broad definition of the word most of us could qualify as teachers. However, the rule above referred to deals with a superintendent's license in the public school system, grades 1 to 12 inclusive, and requires five years successful experience as an administrator, superintendent, principal or teacher. Each of such occupations having a well recognized status as positions in the public school system. Each tend to give a person, having fulfilled such a position in public school systems, with a special knowledge of administrator's problems of the public school systems which would confront a superintendent in the public school system.

It is well established that the same rule of construction applicable to statutes apply to rules and regulations of the administrative boards.

42 Am. Jur., Public Administrative Law, Section 101, p. 431;

For the foregoing reasons, I am of the opinion, experience as a teacher on a college level cannot be counted in order to qualify for five years teaching experience required by the foregoing rule as a qualification for a Superintendent's Certificate. The rule clearly requires five years teaching experience in the public school system as that is the requirement clearly intended when the board adopted said rule. This construction is entirely in harmony with the definition of the word "teacher" and "teaching experience" construed in connection with the Minimum Salary Act of Teachers and found in 1941 Ind. O. A. G. p. 179-180.

May 6, 1949.

Mr. R. W. Elrod,
Indiana State Veterinarian,
Room 209, State House,
Indianapolis, Indiana,

Dear Sir:

Your letter of April 12, 1949 has been received and reads as follows:

"We would appreciate it very much if your depart-
ment would give us an official opinion relative as to who has authority to grant the change of policy in establishing branch laboratories and charging for services etc., at such laboratories.

"This is relative to section 5 of House Bill No. 332 approved February 28th, 1945."

Chapter 68 of the Acts of 1945, same being section 16-436 et seq. Burns 1947 Supplement. Section 5 of said Act, being Section 16-436 Burns 1947 Supplement reads as follows:

"Requests for any subsequent needed increases in funds for the expansion or other alteration of the facilities of such laboratory, including all changes in policies such as making a charge for any services furnished by such laboratory and/or the establishment of branch laboratories, shall originate in the Indiana state live stock sanitary board, subject to the written approval of the board of trustees of Purdue University."

Under other sections of said Act on animal disease diagnostic laboratory, establishment which is to be under the administration, management, and control of the Board of Trustees of Purdue University, and the head of the department of Veterinary science of Purdue University is named as the director of said laboratory. The director is authorized to make all appointments, subject to the approval of the board of trustees of Purdue University, of the personnel that is required to efficiently operate said laboratory. (Section 1 and 2 of said act.)

Under other sections of the act the expense of operating and maintaining such laboratory shall be paid out of funds appropriated, or hereafter to be appropriated, for the administration of the Indiana state live stock sanitary board.

It has been held that a statute clear and unambiguous on its face need not and can not be interpreted by court, and only these statutes which are ambiguous and of doubtful meaning are subject to the process of statutory interpretation.

Section 4502 Southerland Statutory Construction, 3rd edition;
Hood v. State, (1906), 167 Indiana 622-624;
When the above authorities are applied to Section 5 of Chapter 68 of the Acts of 1945, supra, it is at once apparent that said section being clear and free from any ambiguity, the same is not subject to construction. Any changes in policies for the establishment, making of changes for establishment, or for making of change for services furnished in, Branch Laboratories, and any expansion or alteration of the facilities of said Branch Laboratory, shall originate in the Indiana state live stock sanitary board, subject to the written approval of the board of trustees of Purdue University.

OFFICIAL OPINION NO. 28

May 3, 1949.

Hon. Frank J. Viehmann,
Commissioner of Insurance, State of Indiana,
State House,
Indianapolis, Indiana.

Dear Mr. Viehmann:

I have your recent request for an official opinion of the following, to-wit:

"What is the proper application of the taxing statute with reference to reciprocal insurance companies of the State of Missouri operating in the State of Indiana."

The taxing statute involved is, no doubt, Section 12, Chapter 102, Acts 1919, Section 39-2812, Burns 1933 Indiana Statute 1940 Replacement.

"By reciprocal or inter-insurance is meant that system of insurance whereby several individuals, partnerships, or corporations underwrite each other's risks against loss through an attorney in fact, common to all, under an agreement that each underwriter acts separately and severally and not jointly with each other.


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