APPLICATION
PLANNING DEPARTMENT PROCESSING FORM
DRC Copy**

2002-0093
Application I. D. Number

04/08/2002
Application Date

Rowe Avenue
Project Name/Description

Nevers Leon B & Patricia Jts
Applicant
162 Rowe Ave, Portland, ME 04102
Applicant's Mailing Address

162 - 162 Rowe Ave, Portland, Maine
Address of Proposed Site
261 D001001
Assessor's Reference: Chart-Block-Lot

Consultant/Agent
Applicant Ph: (207) 772-8579 Agent Fax:
Applicant or Agent Daytime Telephone, Fax

Proposed Development (check all that apply): New Building Building Addition Change Of Use Residential Office Retail
 Manufacturing Warehouse/Distribution Parking Lot Other (specify)

1,008sq ft Proposed Building square Feet or # of Units 7,640 Acreage of Site Zoning

Check Review Required:

- Site Plan (major/minor) Subdivision # of lots PAD Review 14-403 Streets Review
 Flood Hazard Shoreland Historic Preservation DEP Local Certification
 Zoning Conditional Use (ZBA/PB) Zoning Variance Other

Fees Paid: Site Plan \$50.00 Subdivision Engineer Review \$250.00 Date 04/08/2002

DRC Approval Status:

Reviewer Jay Reynolds

- Approved Approved w/Conditions See Attached Denied

Approval Date 05/10/2002 Approval Expiration 05/10/2003 Extension to Additional Sheets Attached

Condition Compliance Jay Reynolds signature 05/10/2002 date

Performance Guarantee Required* Not Required

* No building permit may be issued until a performance guarantee has been submitted as indicated below

<input type="checkbox"/> Performance Guarantee Accepted	_____	_____	_____
	date	amount	expiration date
<input type="checkbox"/> Inspection Fee Paid	_____	_____	
	date	amount	
<input type="checkbox"/> Building Permit Issue	_____		
	date		
<input type="checkbox"/> Performance Guarantee Reduced	_____	_____	_____
	date	remaining balance	signature
<input type="checkbox"/> Temporary Certificate of Occupancy	_____	<input type="checkbox"/> Conditions (See Attached)	_____
	date		expiration date
<input type="checkbox"/> Final Inspection	_____	_____	
	date	signature	
<input type="checkbox"/> Certificate Of Occupancy	_____		
	date		
<input type="checkbox"/> Performance Guarantee Released	_____	_____	
	date	signature	
<input type="checkbox"/> Defect Guarantee Submitted	_____	_____	_____
	submitted date	amount	expiration date
<input type="checkbox"/> Defect Guarantee Released	_____	_____	
	date	signature	

**CITY OF PORTLAND, MAINE
DEVELOPMENT REVIEW APPLICATION
PLANNING DEPARTMENT PROCESSING FORM
ADDENDUM**

2002-0093

Application I. D. Number

04/08/2002

Application Date

Nevers Leon B & Patricia Jts

Applicant

162 Rowe Ave, Portland, ME 04102

Applicant's Mailing Address

Rowe Avenue

Project Name/Description

Consultant/Agent

Applicant Ph: (207) 772-8579 Agent Fax:

Applicant or Agent Daytime Telephone, Fax

162 - 162 Rowe Ave, Portland, Maine

Address of Proposed Site

261 D001001

Assessor's Reference: Chart-Block-Lot

Approval Conditions of DRC

- 1 All damage to sidewalk, curb, street, or public utilities shall be repaired to City of Portland standards prior to issuance of a Certificate of Occupancy.
- 2 Two (2) City of Portland approved species and size trees must be planted on your street frontage prior to issuance of a Certificate of Occupancy.
- 3 Your new street address is now #162 ROWE AVE.(?), the number must be displayed on the street frontage of your house prior to issuance of a Certificate of Occupancy.
- 4 The Development Review Coordinator (874-8632) must be notified five (5) working days prior to date required for final site inspection. Please make allowances for completion of site plan requirements determined to be incomplete or defective during the inspection. This is essential as all site plan requirements must be completed and approved by the Development Review Coordinator prior to issuance of a Certificate of Occupancy. Please schedule any property closing with these requirements in mind.
- 5 Show all utility connections: water, sanitary, sewer, storm drain, electric, telephone, cable.
- 6 A sewer permit is required for you project. Please contact Carol Merritt at 874-8300, ext . 8822. The Wastewater and Drainage section of Public Works must be notified five (5) working days prior to sewer connection to schedule an inspector for your site.
- 7 A street opening permit(s) is required for your site. Please contact Carol Merritt ay 874-8300, ext. 8822. (Only excavators licensed by the City of Portland are eligible.)
- 8 As-built record information for sewer and stormwater service connections must be submitted to Public Works Engineering Section (55 Portland Street) and approved prior to issuance of a Certificate of Occupancy.
- 9 The building contractor shall check the subdivision recording plat for pre-determined first floor elevation and establish the first floor elevation (FFE) and sill elevation (SE) to be set above the finish street/curb elevation to allow for positive drainage away from entire footprint of building.
- 01 The site contractor shall establish finish grades at the foundation, bulkhead and basement windows to be in conformance with the first floor elevation (FFE) and sill elevation (SE) set by the building contractor to provide for positive drainage away from entire footprint of building.
- 01 A drainage plan shall be submitted to and approved by Development Review Coordinator showing first floor elevation (FFE), sill elevation (SE), finish street/curb elevation, lot grading, existing and proposed contours, drainage patterns and paths, drainage swales, grades at or near abutting property lines, erosion control devices and locations and outlets for drainage from the property.
- 01 The Development Review Coordinator reserves the right to require additional lot grading or other drainage improvements as necessary due to field conditions.

**CITY OF PORTLAND, MAINE
DEVELOPMENT REVIEW APPLICATION
PLANNING DEPARTMENT PROCESSING FORM**

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4/8/02

Application Date

Rowe Avenue

Project Name/Description

Nevers Leon B & Patricia Jts

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Consultant/Agent

Applicant Ph: (207) 772-8579

Agent Fax:

Applicant or Agent Daytime Telephone, Fax

162 - 162 Rowe Ave, Portland, Maine

Address of Proposed Site

261 D001001

Assessor's Reference: Chart-Block-Lot

Proposed Development (check all that apply): New Building Building Addition Change Of Use Residential Office Retail

Manufacturing Warehouse/Distribution Parking Lot Other (specify) _____

1,008sq ft

7,640

Proposed Building square Feet or # of Units

Acreage of Site

Zoning

Check Review Required:

Site Plan
(major/minor)

Subdivision
of lots _____

PAD/Review

14-403 Streets Review

Flood Hazard

Shoreland

Historic Preservation

DEP Local Certification

Zoning Conditional
Use (ZBA/PB)

Zoning Variance

Other _____

Fees Paid: Site Plan \$50.00 Subdivision _____ Engineer Review \$250.00 Date 4/8/02

DRC Approval Status:

Reviewer _____

Approved

Approved w/Conditions
See Attached

Denied

Approval Date _____

Approval Expiration _____

Extension to _____

Additional Sheets
Attached

Condition Compliance

signature

date

Performance Guarantee

Required*

Not Required

* No building permit may be issued until a performance guarantee has been submitted as indicated below

Performance Guarantee Accepted

date

amount

expiration date

Inspection Fee Paid

date

amount

Building Permit Issue

date

Performance Guarantee Reduced

date

remaining balance

signature

Temporary Certificate of Occupancy

date

Conditions (See Attached)

expiration date

Final Inspection

date

signature

Certificate Of Occupancy

date

Performance Guarantee Released

date

signature

Defect Guarantee Submitted

submitted date

amount

expiration date

Defect Guarantee Released

date

signature

No Site Plan

75' on New Lot
50' on ex. lot

Called 4-17
talked to 4-18
met 4-22
visited 4-22

Change 1
lot lines!
frontage!

DIVERSIFIED PROPERTIES, INC.

P.O. BOX 10127

PORTLAND, ME 04104

TEL. (207) 773-4988

FAX (207) 773-6875

April 16, 2002

TO: Jay Reynolds

FROM: Jim Wolf

RE: Barclay Avenue Letter of Credit

Enclosed please find an original and a copy of the Letter of Credit that reflects the changes requested by City Hall to our original Letter of Credit submitted on March 12, 2002.

Cc Terry N. Snow, Esq.



PERFORMANCE GUARANTEE
LETTER OF CREDIT
#68288

April 15, 2002

Lee Urban
Director of Planning and Urban Development
City of Portland
389 Congress Street
Portland, Maine 04101

Re: Application of Diversified Properties, Inc. for Development at Barclay Avenue Extension, Portland

Banknorth, N.A. hereby issues its Irrevocable Letter of Credit for the account of Diversified Properties, Inc., as developer, (hereinafter referred to as "Developer"), in the name of the City of Portland, in the aggregate amount of Seventy Six Thousand Four Hundred Fifty and NO/100 Dollars (\$76,450.00). These funds represent the estimated cost of installing site improvements as depicted on the site estimate cost of improvements form, approved on August 28, 2001 and as required under Portland Code of Ordinances Chapter 14 §§499, 403, 498(a) and Chapter 25 §§46 through 65.

This Irrevocable Letter of Credit is intended to satisfy the Developer's obligation, under Portland Code of Ordinances Chapter 14 §§501, 502 and 403, to post a performance guarantee for the above referenced development.

The City, through its Director of Planning and Urban Development and in his sole discretion, may draw on this Letter of Credit by presentation of a sight draft and the original Letter of Credit and all amendments thereto, at Banknorth, N.A. offices located at One Portland Square, Portland, Maine, stating that:

1. the Developer has failed to satisfactorily complete by June 30, 2003 the work on the improvements contained within the site estimate cost of improvements form, dated August 28, 2001; or
2. the Developer has failed to deliver to the City a deed containing the metes and bounds description of any streets, easements or other improvements required to be deeded to the City; or

3. the Developer has failed to post the ten percent (10%) Defect Guarantee required by Portland Code of Ordinances Chapter 14 §§501; or
4. the Developer has failed to notify the City for inspections.

In the event of the Banknorth, N.A. dishonor of the City of Portland's sight draft, the Banknorth, N.A. shall inform the City of Portland in writing of the reason or reasons thereof within three (3) working days of the dishonor.

After all underground work has been completed and inspected to the satisfaction of the Department of Public Works and Planning, including but not limited to sanitary sewers, storm drains, catch basins, manholes, electrical conduits, and other required improvements constructed chiefly below grade, the City of Portland Director of Planning and Urban Development or its Director of Finance as provided in Chapter 14 §501 of the Portland Code of Ordinances, may authorize the Banknorth, N.A., by written certification, to reduce the available amount of the Letter of Credit by a specified amount.

It is a condition of this Letter of Credit that it is deemed to be automatically extended without amendment for period(s) of one year each from the current expiration date hereof, or any future expiration date, unless within sixty (60) days prior to any expiration, the Banknorth, N.A. notifies the City by certified mail (restricted delivery to Duane Kline, Director of Finance, City of Portland, 389 Congress Street, Portland, Maine 04101) that Banknorth, N.A. elects not to consider this Letter of Credit renewed for any such additional period.

In the event of such notice, the City, in its sole discretion, may draw hereunder by presentation of a sight draft drawn on the Bank, accompanied by the original Letter of Credit and all amendments thereto, and a statement purportedly signed by the Director of Planning and Urban Development, at Banknorth, N.A. offices located at One Portland Square, Portland, Maine stating that:

1. this drawing results from notification that the Banknorth, N.A. has elected not to renew its Letter of Credit No. 68288: or
2. the Developer has failed to satisfactorily complete by June 30, 2003 the work on the improvements contained within the site estimate cost of improvements form, dated August 28, 2001; or
3. the Developer has failed to deliver to the City a deed containing the metes and bounds description of any streets, easements or other improvements required to be deeded to the City; or

Performance Guarantee Letter of Credit #68288
Diversified Properties, Inc.
April 15, 2002
Page 3

4. the Developer has failed to post the ten percent (10%) Defect Guarantee required by Portland Code of Ordinances Chapter 14 §§501; or
5. the Developer has failed to notify the City for inspections.

This Letter of Credit will automatically expire upon the earlier of:

1. The Banknorth, N.A. receipt of written notification from the City of Portland that said work contained within the 14-403 street access approval and as required by Portland Code of Ordinances Chapter 14 §§499, 403, and 498(a) and Chapter 25 §46 through 65 has been completed in accordance with the City of Portland's specifications and the Banknorth, N.A. Letter of Credit No. 68288 may be cancelled; or
2. the expiration date of June 30, 2003 or any automatically extended date as specified herein.

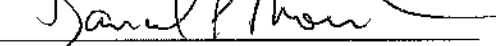
Except as otherwise expressly stated herein, this Letter of Credit is subject to the Uniform Customs and Practice for Documentary Credits (1993 Revision), International Chamber of Commerce Publication Number 500, and any subsequent revisions thereof approved by the International Chamber of Commerce (the "Uniform Customs"). This Letter of Credit shall, as to matters not governed by the Uniform Customs and as to the obligations of Banknorth, N.A. upon presentation of a site draft, be governed by and construed in accordance with the laws in effect in the State of Maine.

This Letter of Credit sets forth in full the terms of our undertaking and this undertaking shall not in any way be amended or amplified by reference to any document, instrument or agreement referred to herein (except the Uniform Customs) or in which this Letter of Credit is referred to or to which this Letter of Credit related and any such reference shall not be deemed to incorporate herein by reference any such document, instrument or agreement.

Very truly yours,

Banknorth, N.A.

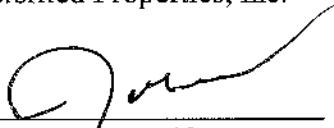
Date: 4-15-02

By: 
Daniel P. Thornton
Its Senior Vice President

Performance Guarantee Letter of Credit #68288
Diversified Properties, Inc.
April 15, 2002
Page 4

Seen and Agreed to:

Diversified Properties, Inc.

By: 
James Wolf
Its President

Reviewed pursuant to Portland Code of Ordinances, Chapter 14 §§501:

By: _____
Director of Planning and Urban Development

Date: _____

By: _____
Director of Finance

Date: _____

By: _____
Corporation Counsel

Date: _____



A division of Banknorth, N.A.

PERFORMANCE GUARANTEE
LETTER OF CREDIT
#68288

April 15, 2002

Lee Urban
Director of Planning and Urban Development
City of Portland
389 Congress Street
Portland, Maine 04101

Re: Application of Diversified Properties, Inc. for Development at Barclay
Avenue Extension, Portland

Banknorth, N.A. hereby issues its Irrevocable Letter of Credit for the account of Diversified Properties, Inc., as developer, (hereinafter referred to as "Developer"), in the name of the City of Portland, in the aggregate amount of Seventy Six Thousand Four Hundred Fifty and NO/100 Dollars (\$76,450.00). These funds represent the estimated cost of installing site improvements as depicted on the site estimate cost of improvements form, approved on August 28, 2001 and as required under Portland Code of Ordinances Chapter 14 §§499, 403, 498(a) and Chapter 25 §§46 through 65.

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1. the Developer has failed to satisfactorily complete by June 30, 2003 the work on the improvements contained within the site estimate cost of improvements form, dated August 28, 2001; or
2. the Developer has failed to deliver to the City a deed containing the metes and bounds description of any streets, easements or other improvements required to be deeded to the City; or

Performance Guarantee Letter of Credit #68288

Diversified Properties, Inc.

April 15, 2002

Page 2

3. the Developer has failed to post the ten percent (10%) Defect Guarantee required by Portland Code of Ordinances Chapter 14 §§501; or
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After all underground work has been completed and inspected to the satisfaction of the Department of Public Works and Planning, including but not limited to sanitary sewers, storm drains, catch basins, manholes, electrical conduits, and other required improvements constructed chiefly below grade, the City of Portland Director of Planning and Urban Development or its Director of Finance as provided in Chapter 14 §501 of the Portland Code of Ordinances, may authorize the Banknorth, N.A., by written certification, to reduce the available amount of the Letter of Credit by a specified amount.

It is a condition of this Letter of Credit that it is deemed to be automatically extended without amendment for period(s) of one year each from the current expiration date hereof, or any future expiration date, unless within sixty (60) days prior to any expiration, the Banknorth, N.A. notifies the City by certified mail (restricted delivery to Duane Kline, Director of Finance, City of Portland, 389 Congress Street, Portland, Maine 04101) that Banknorth, N.A. elects not to consider this Letter of Credit renewed for any such additional period.

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1. this drawing results from notification that the Banknorth, N.A. has elected not to renew its Letter of Credit No. 68288; or
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Performance Guarantee Letter of Credit #68288
Diversified Properties, Inc.
April 15, 2002
Page 3

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This Letter of Credit will automatically expire upon the earlier of:

1. The Banknorth, N.A. receipt of written notification from the City of Portland that said work contained within the 14-403 street access approval and as required by Portland Code of Ordinances Chapter 14 §§499, 403, and 498(a) and Chapter 25 §46 through 65 has been completed in accordance with the City of Portland's specifications and the Banknorth, N.A. Letter of Credit No. 68288 may be cancelled; or
2. the expiration date of June 30, 2003 or any automatically extended date as specified herein.

Except as otherwise expressly stated herein, this Letter of Credit is subject to the Uniform Customs and Practice for Documentary Credits (1993 Revision), International Chamber of Commerce Publication Number 500, and any subsequent revisions thereof approved by the International Chamber of Commerce (the "Uniform Customs"). This Letter of Credit shall, as to matters not governed by the Uniform Customs and as to the obligations of Banknorth, N.A. upon presentation of a site draft, be governed by and construed in accordance with the laws in effect in the State of Maine.

This Letter of Credit sets forth in full the terms of our undertaking and this undertaking shall not in any way be amended or amplified by reference to any document, instrument or agreement referred to herein (except the Uniform Customs) or in which this Letter of Credit is referred to or to which this Letter of Credit related and any such reference shall not be deemed to incorporate herein by reference any such document, instrument or agreement.

Very truly yours,

Banknorth, N.A.

Date: 4-15-02

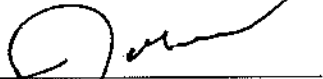
By: 

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Performance Guarantee Letter of Credit #68288
Diversified Properties, Inc.
April 15, 2002
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Seen and Agreed to:

Diversified Properties, Inc.

By: 
James Wolf
Its President

Reviewed pursuant to Portland Code of Ordinances, Chapter 14 §§501:

By: _____
Director of Planning and Urban Development

Date: _____

By: _____
Director of Finance

Date: _____

By: _____
Corporation Counsel

Date: _____



DRAFT

**PERFORMANCE GUARANTEE
LETTER OF CREDIT
#68288**

March 11, 2002

Lee Urban

Director of Planning and Urban Development
City of Portland
389 Congress Street
Portland, Maine 04101

Re: Application of Diversified Properties, Inc. for Development at Barclay Avenue
Extension, Portland

Banknorth, N.A. hereby issues its Irrevocable Letter of Credit for the account of Diversified Properties, Inc., as developer, (hereinafter referred to as "Developer"), in the name of the City of Portland, in the aggregate amount of **Seventy Six Thousand Four Hundred Fifty and No/100 Dollars (\$76,450.00)**. These funds represent the estimated cost of installing site improvements as depicted on the site estimate cost of improvements form, approved on August 28, 2001 and as required under Portland Code of Ordinances Chapter 14 §§~~499~~, **403, 498(a)** and Chapter 25 §§46 through 65. ?

This Irrevocable Letter of Credit is intended to satisfy the Developer's obligation, under Portland Code of Ordinances Chapter 14 §§501, 502 and **403**, to post a performance guarantee for the above referenced development.

The City, through its Director of Planning and Urban Development and in his sole discretion, may draw on this Letter of Credit by presentation of a sight draft and the original Letter of Credit and all amendments thereto, at Banknorth, N.A. offices located at One Portland Square, Portland, Maine, stating that:

- the Developer has failed to satisfactorily complete by June 30, 2003 the work on the improvements contained within the site estimate cost of improvements form, dated August 28, 2001; or
- 2** the Developer has failed to deliver to the City a deed containing the metes and bounds description of any streets, easements or other improvements required to be deeded to the City; or

DRAFT

- 3 the Developer has failed to post the ten percent (10%) Defect Guarantee required by Portland Code of Ordinances Chapter 14 §§501; or
- 4 the Developer has failed to notify the City for inspections.

In the event of the Banknorth, N.A. dishonor of the City of Portland's sight draft, the Banknorth, N.A. shall inform the City of Portland in writing of the reason or reasons thereof within three (3) working days of the dishonor.

After all underground work has been completed and inspected to the satisfaction of the Department of Public Works and Planning, including but not limited to sanitary sewers, storm drains, catch basins, manholes, electrical conduits, and other required improvements constructed chiefly below grade, the City of Portland Director of Planning and Urban Development or its Director of Finance as provided in Chapter 14 §501 of the Portland Code of Ordinances, may authorize the Banknorth, N.A., by written certification, to reduce the available amount of the Letter of Credit by a specified amount

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Performance Guarantee Letter of Credit #68288
Diversified Properties, Inc.
March 11, 2002
Page 3

DRAFT

4. the Developer has failed to post the ten percent (10%) Defect Guarantee required by Portland Code of Ordinances Chapter 14 §§501; or
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1. The Banknorth, N .A. receipt of written notification from the City of Portland that said work contained within the 14-403 street access approval and as required by Portland Code of Ordinances Chapter 14 §§499, 403, and 498(a) and Chapter 25 §46 through 65 has been completed in accordance with the City of Portland's specifications and the Banknorth, N .A. Letter of Credit No.68288 may be cancelled; or

2. the expiration date of June 30, 2003 or any automatically extended date as specified herein.

Very truly yours,

Banknorth, N .A.

[Signature]

Date: March 11, 2002

By:

Daniel P. Thomton

Its

Senior Vice President

Seen and Agreed to:

Diversified Properties, Inc.

BCJ- Its V...?

Performance Guarantee Letter of Credit #68288
Diversified Properties, Inc.
March 11, 2002
Page 4

DRAFT

Reviewed pursuant to Portland Code of Ordinances, Chapter 14 §§501,

By:
Director of Planning and Urban Development

Date:

By: _____
Director of Finance

Date:

By:-
Corporation Counsel

Date:

SHEET 255-B

LOCATION

TERRACE

LORENZO ST.

8	7	6	5	4	3	2	1	7	2	3	4	5	6	7	8	9	10	11	12	13	
207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228
204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225
16	15	14	13	12	11	10	72	71	70	69	68	67	66	65	64	63	62	61	60		
173	172	171	170	169	168	167	166	165	164	163	162	161	160	159	158	157	156	155	154	153	152

ROWE

SCHAMEL AVE.

5	3	2	1	1	2	3	4	5	6	7	8	9	40	10	11	12	42	13	14	15	16
2700	2700	2700	2700	2700	3000	3600	2600	2700	2700					2700	1800	2250	4050	2700	2700	2700	2700
1830	1830	1830	1830	1830	1830	1830	1830	1830	1830					1830	1830	1830	1830	1830	1830	1830	1830
9	7	6	39	38	37	36	35	34	33	32	31	41	30	29	28	43	27	26	25	24	23
2700	2700	2700	2700	2700	2400	2400	2600	2700	2700					2700	1800	1800	1800	1800	1800	1800	1800
1830	1830	1830	1830	1830	1830	1830	1830	1830	1830					1830	1830	1830	1830	1830	1830	1830	1830

HILLCREST

16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	1	2	3	4	5	6
2700	2700	2700	2700	2700	2700	2700	2700	2700	2490	2010	1920	2645	2700	2700	2700	2700	2700	2700	2700	2700	2700
1830	1830	1830	1830	1830	1830	1830	1830	1830	1830	1830	1830	1830	1830	1830	1830	1830	1830	1830	1830	1830	1830
29	28	27	26	25	24	23	22	21	20	19	18	17	16	15	14	13	12	11	10	9	8
2175	2525	2325	2115	1925	1635	1485	1355	1225	1100	965	835	705	575	445	315	185	55	54	53	52	51

MILO

1	2	3	4	5
2100	2100	2100	2100	2100
1500	1500	1500	1500	1500
17	16	15		
2100	2625	3675		

I-1
232610

(I)

PORTLAND

PWD R/W

C.M.P. Co. R/W

TO: Inspections
FROM: Jay Reynolds, Development Review Coordinator
DATE: July 22, 2002
RE: C. of O. for # 164 Rowe Ave.
Lead CBL (261D001) ID# (2002-0093)



After visiting # 164 Rowe Avenue, I have the following comments:

Site Work Completed.

At this time, I recommend issuing a Permanent Certificate of Occupancy.

Please contact me if you have any questions or comments.
Thank You.

Cc: Sarah Hopkins, Development Review Services Manager
Mike Nugent, Inspection Services Manager
file

File: O:\drc\164rowe1.doc