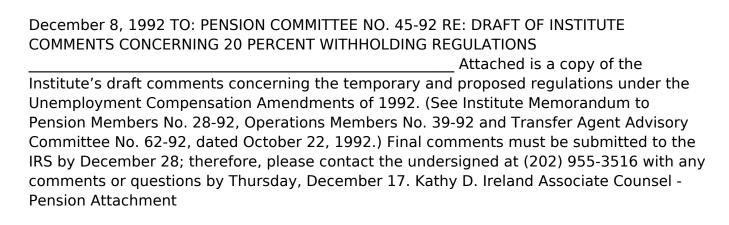


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DRAFT OF INSTITUTE COMMENTS CONCERNING 20 PERCENT WITHHOLDING REGULATIONS



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