Exhibit # IX-2.1
May 1, 2006

Key Control Guidelines

The issue of key control is an important risk management function. The risk varies greatly depending upon the size of your organization and number of vehicles. None the less, it is important for our members to develop guidelines or procedures addressing key control. Without good key control procedures a member can increase their risk such as:

- Unauthorized use of a vehicle.
- Potential for theft.
- Loss of keys.
- Accidents and damage to a vehicle.

Keys should be safeguarded in an office, preferably a locked cabinet or file. Keys should be properly marked so they can be easily identified. Duplicates should be kept in a separate secure area in case a set is lost or misplaced. A responsible party should be held responsible for handling of the keys with guidelines and procedures communicated to this individual. All drivers should also be informed of these guidelines and procedures.

A written record or log should be kept documenting vehicles that are signed out with pertinent information such as the vehicle request form, driver's name, destination of travel, time checked out, estimated time of return and any other paper work that may be needed.

Recommended Sample Key Control Policy

Keys will be picked up by the driver from the main office shortly before the vehicle's scheduled use, and the driver will sign and date the request form at this time to acknowledge receipt of the keys. The main office will retain the request form.

Drivers requesting cars for evening use will pick up keys between 4 p.m. and 4:30 p.m., on the day of use. Those needing a car on weekends will pick up the keys between 4 p.m. and 4:30 p.m. on Friday.

A driver who reserved a car for early morning departure and is unable to obtain the keys before 4:30 p.m., because the assigned car has not been returned, will pick up the car keys in the security office before departure.

Keys must be returned to the office immediately after use. If it is after office hours, the keys should be deposited in the key drop box. Vehicle inspection and /or trouble reports should also be turned in with the keys, if applicable.