

STATE OF WISCONSIN

PERSONNEL COMMISSION

* * * * *

DONNA L. SANFORD, *

Appellant, *

v. *

Secretary, DEPARTMENT OF *

TRANSPORTATION, and *

Secretary, DEPARTMENT OF *

EMPLOYMENT RELATIONS, *

Respondents. *

Case No. 94-0548-PC *

* * * * *

FINAL
DECISION
AND
ORDER

A proposed decision and order (PDO) in the above-noted case was mailed to the parties on September 22, 1995. Ms. Sanford filed written objections, to which DER did not file a reply. After consultation with the hearing examiner, the Commission decided to adopt the PDO as the Commission's final decision with the discussion supplement and amendment noted below.

First Objection Raised by Ms. Sanford

The first objection raised by Ms. Sanford relates to par. 2 in the PDO. Ms. Sanford correctly points out that par. 2 contains a recitation of excerpts from the Program Assistant (PA) Program Standard which fails to include the fourth exclusion, the text of which is shown below:

Exclusions

* * *

- 4. Positions that are more appropriately identified by another class series (such as any specialized class series where the majority of time is spent in the functions of the specialty).

The Commission first notes that the excerpts contained in par. 2 are merely excerpts from the PA Position Standard. The entire text of the standard was not intended to be recited in par. 2, nor does the language in the paragraph suggest otherwise.

The Commission further notes that similar exclusionary language is contained in the classification specification (Class Spec) for Engineering Specialist - Transportation (EST), as shown below. As a result, the pertinent question remains the same as addressed in the PDO; to wit: whether the PA Position Standard or the EST Class Spec is the best fit for Ms. Sanford's position.

Exclusions

* * *

6. All other positions which are more appropriately identified by other classification specifications.

Second Objection

Several cases are cited on page 9 of the PDO as support for the proposition that an error in classifying certain positions does not justify improper classifications for other positions because such action would merely compound the error (hereafter, referred to as the "Error Principle"). Ms. Sanford contends her situation is different from the cited cases which involved reclassification transactions, as opposed to the reallocation transaction pertinent to her case. Even if Ms. Sanford's reading of the cases were correct, the Error Principle recited has equal application to reallocation cases as to reclassification cases. A basic inquiry in each situation is to determine which Class Spec is the best fit for the duties performed by a position. Accordingly, no rational reason exists to justify the application of the Error Principle to reclassification cases and not to reallocation cases.

Third Objection

Ms. Sanford disputes the PDO's contention that the EST Class Spec requires position incumbents to make engineering decisions. Engineering decisions, however, are a requirement for classification under the EST Class Spec as noted by the EST Class Spec requirement that "positions allocated to this series must meet the current definitions of professional in s. 111.81, Wis. Stats., and the Fair Labor Standards Act" (EST Class Spec, p. 1, s. I.A.), as well as the requirement that "[t]his series encompasses positions performing professional work within the field of architecture/engineering. . ." (EST Class Spec, p. 1, s. I.B). Since the requirement is laid out in the introductory section of the EST

Class Spec, there is no need to repeat the same in the definitions section of the Class Spec.

Fourth Objection

Ms. Sanford's fourth argument is based upon 1994 Class Specs which are not within the scope of the hearing issue. The issue presented in her case requires application of the EST Class Specs in effect at the time of her 1992 reallocation. Accordingly, it is the EST Class Spec dated 6/17/90, which are relevant; not the 1994 Class Specs.

Fifth Objection

Paragraph 6 of the PDO states that contract processing tasks in the construction area "are performed by positions classified as PAs and as ESTs". Ms. Sanford contends this statement is true in 1995, but not in 1992. She then goes on to explain that such work was performed in 1990 [and presumably in 1992] by "Mr. Klemm as an ES-S, Ms. Elvord [as] an ES-J and a PA2 LTE processed the contracts, with Mr. Klemm as coordinator . . .". (Emphasis added.) Contrary to her assertion, she has not refuted the information contained in par. 6 of the PDO.

Sixth Objection

Ms. Sanford raises the historical classification confusion which previously existed with positions similar to hers, as already addressed in par. 8 of the PDO. She concludes her position is most like the position held by Roger Hanson, whose PD is marked as Exh. R-15. Her argument is unpersuasive. Exh. R-15 is Mr. Hanson's PD back in 1990 when he was classified as an Engineering Technician 4 (a classification not at issue in Ms. Sanford's case). Furthermore, Exh. R-15A is a later PD for Mr. Hanson which shows classification as a PA-3, the same classification DER granted for Ms. Sanford.

Seventh and Eight Objections

Ms. Sanford attempts in her final objections to argue that she does make engineering judgments. The examples she provides are insufficient for classification under the EST Class Specs. While she may make judgements independently, the majority of such judgements are not made using the

professional engineering skills and knowledge contemplated under the EST Class Spec.

Amendment

The following amendment is made to clarify the meaning of the information recited in par. 8 of the PDO.

Delete par. 8 of the PDO and replace it with the following language:

8. Historically, the classification of the positions noted in the prior paragraph varied. For example, Mr. Hanson's position previously had been classified as an Engineering Technician 4 (ET-4) (Exh. R-15), as had the position held by Mr. Gerstmann (Exh. R-11); all at times when similar positions were classified as PAs at the 2 or 3 level. In other words, the classification of these positions has not been consistent in the past. Mr. Gerstmann previously filed an appeal claiming entitlement to the EST classification at the Senior level, rather than his then-existing ET-4 classification. The Commission rejected his arguments because he did not perform duties requiring a sufficient level of engineering knowledge. Gerstmann v. DER, 92-0147-PC, p. 10, (2/25/93) Mr. Gerstmann's appeal did not involve consideration of the PA classification.

ORDER

That the examiner's proposed decision and order be adopted as the Commission's final decision, with the amendment and supplemental discussion

noted herein. Accordingly, DER's action is affirmed and this appeal is dismissed.

Dated November 17, 1995.

STATE PERSONNEL COMMISSION


LAURIE R. McCALLUM, Chairperson

JMR


JUDY M. ROGERS, Commissioner

Parties:

Donna Sanford
601 Louis Court
DeForest, WI 53532

Charles H. Thompson
Secretary, DOT
4802 Sheboygan Ave.
P.O. Box 7910
Madison, WI 53707-7910

Jon E. Litscher
Secretary, DER
137 E. Wilson St.
P.O. Box 7855
Madison, WI 53707-7855

NOTICE
OF RIGHT OF PARTIES TO PETITION FOR REHEARING AND JUDICIAL REVIEW
OF AN ADVERSE DECISION BY THE PERSONNEL COMMISSION

Petition for Rehearing. Any person aggrieved by a final order (except an order arising from an arbitration conducted pursuant to §230.44(4)(bm), Wis. Stats.) may, within 20 days after service of the order, file a written petition with the Commission for rehearing. Unless the Commission's order was served personally, service occurred on the date of mailing as set forth in the attached affidavit of mailing. The petition for rehearing must specify the grounds for the relief sought and supporting authorities. Copies shall be served on all parties of record. See §227.49, Wis. Stats., for procedural details regarding petitions for rehearing.

Petition for Judicial Review. Any person aggrieved by a decision is entitled to judicial review thereof. The petition for judicial review must be filed in the appropriate circuit court as provided in §227.53(1)(a)3, Wis. Stats., and a copy of the petition must be served on the Commission pursuant to §227.53(1)(a)1, Wis. Stats. The petition must identify the Wisconsin Personnel Commission as respondent. The petition for judicial review must be served and filed within 30 days after the service of the commission's decision except that if a rehearing is requested, any party desiring judicial review must serve and file a petition for review within 30 days after the service of the Commission's order finally disposing of the application for rehearing, or within 30 days after the final disposition by operation of law of any such application for rehearing. Unless the Commission's decision was served personally, service of the decision occurred on the

date of mailing as set forth in the attached affidavit of mailing. Not later than 30 days after the petition has been filed in circuit court, the petitioner must also serve a copy of the petition on all parties who appeared in the proceeding before the Commission (who are identified immediately above as "parties") or upon the party's attorney of record. See §227.53, Wis. Stats., for procedural details regarding petitions for judicial review.

It is the responsibility of the petitioning party to arrange for the preparation of the necessary legal documents because neither the commission nor its staff may assist in such preparation.

Pursuant to 1993 Wis. Act 16, effective August 12, 1993, there are certain additional procedures which apply if the Commission's decision is rendered in an appeal of a classification-related decision made by the Secretary of the Department of Employment Relations (DER) or delegated by DER to another agency. The additional procedures for such decisions are as follows:

1. If the Commission's decision was issued after a contested case hearing, the Commission has 90 days after receipt of notice that a petition for judicial review has been filed in which to issue written findings of fact and conclusions of law. (§3020, 1993 Wis. Act 16, creating §227.47(2), Wis. Stats.)

2. The record of the hearing or arbitration before the Commission is transcribed at the expense of the party petitioning for judicial review. (§3012, 1993 Wis. Act 16, amending §227.44(8), Wis. Stats.

2/3/95

* * * * *

DONNA L. SANFORD,
 Appellant,

v.

Secretary, DEPARTMENT OF
 TRANSPORTATION and Secretary,
 DEPARTMENT OF EMPLOYMENT
 RELATIONS,
 Respondents.

Case No. 94-0548-PC

* * * * *

PROPOSED
 DECISION
 AND
 ORDER

A hearing was held in the above-noted case on September 15, 1995. The parties made closing arguments at hearing in lieu of submitting briefs.

The hearing issue was agreed to by the parties as shown below:

Whether respondents' decision reallocating appellant's position to Program Assistant 3 rather than Engineering Specialist Transportation-Journey was correct as of December 13, 1992.

FINDINGS OF FACT

1. Ms. Sanford's position is located in the Department of Transportation's (DOT) Division of Highways, in District #1 (Madison area). Her official position description (PD) used for the reallocation is dated November 2, 1992, and is briefly summarized below using the PD format. (Exhs. R-4 and R-5)

<u>% Time</u>	<u>Worker Goals and Activities</u>
30%	A. Provide and perform computer operations involving input, output and retrieval for the Maintenance section for the following activities: <ol style="list-style-type: none"> 1) Maintenance budget; 2) Annual Program; 3) Long-range maintenance, special, bridge and roadside program; 4) Salt inventory; 5) Investigate areas in which data processing can be utilized to increase section efficiency; and

- 6) Assist as necessary with damage claims, salt storage and machinery records.
- 10% B. District processing of county requisitions. Duties here include:
- 1) Check county requisitions for accuracy and completeness,
 - 2) Enter all costs in two computer programs for tracking, and
 - 3) Submit requisitions to Central Office Maintenance Section.
- 15% C. Prepare documents for the annual and long-range maintenance budget and program. Duties here include:
- 1) Work with area supervisors and bridge supervisor to obtain information for the annual budget.
 - 2) Provide staff with budget forms, past costs, and review project information for completeness and accuracy.
 - 3) Coordinate processing of budget documents with Central Office Maintenance requirements.
 - 4) Compile final budget documents for Maintenance Section Chief, supervisors and the Central Office Maintenance Section.
 - 5) Assist in development of methods and procedures to streamline budget process (e.g. utilize computers).
- 5% D. Responsible for the processing of documents for contracts. Duties here include:
- 1) Set up contract files to track all documents for contracts.
 - 2) Coordinate the correspondence with the contractors.
 - 3) Proof weekly reports for accuracy.
 - 4) Distribute all documentation according to established procedures.
 - 5) Submit the various estimates to BAA (on computer).
 - 6) Final out projects as necessary.
- 20% E. Perform miscellaneous administrative duties necessary for the operation of the District Maintenance Section. Duties here include:
- 1) Participate in the development of procedures and administrative documents pertaining to the maintenance section.
 - 2) Retain inventory records of all state-furnished materials used by the Maintenance Section in the District (purchases and usage).
 - 3) Maintain chloride purchase and usage records and responsible for ordering salt.
 - 4) Maintain bituminous material records and responsible for ordering the materials.

- 5) Maintain records, ledgers, files and reports pertinent to the internal operations of the Maintenance Section.
- 6) Write computer programs to maintain the information for the internal operations of the Maintenance Section.
- 7) Assist the Utility Permit Coordinator.
- 8) Provide weather information to various departments as requested and troubleshoot system problems as needed.
- 9) Update bridge inspections as needed.
- 10) Answer questions and complaints from the public.
- 11) Be proficient in all computer programs used in the Maintenance section such as PC applications; Lotus 1-2-3, Powerbase, Datacase, Displaywrite 4 and Revelations, and mainframe applications: TSO, FOS, HMS, PMS, and CICS.

- 20% F. Coordinate the District Adopt-A-Highway Program. Duties here include:
- 1) Handle all inquiries concerning the program in ten counties.
 - 2) Promote public awareness of the program through attendance at meetings.
 - 3) Review applications for conformance to established policy.
 - 4) Prepare all correspondence for the District Program.
 - 5) Set-up all highway segments for program.
 - 6) Issue permits.
 - 7) Order all supplies for the program.
 - 8) Arrange for delivery of the supplies to groups in ten counties.
 - 9) Coordinate with county for the erection or removal of signs.
 - 10) Monitor and coordinate with county forces the pick-up of sites.
 - 11) Submit requested program reports to C.O. Maintenance as necessary.

2. The Position Standard for Program Assistant (PA) includes the following pertinent information:

Purpose of this Position Standard: This Position Standard is intended to be used for making classification decisions relative to present positions performing program activities while still being flexible enough to classify future positions which may involve different programs and/or program emphasis. This Position Standard will not specifically identify every eventuality or combination or duties and responsibilities of positions that

currently exist or those that result from changing program emphasis in the future. Rather, it is designed to serve as a basic framework for classification decision making in this occupational area.

Inclusions: This series encompasses both generalized and specialized staff assistance in a wide range and combination of activities. Positions in this classification series are characterized by their involvement in and accountability for carrying out significant and recognizable segments of program functions or organizational activities. Positions are assigned related staff functions and complete phases of whole activities where discretion and decision making can not be standardized. Positions typically function in the capacity of a coordinator for an event or activity that lends significantly to the program involved. Positions normally assist a program head, supervisor or other official who is ultimately responsible for the entire program area involved.

* * *

Class Descriptions: The following class descriptions for the various class levels within the Program Assistant series are designed to provide basic guidelines for the allocation of both present and future positions, as well as to serve as a basis for comparisons with positions in other class series.

* * *

Program Assistant 3: This is paraprofessional work of moderate difficulty providing a wide variety of program support assistance to supervisory, professional or administrative staff. Positions are delegated authority to exercise judgment and decision making along program lines that are governed by a variety of complex rules and regulations. Independence of action and impact across program lines is significant at this level. Positions at this level devote more time to administration and coordination of program activities than to the actual performance of clerical tasks. Work is performed under general supervision.

Program Assistant 3 - Work Examples:

Prepares reports, research project data, budget information, mailing lists, record keeping systems policies and procedures, training programs, schedules and generally oversees operations.

Plans, assigns and guides the activities of a unit engaged in the clerical support of the program assigned.

Develops and/or revises selected policies and procedures affecting the administration of the program.

Answers questions regarding the program or division via telephone, correspondence or face-to-face contact.

May serve as an Assistant in charge of secretarial and administrative tasks in an operation handling cash procedures, equipment orders, inventory, program preparation, pricing, etc.

Composes correspondence, maintains files of program related data, sets up schedules and performs any related

administrative support function necessary to the operation of the program.

May be in charge of public relations, preparing and sending out pamphlets, brochures, letters and various program publications.

3. The classification specification (Class Spec) for Engineering Specialist-Transportation (EST), is shown below in relevant part.

Purpose of this Class Spec: This Class Spec is the basic authority . . . for making classification decisions relative to present and future engineering specialist positions primarily located with the DOT. Positions allocated to this series perform professional work in the field of architecture/engineering. . . .

Inclusions: This series encompasses positions performing professional work in the field of architecture/engineering, located primarily within the DOT. These positions perform professional work in the field of architecture/engineering in the planning, design, construction, operation and maintenance of transportation facilities. These facilities include, but are not limited to: state highways, bridges, rest areas, and airports.
* * *

Engineering Specialist - Journey: Positions allocated to this class perform a wide variety of difficult journey level engineering specialist assignments under the limited to general supervision of a higher level engineering specialist, architect/engineer, engineering specialist supervisor, or architect/engineer supervisor.

Examples of typical duties of Engineering Specialists at the Journey level are listed below:

DISTRICT - DIVISION OF HIGHWAYS AND TRANSPORTATION SERVICES
* * *

Maintenance

Permits Coordinator: These positions coordinate the review and processing of utility, governmental, and abutting landowner permit applications relating to activities performed on state highway right of way . . .

Assistant Bridge Maintenance Specialist: This position assists the District Bridge Maintenance and Inspection Engineer . . .

Roadway Maintenance Specialist: . . . These positions inspect, monitor and write reports for all routine maintenance activities performed on the State Trunk Highway System . . .
* * *

Construction

Construction/Design Pool Specialist: ...

DBE/AA/EEO/Labor Compliance Specialist: ...

Construction/Traffic Pool Specialist:

Construction Services Specialist: This position processes all construction contract documents; gathers data, reviews, recommends and processes construction project pay estimates and change orders; keeps records on all active construction projects; monitors progressive and final billings from railroads and consultants; assists in preparing section budget; provides contract information to contractors, project engineers and supervisors in absence of section chief; is liaison to railroads and utilities.

4. Ms. Sanford's position is located in the road maintenance area. She does not claim entitlement to EST-Journey level based on any of the jobs described for the maintenance section in the Class Spec. Rather, she claims entitlement to EST-Journey level due to the similarities between her job and those of the "Construction Services Specialist". She believes her position is well described by a few word changes to the Class Spec description, as shown below:

Construction Maintenance Services Specialist: This position processes all ~~construction~~ maintenance contract documents; gathers data, reviews, recommends and processes construction project pay estimates ~~and change orders~~; keeps records on all active construction projects; monitors progressive and final billings from ~~railroads~~ districts and ~~consultants~~ counties; assists in preparing section budget; provides contract information to contractors, project engineers and supervisors in absence of section chief; is liaison to ~~railroads~~ districts and ~~utilities~~ counties.

5. Ms. Beth Cannestra works for DOT in the same district as Ms. Sanford, but Ms. Cannestra works in the construction area while Ms. Sanford works in the road maintenance area. In the construction area, contract processing tasks (similar to those performed by Ms. Sanford) are performed by positions classified as PAs and as ESTs. The difference seen by Ms. Cannestra between the classification functions is that the ESTs (project engineers) do more than enter materials used in a project into the computer to generate payment to the contractor. The ESTs also

make engineering decisions in this process which justifies their classification. For example, the ESTs must determine whether the materials are appropriate for a specific project use. Ms. Sanford does not make engineering judgements in the billing tasks she performs in the road maintenance section.

6. Ronald Klemm works for DOT in the same district as Ms. Sanford, but works in the construction section as the Construction Services Coordinator, classified as an EST-Senior. It does not appear that he is required to make engineering judgements in performance of his job duties. It appears that other positions performing duties similar to Mr. Klemm's also are classified under the EST Class Spec and they also do not make engineering judgements. (Exhs. R-27, R-29 and R-30)
7. DOT has positions similar to Ms. Sanford's position in each district, as summarized below. (Exhs. R-1, R-11, R-12, R-14, R-15A, R-16, R-17 & R-18) All of these positions are classified at the same level as Ms. Sanford (PA 3).

Tom R. Gerstmann, Dist. 2: Spends 35% of time implementing district routine and special maintenance programs, 20% managing the district salt storage program, 15% scanning weather system coordination and operations, 10% managing the salt purchase program, 15% on data processing tasks and 5% performing miscellaneous administrative duties.

Sandra A. Geurts, Dist. 3: Spends 50% of time assisting the dist. chief maintenance engineer and the area supervisors in the administration of various programs and budgets, 30% functioning as office coordinator assisting in preparing paper processing for diverse units; and 20% performing routine office tasks.

Peggy Becker, Dist. 4: Spends 60% of time assisting the district chief maintenance and traffic engineer and the area supervisors in the administration of district maintenance budgets and programs and 40% assisting the district utility and permit coordinator.

Roger C. Hanson, Dist. 5: Spends 30% of time performing office coordination tasks, 30% assisting area supervisors and bridge supervisor with the preparation of maintenance budgets, the administration of approved programs and the reporting of final costs; 10% processing invoices for counties in his district

regarding routine and special maintenance, 10% performing public relations functions, 5% processing purchase orders and service agreements for waysides and rest areas, county invoices for services to other sections, and purchases of state salvaged materials, 5% monitoring all maintenance projects for adherence to budget allotments; 5% performing tasks related to the Adopt-A-Highway program, and 5% processing damage claims to DOT property.

Joan E. Frey Pospishil, Dist. 6: Spends 85% of time acting as office coordinator for the maintenance/traffic section, and 15% coordinating damage claim billing for district.

Jane M. Nelson, Dist. 7: Spends 30% of time providing technical support to district maintenance coordinator, 20% processing county requisitions, 20% implementing and coordinating Adopt-A-Highway programs, 10% producing budget documents and other computer printouts for maintenance and traffic operations, 10% providing support services for the traffic personnel, and 10% preparing necessary documents to obtain state furnished and privately supplied materials.

William W. Wills, Dist. 8: Spends 30% of time providing technical support to district permit coordinator, 25% researching and providing technical information as needed by the district maintenance engineer, area maintenance supervisors and area maintenance assistants, 20% processing county requisitions, 15% providing or coordinating such services as needed to accomplish the maintenance office operations, 5% processing damage claims involving damage to DOT property or equipment; and 5% performing miscellaneous duties as needed.

8. Historically, the classification of the positions noted in the prior paragraph varied. For example, Mr. Hanson's position previously had been classified as an Engineering Technician 4 (Exh. R-15), as had the position held by Mr. Gerstmann (Exh. R-11); all at times when the other positions were classified as PAs at the 2 or 3 level. In fact, Mr. Gerstmann previously filed an appeal claiming his position was best described under the Class Spec for Engineering Specialist rather than under the Class Spec for engineering technician. The Commission rejected Mr. Gerstmann's arguments. Gerstmann v. DER, 92-0147-PC (2/25/93). The Class Spec for Engineering Specialist was different in Mr. Gerstmann's case than the Class Spec for EST, which is pertinent to Ms. Sanford's case. Further, consideration of the PA series was deemed in Mr. Gerstmann's case as being beyond the scope of hearing.

For the reasons cited in this paragraph, the Commission's decision in Gerstmann has limited value as guidance in Ms. Sanford's case.

DISCUSSION

The EST Class Spec requires the position to perform "professional work in the field of architecture/engineering", as is clear in the Purpose and Inclusions statements quoted in paragraph 3 of this decision. The duties of Ms. Sanford's position do not require her to perform professional engineering work.

The EST Class Spec recognizes work similar to the duties performed by Ms. Sanford, but only if performed in the construction area rather than in the maintenance area. This distinction may make sense if the counterpart construction positions exercise professional engineering judgements in connection with the duties they perform which are similar to the duties performed by Ms. Sanford. (See the example provided by Ms. Cannestra as described in par. 5 of this decision.) However, this does not appear to be true based upon testimony from Mr. Klemm and based upon the PDs of similar positions, as noted in par. 6 of this decision.

The Commission, however, lacks authority to rewrite the EST Class Spec to include positions such as Ms. Sanford's which may perform tasks similar to Mr. Klemm's position but without the exercise of professional engineering work. See Zhe et al. v. DHSS & DP, 80-285, 286, 292, 296-PC (11/18/81); aff'd by Dane County Circuit Court, Zhe et al. v. Pers. Comm., 81-CV-6492 (11/82). This lack of authority exists even where it appears that DER made certain assumptions about counterpart positions (such as Mr. Klemm's) which were unverified at hearing. In other words, an err in classifying certain positions does not justify improper classifications for other positions because such action would merely compound the err. See, McCord v. DER, 85-0147-PC (3/13/86); Danielski et al. v. DER, 85-0196-PC (9/17/86); Augustine & Brown v. DATCP & DER, 84-0036, 0037-PC (9/12/84) and Lulling & Arneson v. DER, 88-0136, 0137-PC 99/13/89).

The Commission concludes that the best fit for Ms. Sanford's position is at the Program Assistant 3 level. She has not shown entitlement to classification under the EST Class Spec because she does not perform professional engineering work.

ORDER

Respondents' decision is affirmed and this appeal is dismissed.

Dated _____, 1995.

STATE PERSONNEL COMMISSION

LAURIE R. McCALLUM, Chairperson

JMR

DONALD R. MURPHY, Commissioner

JUDY M. ROGERS, Commissioner

Parties:

Donna Sanford
601 Louis Court
DeForest, WI 53532

Charles H. Thompson
Secretary, DOT
4802 Sheboygan Ave.
P.O. Box 7910
Madison, WI 53707-7910

Jon E. Litscher
Secretary, DER
137 E. Wilson St.
P.O. Box 7855
Madison, WI 53707-7855