## BY THE U.S. GENERAL ACCOUNTING OFFEIGASED

Report To The Chairman, Subcommittee On Government Information, Justice, And Agriculture, Committee On Government Operations House Of Representatives

# Freedom Of Information Act Operations At Six Department Of Justice Units

The Freedom of Information Act states that agencies have 10 days to respond to a request for information. In general, the six Department of Justice units GAO reviewed took longer than 10 days. Decentralized records, the volume of requested material, the need to carefully review sensitive records, and the resulting backlogs were the primary causes of delayed responses. Without completely automating or centralizing records or making responses a top Department priority, however, significant improvements in the timeliness of responses do not seem feasible.

The report also discusses other FOIA issues of concern to the subcommittee.





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## UNITED STATES GENERAL ACCOUNTING OFFICE WASHINGTON, D.C. 20548

#### GENERAL GOVERNMENT DIVISION

B-211683

The Honorable Glenn English
Chairman, Subcommittee on
Government Information,
Justice, and Agriculture
Committee on Government Operations
House of Representatives

Dear Mr. Chairman:

This report responds to your June 23, 1982, request that we review certain aspects of the Freedom of Information Act (FOIA) operations at six selected Department of Justice (DOJ) head-quarters units, including the Federal Bureau of Investigation (FBI). In general, we found that responses to FOIA requests by these units took longer than the 10-day response time required by the act. The primary reasons for the delays were decentralization of records, the volume of requested material, the need to carefully review sensitive records, and the resulting backlogs to which these factors contribute. Without completely automating or centralizing records or making responses to FOIA requests a top priority, significant improvements in the timeliness of responses to FOIA requests do not seem feasible.

You requested that we review six specific areas regarding FOIA requests: (1) priorities assigned to processing requests, (2) deadlines for responding, (3) records management practices, (4) decisions to waive fees, (5) DOJ's response to a 1980 internal evaluation, and (6) the effects of recent changes in operations, resources, and policy regarding FOIA activities. In summary, we found that:

- --The six units reviewed determined FOIA processing priorities informally. They generally gave priority to shorter, simpler requests and to those which were considered worthy of special treatment because of a perceived public interest or a court order. We could not assess the effect of these procedures because the units did not keep specific records on which cases received priority handling.
- --According to unit officials, no processing deadlines other than the 10 working days prescribed in the FOIA had been set. Statistics on actual processing times were

kept only by the FBI. We determined processing times for a limited sample of closed FOIA requests at five units; at the sixth unit we calculated elapsed processing times for all FOIA and Privacy Act requests closed during calendar year 1982. Most of these requests took longer than 10 days to complete. Most of the requests processed quickly were those for which no records were available.

- --Primary factors contributing to delays in processing FOIA requests in the units reviewed were decentralized records, the volume of requested material, and the sensitivity of law enforcement information. These factors, in turn, contributed to various processing backlogs. We found no significant delays caused by poor records management practices within the six FOIA units.
- --We could not assess the effects of practices and procedures for waiving fees at the units reviewed because they did not keep separate records on requests involving fee waivers. Unit officials told us that decisions regarding waivers were infrequent, because few requests involved enough document pages to incur a fee. Although it varied by unit, most units would not charge a fee unless the costs to search for and duplicate the requested material exceeded about \$25. However, the units sometimes used the authority to charge fees in an effort to influence FOIA operations in various ways, such as to encourage requesters to reduce the extent of information requested. On January 7, 1983, DOJ issued new policy guidance on fee waivers. The new policy was implemented after we had completed our work at the DOJ units. We could not anticipate its effect on the number of waivers granted because we did not know how the new criteria would be applied.
- --DOJ did not formally respond to the Justice Management Division's 1980 internal evaluation of FOIA activities, nor was a response requested. The Justice Management Division recommended, among other things, that DOJ revise its FOIA regulations. At the time of our fieldwork, the regulations were being revised, but not, according to DOJ officials, as a result of the internal evaluation.
- --Resources and policy involving FOIA activities have not changed significantly in recent years. Some of the units reviewed, however, had made operational changes that improved or were likely to improve the processing of requests. These included changes in data processing equipment, administration, and organization.

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Additional details are provided in the following sections of this report.

#### OBJECTIVES, SCOPE, AND METHODOLOGY

As suggested by your office, our review was limited to six DOJ administrative and operational units, including the FBI. We reviewed:

- --how priorities for processing FOIA requests are determined;
- -- to what extent DOJ is meeting its own deadlines;
- -- the relationship of DOJ's records management practices to difficulties in responding to FOIA requests;
- --decisions to waive fees to determine whether they complied with the FOIA and DOJ policies;
- --DOJ's response to a 1980 internal evaluation of FOIA operations; and
- --how recent changes in operations, resources, and policy are affecting the processing of FOIA requests.

We met with officials responsible for FOIA activities in DOJ's Office of Information and Privacy; its Criminal, Civil, Antitrust, and Civil Rights Divisions; and the FBI. These six units accounted for about 36 percent of all FOIA requests received by DOJ during calendar year 1981. We also met with officials of the Justice Management Division, which performed the 1980 internal evaluation.

We reviewed operations pertaining to both the FOIA and the Privacy Act because the DOJ units reviewed used the same resources to respond to requests under either act. We also reviewed DOJ regulations, DOJ unit policies and procedures, and annual FOIA reports to the Congress.

To determine the procedures used and the time necessary to process requests, we reviewed 23 FOIA request files at five units. As requested by your office, at the sixth unit—the Office of Information and Privacy—we calculated elapsed processing times for all FOIA and Privacy Act requests closed during calendar year 1982, a total of 496 requests. We also attempted to gather data on how often the six DOJ units consider and grant

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(1) waivers of fees and (2) expedited processing of a request. However, the DOJ units did not maintain separate records on cases involving these conditions. Also as requested, we did not obtain agency comments. Our review was made in accordance with generally accepted Government auditing standards.

### DOJ MANAGEMENT OF FOIA AND PRIVACY ACT REQUESTS

The FOIA and the Privacy Act, as amended, enacted in 1966 and 1974, respectively, to take effect the following years, govern public access to Government information. Both acts contain general guidance on what information can be released under their disclosure and exemption provisions. Further guidance for the units we reviewed is prescribed in DOJ regulations (28 CFR 16). At the time of our fieldwork, the regulations were being revised.

Both the FOIA and the DOJ regulations in force during our review required agencies to respond to requests for information within 10 working days after receiving the request. The response is to inform the requester whether the agency has determined that it will comply with the request. DOJ officials told us that such a response could be made only after completely processing the request. For the units we reviewed, complete processing included: (1) receiving and logging in the request, (2) locating (by searching the files) and analyzing the requested material to determine what could be released and what was exempt from disclosure, such as classified material, and (3) duplicating the material to be released and mailing the response.

Generally, each DOJ unit maintained a single office to process requests made under both the FOIA and the Privacy Act. DOJ had a total of 28 different units which processed FOIA and Privacy Act requests for 30 administrative and operational divisions. DOJ regulations required that the Justice Management Division's Administrative Counsel receive incoming requests and assign them to the appropriate DOJ units. However, many requests were sent directly to the FOIA offices in the units we reviewed. Those requests sent directly to the units often had to be rerouted to the correct unit because they were incorrectly addressed. Furthermore, DOJ officials told us that an increasing level of sophistication in the nature of requests has required a greater amount of time and effort to respond to them.

#### PRIORITIES ARE DETERMINED INFORMALLY

The units reviewed have a general policy of processing requests on a first-come-first-served basis and have no formal system for setting priorities among requests. However, all the units informally gave priority to certain requests, such as shorter, simpler ones or those considered worthy of special treatment because of a perceived public interest or a court order. We could not assess the effect of these procedures on processing time because the units kept no specific records for cases which received priority handling.

Each unit usually used an informal "two-track" system which allowed shorter, simpler requests to be processed ahead of larger or more complex ones. In four of the six units, those requests which could be processed relatively quickly were identified and segregated shortly after receipt. These requests were processed right away without being placed in any backlog. The remaining, more difficult requests may have received some initial processing, but were then placed behind other requests received earlier.

The other two units, the FBI and the Civil Division, processed all requests in the same manner initially. However, when actual document analysis began, analysts sometimes processed shorter requests ahead of, or concurrently with, larger requests. Consequently, requests which required less search and analysis might be finished ahead of more difficult ones which were received first. FBI and Civil Division officials told us that this "two-track" system allows more cases to be handled in a given period.

In cases of exceptional urgency, units may expedite handling of a request, however long, if such handling would serve the public interest or if ordered by a court. Policies on when to use expedited processing varied somewhat, were informal, and were applied with subjective judgment by unit officials. Because none of the units kept records or statistics on requests which received expedited processing, and because such cases were infrequent, officials in the six units were unable to produce any examples of requests involving expedited processing during calendar year 1982. However, the difference between the FBI's and the Office of Information and Privacy's policies on handling such requests illustrates how these policies differed.

FBI officials told us they generally interpret serving the public interest to mean using expedited processing in cases of

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danger to life or property, when information exists which could prevent a miscarriage of justice, or when extreme public unrest may be quieted by timely release of facts which would dispel rumors or misinformation. Officials emphasized that such instances were rare. On the other hand, Office of Information and Privacy officials told us that they would expedite handling of a request if it involved current matters of discussion or controversy in the news media. Requests from the media on current subjects usually received expedited handling.

## THE UNITS REVIEWED COULD NOT MEET THE 10 DAY PROCESSING TIME REQUIREMENT IN THE LAW

Unit officials told us that the 10 day FOIA requirement was their only processing deadline. Most of the requests we reviewed took longer than 10 days to process. Most of the requests that were processed quickly were those for which no records were available. The FBI was the only unit that kept statistics on actual processing times. Officials from some of the other units estimated their processing times, but the only way to determine actual times was to review the documents in each request file. We reviewed a few request files in five units and, as you requested, reviewed each request closed during calendar year 1982 by the Office of Information and Privacy.

FBI statistics showed that it took an average of 139 calendar days to process requests which were closed between October 1 and December 31, 1982. If requests for which no records were found are eliminated, the average time was 191 days. from two other units provided us estimates of their times to process larger or complex requests (sometimes described as projects). The estimates ranged from about 4 months to 15 months. Less complex requests took as little as 2 days to process. Officials from two other units told us that they could not estimate their average processing times. An official from the sixth unit said his study of requests processed during the first 11 months of calendar year 1982 showed that about half of them were processed within 10 working days. In the five units other than the Office of Information and Policy, response times ranged from 2 days to 1,640 days for the 23 cases closed during calendar year 1982 that we reviewed.

From data in the case files, we calculated the time required to process each FOIA and Privacy Act request closed during calendar year 1982 by the Office of Information and Privacy.

The processing took an average of 122 calendar days. If requests for which no records were found are eliminated, the average rises to 270 calendar days. The following table shows a breakdown of the processing times for all requests closed in 1982.

Elapsed calendar days	FOIA NO records	Requests Records available	Privacy Ac No records	Requests Records available
1-10	1	5	24	0
11-30	17	8	156	5
31-180	29	46	97	18
181-360	4	13	2	6
over 360	<u>11</u>	_38	1	<u>15</u>
Total	62	110	280	44

As the table shows, requests processed quickly usually involved no records. Unit officials told us that other requests processed within 10 days generally involved little search and analysis, information previously requested which only needed duplicating, or a request which was referred to another office.

## THE PRIMARY FACTORS CAUSING PROCESSING DELAYS APPEAR, FOR THE MOST PART, TO BE OUTSIDE THE FOIA UNITS' CONTROL

Primary factors contributing to delays in processing FOIA requests in the six units involved decentralized records, the volume of requested material, and the sensitivity of law enforcement information. These factors, in turn, contributed to various processing backlogs. Significant improvements cannot be expected without completely automating or centralizing DOJ records or making responses to FOIA requests a top priority in DOJ. Our review disclosed no noteworthy delays caused by poor records management practices within the six FOIA units.

#### Decentralized records

DOJ's organizational structure consists of more than 30 offices, bureaus, and divisions identified as separate, distinct units. For the most part, each unit maintained its own records.

Furthermore, in the six units we reviewed, additional decentralized operations and recordkeeping activities occurred. The many independent operations and recordkeeping activities caused delays in processing requests because records were located in many different places, records were searched by non-FOIA staff, and comprehensive central indexes for remote records were lacking.

Within four units, records were maintained at numerous locations. In the Criminal Division, for example, 26 field offices were spread across the country, along with 18 additional multi-agency organized crime strike forces which included Division staff and records. Officials told us that approximately 2,000 search forms were mailed monthly to the field offices requesting records needed to respond to FOIA and Privacy Act requests. Headquarters FOIA staff must wait for such offices to reply before fully responding to these requests. Likewise, the FBI kept investigative records at 59 field offices. Depending upon the types of field office records requested, some requests were processed by the field office itself while others were sent to headquarters for processing. Some were processed partially in the field and partially in headquarters.

DOJ staff responsible for processing FOIA requests were located mostly in headquarters. Thus, non-FOIA staff often searched for the records in the field offices. Headquarters FOIA personnel had no control over these staff, who also had other competing duties. This situation was not limited to the field. In two units reviewed, records searches at headquarters depended at least partly on staff who were not part of the FOIA offices.

Initial records searches in FBI headquarters, for example, were conducted by the Records Services Section, which is not part of the FOIA office. FOIA unit officials told us that Records Services required an average of 6 to 8 weeks to conduct an initial search and file review in cases for which records existed. At DOJ's Office of Information and Privacy, the FOIA office must often depend on staff in many parts of DOJ since most information requested originates in other units. Furthermore, if records needed to respond to a request were not recent, they were sometimes stored at the Federal Records Center in Suitland, Maryland. In these cases, the DOJ units must depend on Center personnel to find and send the requested records.

Delays associated with location of records might be less severe if FOIA staff knew what records existed in the various field locations. Only one of the units reviewed--the Antitrust Division—had a complete index of both headquarters and field records. By contrast, the Criminal Division and the FBI, the two units reviewed with the largest number of field locations, did not have indexes at headquarters which listed all field office records. However, because of the extent of records in many offices and the lack of computerized records, a centralized index did not seem feasible. The FBI, however, plans to automate its records to provide more complete indexing at headquarters.

#### Volume and sensitivity of records

The need to examine voluminous and/or sensitive law enforcement information accounted for some delays in processing requests. The nature of certain investigatory records necessitated a careful line-by-line review of requested material. Furthermore, some large requests—often termed "projects"—required a time-consuming review of many thousands of pages of documents that often took several months to complete.

Officials at the FBI and the Criminal Division told us they frequently receive FOIA or Privacy Act requests for sensitive law enforcement information. Commingled with the requested documents may be information on informants, special investigative techniques, and other material considered confidential and thus exempt from disclosure. They said that particular care must be exercised in analyzing such material to avoid disclosing information which could endanger someone's life or legitimate government interests. Such careful analysis can be time-consuming.

A major portion of the workload in these same two units consisted of requests which were especially broad in scope. The amount of time required to review thousands of pages of documents was considerable. At the FBI, for instance, "project" requests—those totalling more than 3,000 pages—accounted for only 170, or about 8 percent, of the 2,169 requests being analyzed as of December 31, 1982. However, the 170 requests accounted for about 66 percent of the total analysis workload, or about 1.7 million of the 2.5 million pages to be reviewed.

Officials at three of the four other units reviewed told us their records generally were not especially sensitive, and officials at all four said they did not receive large project requests very often. One reason given was that the types of investigations handled by these units usually did not involve sensitive law enforcement information. Officials in these units

also told us that the time required for document analysis was generally only a small portion of total processing time.

#### Various backlogs

The decentralization, volume, or sensitivity of records slowed the handling of requests in some units. Consequently, backlogs developed at various places in the process, such as search and analysis of records or review of classified information.

Five of the six units reviewed had a backlog of records ready to be analyzed. For example, the Civil Rights Division's backlog as of September 30, 1982, was 360 requests. As of February 3, 1983, the Office of Information and Privacy's backlog was 64 requests. Unit officials could not determine the amount of time needed to clear these backlogs, but Office of Information and Privacy officials estimated that their backlog caused an average delay of about 9 months. The Civil Division had eliminated its backlog by September 1982.

In some instances, incoming requests backed up because units were unable to determine quickly the extent of existing records. At the FBI, for example, an official told us that although it often took only 2 days to determine if records requested did not exist, it generally took 6 to 8 weeks to determine the precise extent of records which did exist. In addition, the Criminal Division's dependence on field staff who have other competing demands resulted in a backlog of requests awaiting field responses.

Delays also occurred when requested documents contained classified or potentially classifiable national security information. Such material must go through an additional step to determine what, if any, security classification applies. At the FBI, 271 requests were at various stages of processing in the Document Classification Unit as of December 31, 1982. It took the Classification Unit an average of 40 days to handle each request returned to the FOIA section during the preceding 3 months. As of February 3, 1983, staff at the Office of Information and Privacy estimated it had an additional 3-month delay for processing requests for material which needed a classification review.

#### Additional causes of delays

Waiting for requesters to take certain actions, locating key personnel to help in sensitivity decisions, and consulting with other agencies or units within the Department also caused delays. Units reviewed sometimes had to delay processing requests while waiting for requesters to provide notarized signatures, promises to pay, payment of fees, or more specific information needed before searching for requested material. In some cases, negotiations between the unit and the requester to reduce the number of requested documents to a more manageable size caused delays.

In two units, FOIA staff told us they sometimes needed to consult with the attorneys who originally worked on the subject matter of the requests in order to better determine sensitivity. In some cases they said time was spent locating such attorneys, as some no longer worked for the unit or the Department.

Delays also occurred when units had to wait for another agency or unit to review material which originated in that agency or unit. The amount of time varied considerably, but officials told us that it generally took the CIA, for example, about 2 years to respond to such consultations because of its large backlog of other FOIA requests.

#### PROCEDURES FOR WAIVING FEES VARIED

According to officials of the six units reviewed, the minimum costs incurred by the unit before charging a fee and the criteria used to make decisions to waive fees varied from unit to unit. We could not assess the effects of these variations because the units did not keep separate records on those requests involving waiver decisions. Unit officials told us that these decisions are required infrequently because most requests do not involve enough pages to incur a fee. However, the units have used the authority to charge fees in an effort to influence FOIA operations in various ways, such as to encourage requesters to reduce the extent of information requested. On January 7, 1983, DOJ issued new policy guidance on fee waivers. We did not evaluate the new policy's effect because it was implemented after we completed our fieldwork.

The FOIA states that:

"Documents shall be furnished without charge or at a reduced charge where the agency determines that waiver or reduction of the fee is in the public interest because furnishing the information can be considered as primarily benefiting the general public."

DOJ regulations allow fees to be waived under certain circumstances at the discretion of the reviewing official. The regulations also state that fees will not be charged where they would amount to less than \$3.

Three of the six units reviewed would not charge fees unless costs to search for and duplicate the requested material exceeded \$25. Several unit officials told us this amount more closely reflected their costs to collect the fee. This fee "cutoff" point varied in the other three units. One used the \$3 specified in the DOJ guidelines, another used \$10, and the third used \$20. However, even in the unit following the \$3 cutoff, officials said decisions to waive fees were infrequent.

When decisions were required, the units used different criteria to determine whether a fee waiver should be granted. For example, one unit always granted waivers to the media or to authors if they so requested. Another unit reduced fees to the press by 50 percent whether they requested it or not.

Occasionally, the units have used fees as a basis to negotiate a reduction in the amount of information requested. For example, the Antitrust Division agreed with one requester to provide 200 pages of documents representing a sampling of available material for a copying fee of \$20. The Criminal Division, which normally used a \$25 cutoff, sometimes agreed with requesters that if the scope of the request was reduced, fees would not be charged.

On January 7, 1983, DOJ issued new policy guidance recommending that agencies more "consistently and successfully" apply the statutory fee waiver standard quoted above. We did not evaluate the new policy. We could not anticipate its effect on the number of waivers granted because we did not know how the new criteria would be applied. An FBI official told us it would not change the way the FBI makes fee waiver decisions. The guidance described five general factors agencies should consider when determining whether there is sufficient public benefit to warrant a fee waiver. These are:

--whether there is genuine public interest as distinct from that of the requester alone;

- --whether the records contribute to public understanding of a subject;
- --whether the requested information is already available in the public domain;
- --whether the requester will disseminate the information to the public; and
- --whether public benefit outweighs the requester's benefit.

## NO FORMAL RESPONSE TO THE INTERNAL FOIA EVALUATION

In October 1980, the Justice Management Division issued an internal FOIA evaluation report. The Division's evaluation staff prepared the report at the request of its new Administrative Counsel, who expected the study to provide information on his own responsibilities. However, the evaluation staff expanded the study to include all of DOJ's FOIA activities, and the report's recommendations included several that applied Department-wide. The Administrative Counsel told us DOJ did not formally respond to the evaluation. However, he said the effort to revise the Department's FOIA and Privacy Act regulations, which was ongoing at the time of our fieldwork, could be a major step toward implementing the recommendations. According to other DOJ officials, the need to revise the regulations was recognized independent of the evaluation study's recommendation and did not result from the FOIA evaluation.

In the spring of 1980, the Justice Management Division's recently appointed Administrative Counsel--whose office functions as a mail room for many FOIA requests--asked the Division's evaluation staff to conduct a study of the Counsel's FOIA and Privacy Act responsibilities and staffing requirements and to recommend appropriate changes. The evaluation staff replied in a report dated October 1980. The report recommended that DOJ:

- --update its FOIA and Privacy Act regulations;
- --prepare additional FOIA and Privacy Act guidance, including a standard operations manual and a public guide;
- --centralize nine reading rooms into one central reading room and centralize the files which record DOJ action taken on FOIA and Privacy Act requests;

- --designate specific DOJ components to directly receive FOIA and Privacy Act requests; and
- --increase the Administrative Counsel's staff resources.

Evaluation staff officials told us they perform two types of studies—management assistance reviews and formal program evaluations. They said management assistance reviews generally require no formal response from the requesting official or followup by the evaluation staff, because they are intended to help only the requesting organization. Formal program evaluations are broader scope studies which require formal responses and followup. They said the FOIA evaluation was initiated as a management assistance review at the request of the Administrative Counsel.

## LITTLE CHANGE IN RESOURCES OR POLICY, BUT SOME IMPROVEMENT IN OPERATIONS

DOJ resources and policy applicable to FOIA activities have not changed significantly in recent years. However, the processing of requests had improved through some operational changes. The use of automatic data processing equipment had increased, especially at the FBI. Also, the Civil Rights Division had recently implemented several administrative changes, and two other units we reviewed had adopted a team approach to processing requests.

#### No significant resource or policy changes

Overall, no significant resource or policy changes had been made since the Justice Management Division issued its evaluation of FOIA administration in October 1980. Officials in the six units told us that their resources have remained at approximately the same levels during the last few years. Similarly, neither overall DOJ policy nor individual unit policies had changed substantially during the same period. Overall DOJ policy is included in DOJ regulations. The FBI had written policies implementing these regulations, but written policies in the other units generally were limited. Although DOJ regulations pertaining to the FOIA and Privacy Act have remained basically unchanged in the past several years, revision of these regulations was underway as discussed earlier.

#### Some operational improvements

In each of the units reviewed, operational changes had improved or were likely to improve the processing of requests.

These included changes in data processing equipment, administration, and organization.

For example, the FBI had streamlined its handling of requests by automating parts of the process. Overall processing time declined from an average of 257 days in October 1981, to 194 days in January 1983. Civil Rights Division officials told us the FOIA office had recently begun to implement a number of management and administrative changes in response to an April 1982 Justice Management Division report. These changes included consolidating processing steps and establishing a more complete case management system.

Also, two units had adopted a "team" approach to processing requests under which a more experienced document analyst exercised a first-line review and supervision function over a small group of other analysts. Officials from both the Antitrust Division and the Criminal Division said this approach had improved processing.

In addition, four units besides the FBI had acquired or plan to acquire computer terminals and/or word processing equipment. Officials in two units which already had such equipment told us that it had improved processing and reporting.

Finally, we noted that all but one of the units were beginning to experience a slight decline in the volume of requests. Continuation of such a trend could affect unit operations and improve responsiveness.

As arranged with your office, we plan no further distribution of this report until 30 days from the date of the report unless you publicly announce its contents earlier. At that time we will send copies to interested parties and make copies available to others upon request.

Sincerely yours,

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William J. Anderson Director

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