

Office of  
**INSPECTOR GENERAL**

*Audit Report*

*Review of the Use of Copy Machines  
by Non-USITC Personnel*

*Report No. IG-05-90*



*July 1990*

Date Issued





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UNITED STATES INTERNATIONAL TRADE COMMISSION

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WASHINGTON, D.C. 20436

July 5, 1990

**REVIEW OF THE USE OF COPY MACHINES  
BY NON-USITC PERSONNEL**

The purpose of this review was to evaluate the applicable Commission policies and practices concerning the use of copy machines by non-USITC personnel in order to identify any areas of non-compliance with Federal laws or regulations, improvements to internal controls, or ways to increase efficiency.

We believe the Commission is required to ensure that copy machines are only used for officially approved activities, and that when these activities are not official business the cost to the government should be minimized. We found that several offices have routinely allowed members of the public to use Commission copy machines to copy various documents at no charge, of which only a minor portion could be classified as official business. We also found that, prior to recent changes in security procedures, unauthorized use was possible due to minimal controls over access to the machines.

In addition, the purchase of a copy machine for Library Services was approved even though the purchase was not adequately justified. The actual purchase has been deferred until more justification is developed.

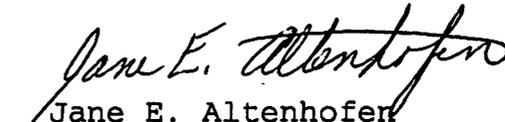
The Commission is now in compliance with Federal laws that require libraries accessible to the public to display a copyright notice to avoid liability for copyright infringement due to unsupervised use of reproducing equipment.

We recommend that the Director, Office of Administration:

- Develop a policy on the appropriate use of copy machines which should be distributed to all employees;

- Review the various options available and select the most efficient, economical and effective method or methods of providing copy service to the public; and
- Defer purchase of a copy machine for Library Services until adequate justification is developed.

The Director, Office of Administration agreed with our findings and recommendations, and has already started to take appropriate actions. His comments are discussed in more detail on pages 8 and 9, and presented in their entirety as an Appendix to this report.

  
Jane E. Altenhofen  
Inspector General

**TABLE OF CONTENTS**

INTRODUCTION AND SCOPE . . . . . 1

BACKGROUND . . . . . 2

FINDINGS AND RECOMMENDATIONS . . . . . 3

USE OF COPY MACHINES FOR UNOFFICIAL PURPOSES . . . . . 3

    Officially Approved Use . . . . . 4

        Office of Administrative Law Judges . . . . . 4

        Library Services . . . . . 4

        Law Library . . . . . 5

        Office of the Secretary. . . . . 5

    Provision of Pay Copier Service . . . . . 6

    Unauthorized Use . . . . . 7

    Recommendations . . . . . 7

    Commission Comments . . . . . 8

PROPOSED PURCHASE OF A COPY MACHINE . . . . . 8

    Recommendation . . . . . 9

    Commission Comments . . . . . 9

COPYRIGHT NOTICES . . . . . 9

Appendix - Response to Draft Report from Acting Director,  
Office of Administration

## INTRODUCTION AND SCOPE

The Office of Inspector General (OIG) has completed a review of the use of copy machines by non-USITC personnel. This review was not part of the fiscal year 1990 Audit Work Plan, but was scheduled after the OIG received several complaints that non-USITC personnel were improperly using the copy machines. The purpose of this review was to evaluate the applicable Commission policies and practices concerning the use of copy machines by non-USITC personnel in order to identify any areas of noncompliance with Federal laws or regulations, improvements to internal controls, or ways to increase efficiency.

Our review was conducted in April 1990. The audit was performed at USITC headquarters in Washington, D.C., in the Office of Management Services (OMS) and Library Services within the Office of Administration, the Law Library in the Office of General Counsel, Office of the Secretary, and the Office of Administrative Law Judges (ALJ). We interviewed employees with responsibility for managing the copy machines, representatives in offices we thought were most likely to have visitors making copies, and employees who had observed potentially abusive use.

In reviewing the use of government photocopy machines by nongovernment personnel, research was conducted on the existence of applicable laws or regulations, including the United States Code, the Code of Federal Regulations, case law, legal treatises, Office of Management and Budget circulars, and General Accounting Office decisions. We reviewed guidance issued by the General Services Administration (GSA), including a booklet entitled "Copy Management". We found that USITC does not have a Commission-wide policy on the use of copy machines, although Library Services had internal office procedures addressing the use of copy machines by non-USITC personnel.

We contacted several Federal agencies, including the Departments of Commerce, Labor and Agriculture, the Library of Congress, Federal Communications Commission, and U.S. Courts, to determine the policies and procedures of other Federal agencies concerning the use of copy machines by non-Federal personnel. We also contacted a business firm that supplies copy equipment and services.

This review was performed in accordance with generally accepted government auditing standards. Accordingly, the review included an examination of internal controls and other auditing procedures that were considered necessary under the circumstances.

## BACKGROUND

In late 1989, we received several complaints that non-USITC personnel were improperly using copy machines, particularly in room 212. The copying was supposedly connected with the ALJ hearings, although in one instance documents were copied and taken out of the building reportedly for a District Court filing. Visitors allegedly used the copy machines for hours at a time, and had, in at least one instance, insisted that a Commission employee who was copying official business get off the machine.

We decided not to pursue an investigation of the visitors that may have been involved in these instances. In our opinion, a successful case of misusing government property could not be developed considering that all visitors had ready access to the copy machines, and hearing participants were told they could copy documents in room 212. However, we did think the Commission policy and procedures needed to be evaluated and, accordingly, scheduled this review.

OMS is responsible for providing management and administrative support to ensure the efficient day-to-day operation of the Commission. These support services include responsibility for the operation of copy services.

As of March 1990, the Commission operated 45 copy machines with a projected annual cost for maintenance of about \$188,000. The projected total number of copies for the current fiscal year is about 13 million. These machines are primarily for the use of USITC personnel in conducting official business. However, several offices commonly have visitors who have been allowed to use the copy machines.

## **FINDINGS AND RECOMMENDATIONS**

We believe the Commission is required to ensure that copy machines are only used for officially approved activities, and that when these activities are not official business to minimize the cost to the government. We found that several offices have routinely allowed members of the public to use Commission copy machines to copy various documents at no charge, of which only a minor portion could be classified as official business. We also found that, prior to recent changes in security procedures, unauthorized use was possible due to minimal controls over access to the machines.

In addition, the purchase of a copy machine for Library Services was approved even though the purchase was not adequately justified. The actual purchase has been deferred until more justification is developed.

The Commission is now in compliance with Federal law that requires libraries accessible to the public to display a copyright notice to avoid liability for copyright infringement due to unsupervised use of reproducing equipment.

### **USE OF COPY MACHINES FOR UNOFFICIAL PURPOSES**

Federal law prohibits employees from using government "property of any kind for other than officially approved activities," and requires employees to "protect and conserve" all government equipment and supplies entrusted to them. 18 U.S.C. 201 note. This standard is implemented in the Commission's rules for employee conduct. 19 C.F.R. 200.735-108. We interpret the applicability of this law to copy machines, which are government property, as requiring the Commission to ensure that the machines are only used for officially approved activities. These activities consist of official business, for which the Commission should bear the costs, and approved unofficial business, which should be provided at minimal or no cost to the government.

We found that several offices have routinely allowed members of the public to use Commission copy machines to copy various documents at no charge. Only a minor portion of this usage could be classified as official business. Copy services provided that were not classified as official business were valued at nearly \$4,000 annually. We also found that unauthorized use was possible due to minimal controls over access to the machines. We believe recent changes in security procedures will adequately deter the unauthorized use.

## **Officially Approved Use**

Several offices have routinely allowed members of the public to use Commission copy machines to make photocopies of various documents at no charge. This situation exists because the Commission has not devised a system for charging members of the public for photocopying. While some of this use may be interpreted as official business, most could not be so classified. Complete records have not been maintained on the number of copies made by the public, but we estimate the value of copies made for unofficial purposes is about \$4,000 annually.

The policies of offices allowing visitors to use the copy machines are discussed below.

### **Office of Administrative Law Judges**

Hearing participants are notified in a pre-hearing order "Submission of Trial Memoranda and Exhibits" that they are required to submit multiple copies of documentary exhibits. An ALJ representative said that they have always had an unwritten policy that when an unanticipated exhibit is introduced at a hearing, copies are allowed to be made by the participant for all parties. Until recently, ALJ instructed the participants to use the copy machine in room 212 to make these copies because the copy machine in their office had limited capacity. In April, the copy machine in the ALJ was replaced with a larger capacity machine which is used by the hearing participants when the need arises.

Normally, the ALJ has one hearing a month. They estimated that from six to ten times during a hearing, copies of about five to ten pages are made at government expense. A total of one hundred pages might be copied during a hearing. Using 15 cents per copy, which was established by OMS as the "going rate" for copies in Washington, D.C., we estimated the annual value of copies made by the hearing participants to total about \$180.

### **Library Services**

The Commission's library is open to the public. Current procedures provide for making photocopying facilities available to the public at no charge with the following restrictions: (1) only library research materials may be copied; (2) not more than 20 pages per daily visit may be copied; and (3) the visiting researcher will not return repeatedly to use the machine over a period of days.

The library has one copy machine which is used by the library staff and the public. Public researchers must complete a request form and give it to a reference librarian before they use the copy machine. After the material is copied, it must be taken to the reference desk so the

library staff can count and verify the number of pages. Library records indicated that during the period October 1, 1989 through March 30, 1990, 160 members of the public used the photocopy machine to make 2,731 copies (of a total 38,403 copies made during this period). The Chief, Library Services expressed the opinion that members of the public would use the machine more extensively if the library staff did not limit them to 20 copies. Using the going rate of 15 cents per copy, we estimated the projected annual value of copies made by members of the public to be about \$819.

#### Law Library

Members of the public are given unrestricted and unsupervised access to the copy machine located in a separate room (labeled copy room) at the back of the Law Library. Some members of the public ask before using the machine, however, users of the machine cannot be observed from the library front desk. Library personnel said that the heaviest use of the machine was for copying Commission reports. Other uses are copying briefs and loose leaf material.

Law library personnel estimated that about 25 percent of the total use of the machine was by non-USITC personnel. Using OMS figures for total usage of the Law Library machine, we estimated that about 14,000 copies in fiscal year 1989, and about 10,376 copies through March in fiscal year 1990, have been made on the Law Library's copy machine by non-USITC personnel. At 15 cents per copy, the projected annual value of copies made by non-USITC personnel totals about \$3,112.

#### Office of the Secretary

Members of the public are not allowed access to copy machines in this office. They can review the Public Inspection Files and indicate which documents they want copied. For the past four years, the Commission has had an arrangement with a commercial firm whereby they make the copies and the public purchases the copies directly from the firm. Prior to this arrangement, the documents were released pursuant to the Freedom of Information Act (FOIA) and the public was charged accordingly.

We believe that the use of the copy machines as described by the ALJ could be construed as official business as it is in the best interest of the government for the hearings to run smoothly. However, we believe the use of the copy machines in the libraries by members of the public is not official business, since it is not necessary for conducting government business. Public use of the copy machines for unofficial purposes results in increased wear and tear on the machines and increased maintenance which are costs that should not be borne by the government.

## Provision of Pay Copier Service

The Commission could choose to not provide copy service to the public. However, we believe the availability of this service may serve government purposes if the access to copy machines prevents the theft or mutilation of unique collections. Charging for copies would compensate for the increased maintenance costs associated with the increased use, and would be consistent with the requirement to conserve and protect government property.

At one time, Library Services did charge for copies. Library Services charged the public 10 cents per page for copies of the specialized international trade and tariff information contained on the shelves of the library. About five or six years ago, the Office of Finance and Budget reportedly instructed the library not to charge for any copy work under \$25, and since then no money has been collected. (Note: During the past several years, the Law Library asked the Office of Finance and Budget several times whether they should charge for copies and were advised not to do so.)

We found that other government agencies, including the Library of Congress, Federal Communications Commission, and Departments of Commerce, Labor and Agriculture, used various methods to provide pay copy service in their public libraries. Some options which could be used by the Commission are listed below.

- o Cash and checks can be accepted as direct payment for copy services at locations where the services are provided.
- o Copy centers staffed with contractor or agency personnel can copy documents for a fee.
- o A charge card system, similar to a Metro fare card, can be implemented. Cards can be purchased for various amounts and inserted in the copy machines to make copies. Charges per copy are automatically deducted from the total amount shown on the card.
- o Accounts receivable can be established and maintained with the Auditron system for frequent repeat users.
- o Coin operated copy machines can be purchased, leased or supplied by a vendor. Coin-operated machines can be purchased for as little as \$5,000, with maintenance purchased separately. A vendor can supply a copier, maintenance and supplies free of cost, if the copier generates at least 4,000 copies per month at 15 cents per copy.

We believe the provision of pay copier service could also benefit the Commission and its employees. Currently, some employees that need to make personal copies may feel justified in using the

agency machines as pay copy service is not available. Providing such service and clarifying the policy on making copies may result in an added benefit of reducing use of the copy machines for unofficial business by USITC employees.

Funds collected for copy services cannot be retained by the Commission unless special appropriation language is approved. Normally, such funds collected must be deposited in the U.S. Treasury as miscellaneous receipts. We realize the collection of funds for copy services can place an administrative burden on Commission personnel, however, the alternative of not collecting such funds places the Commission in a position of allowing Government property to be used by members of the public without appropriate reimbursement. The administrative burden should be taken into consideration when deciding whether to provide copy services.

### **Unauthorized Use**

Until recently, once a visitor had access to the building, they had easy access to multiple copy machines. Nearly every floor has multiple machines in a separate room that is not under the direct observation of a USITC employee. Although virtually all of the machines that were most accessible to the public had an Auditron feature, which limits access to the machine to those with a keying device, this control was not activated on any of the machines.

The extent to which unauthorized copying occurred cannot be estimated with any accuracy. The copy machine in room 212, which is on a floor frequently used by visitors to the ALJ, was observed as the location of several instances of potential misuse.

Several actions have been taken that should prevent this type of abuse from happening again. The Auditrons were activated on the copy machine in room 212 and a machine recently installed in the ALJ. The glass hallway doors have been secured on the fourth through seventh floors which will make unaccompanied access to those machines more difficult and deter unauthorized use of those machines.

### **Recommendations**

We recommend that the Director, Office of Administration:

1. Develop a policy on the appropriate use of copy machines which should be distributed to all employees; and
2. Review the various options available and select the most efficient, economical and effective method or methods of providing copy service to the public.

## **Commission Comments**

The Director, Office of Administration has agreed to develop a policy and set of procedures for distribution to all employees concerning the appropriate use of copiers by non-USITC personnel.

He has also agreed to make a thorough analysis and review the options available for providing copy service to the public. This analysis will consider the possibility that allowing the public to make copies of material in the Commission's two libraries personnel may save the government money since it lessens the possibility of FOIA request filings. The Director opines that if the Commission makes it difficult for people to use copiers it is possible that FOIA requests will increase and the Commission will incur additional administrative costs to process the requests.

We agree that the impact on FOIA requests should be considered, but our analysis indicates the impact would not be significant. FOIA requests are generally submitted for agency records, not library-shelf material. The majority of agency records being copied are the Commission reports in the law library which are available upon request from the Secretary. We doubt that the public would rather submit a written FOIA request and wait at least ten days for processing than to pay for copy service. In fact, the Commission's experience in the Office of the Secretary was a decrease in FOIA requests when pay copy service was made available.

The Director of Personnel also suggested that we use a rate of 10 cents per page rather than 15 cents to estimate the value of the copies made. The 10 cent rate was developed for FOIA requests and the 15 cent rate was determined by OMS to be a standard charge for making copies. Since we estimated the value of the copies rather than the cost to the government, we believe the 15 cents per page rate is more appropriate.

## **PROPOSED PURCHASE OF A COPY MACHINE**

The Commission was planning to purchase a photocopier machine for Library Services that has a pay attachment. This machine was not justified in accordance with Commission or GSA guidelines.

There is only one copy machine in Library Services which is used by the public and USITC employees. OMS records showed that a total of 38,403 copies were made on this machine during a six month period, of which 2,731 were made by the public.

In April 1990, the Director of Administration approved the purchase of a new copy machine for Library Services with an estimated cost of \$13,000 plus monthly maintenance fees of at least \$180. The new machine has additional features including the capability of making copies in three sizes, enlarging and reducing copy, and had a pay attachment that would give change

for bills and coins. The actual purchase of this machine was put on hold pending the results of our review.

The purchase requisition gives the reason for request as "To provide better service to library patrons." Other documents provided pertaining to this requisition were memoranda that generally discussed the purchase but did not provide additional justification. Without documentation, we could not determine whether the copy machine features were being requested due to the needs of the library staff or the public.

USITC Directive 3550 states that the need to purchase new property must be defensible, documented, and approved by agency officials. The Directive does not further define defensible and documented, but fairly specific guidance is provided by GSA on support needed to purchase a copy machine.

GSA regulations (41 CFR 201-45.106) and supporting guidelines state that equipment specifications should be developed for each copying station. This involves a determination of the various equipment types, production capabilities, and special features and accessories that will be needed to satisfy all copying requirements. In addition, prior to obtaining copier equipment, managers should consider the lease vs. purchase question and do a thorough cost analysis to ensure the most economical method of acquisition.

### **Recommendation**

We recommend that the Director, Office of Administration continue to defer purchase of a copy machine for Library Services until a justification in accordance with the GSA guidelines is submitted to OMS.

### **Commission Comments**

The Director, Office of Administration has agreed that justification in accordance with GSA regulations will be developed before the purchase is made.

### **COPYRIGHT NOTICES**

Under copyright law, a library accessible to the public may avoid copyright liability for unsupervised use of reproducing equipment if it displays a notice that making photocopies may be subject to the copyright law 17 U.S.C. § 108(f). The Commission is now in compliance with this law.

The main library is open to the public and the use of its photocopy machine is unsupervised. Since at least 1979, the library has posted a notice above the machine which states:

NOTICE

THE COPYRIGHT LAW OF THE UNITED STATES (TITLE 17 U.S. CODE) GOVERNS THE MAKING OF PHOTOCOPIES OF COPYRIGHTED MATERIAL. THE PERSON USING THIS EQUIPMENT IS LIABLE FOR ANY INFRINGEMENT.

We believe this notice, which is identical to those posted on the machines at the Library of Congress, complies with the law and eliminates liability for copyright infringement by members of the public.

The Law Library is also open to the public and use of the copy machine is not monitored. At the time of our review, the Law Library did not display a copyright notice. When we discussed this with the Law Librarian, he took immediate action to post an identical notice to the one shown above.

The law is silent concerning copy machines not located in a library that are accessible to the public. We believe it is a good idea to have such a sign on all machines accessible to the public. During May 1990, the OMS placed such a sign either on or above all copy machines in the Commission.



UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

June 26, 1990

MEMORANDUM

TO: Inspector General

FROM: Acting Director, Office of Administration

SUBJECT: Draft Report, "Review of the use of Copy Machines by Non-USITC Personnel"

A handwritten signature in black ink, appearing to read "Larry D. Meyer", is written over the "FROM:" line.

As requested by your memoranda dated May 24, 1990 (IG-N-046 and IG-N-047), submitted as an attachment to this memorandum is the Office of Administration's response to the subject draft audit report issued on May 24, 1990. In accordance with Section 11 of the USITC Directive 1701, the Commissioners have had an opportunity to comment on the response and the Chairman has approved it.

Please call me at 252-1131 or Bill Stuchbery at 252-1135 if you have any questions.

Attachment

cc: The Commission  
General Counsel  
Chief, Administrative Law Judge  
Chief, Law Library  
Chief, Library Services  
Secretary  
Director, Office of Finance and Budget  
Director, Office of Management Services



## UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

## MEMORANDUM

June 19, 1990

TO: Acting Chairman Brunsdale

FROM: Director, Office of Administration

*L. M. S. Lodwick*

SUBJECT: Approval of Administration's Comments of the Inspector General's Draft Audit Report: "Review of the Use of Copy Machines by Non-USITC Personnel"

On May 24, 1990, the Inspector General submitted copies of the subject audit to each Commissioner by memorandum (IG-N-047). The IG also requested Administration to review the draft audit report and make comments if necessary. In accordance with Section 11 of USITC Directive #1701, "Audit Policies and Procedures", the Office of Administration has sent its comments in draft to the Commissioners, other than you as Chairman, for review. There were no comments submitted by the deadline of June 18, 1990. Confirmation with the staff assistants of Commissioner Eckes, Rohr, Newquist, Cass and Lodwick was made.

Also, in accordance with Section 11 of USITC Directive #1701, submitted herewith are Administration's comments for your approval before they are sent to the Inspector General and a copy of the draft audit report. Since the IG has set a deadline of June 25, 1990 for receiving a final response, it would be appreciated if you could indicate your approval, or modification, by the close of business Friday, June 22, 1990.

Approved: ✓

Modify as follows: \_\_\_\_\_

*Anne Brunsdale*

Acting Chairman

6/24/90

Date

Attachments

U.S. INTERNATIONAL TRADE COMMISSION

Office of Administration's Response to the May 24, 1990,  
Draft Audit Report "Review of the Use of Copy  
Machines by Non-USITC Personnel"

Recommendation 1--

The Director, Office of Administration, should develop a policy on the appropriate use of copy machines which should be distributed to all employees, such as through an Administrative Announcement.

AGREE (with technical correction). A policy and a set of procedures can be developed for distribution to all employees concerning the appropriate use of copiers by non-USITC personnel. This policy would be issued in an USITC Directive, not an Administrative Announcement. Administrative Announcements are used to advise all Commission staff of general interest or for reminders of existing policies.

This policy must take into consideration the need for the Commission to allow copying to take place by the public when it facilitates the work of the Commission. The Inspector General concluded during the review that the ALJ's practice of allowing parties at a hearing to use copying machines at no charge was appropriate. There are most likely other circumstances when the use of Commission's copies by non-USITC personnel can be determined to be "Official Business".

Recommendation 2--

The Director, Office of Administration, should review the various options available and select the most efficient, economical and effective method or methods of providing copy service to the public.

AGREE. The Director, Office of Administration will review the options. As a part of his review there must be taken into account the Commission's required responsibility to make available copies of agency records under the Freedom of Information Act (FOIA). There are certain documents which we must make available by law whether they have originated at the Commission or by others.

As recommended by the Inspector General the options to be explored should consider efficiency, economy and effectiveness. We need to make thorough analysis, however, it is possible that allowing the public to make copies of material in the Commission's two libraries non-USITC personnel may be saving the Government money since it lessens the possibility of FOIA request filings. If we make it difficult for people to use copiers it is possible that FOIA requests will increase and we will incur additional administrative costs to process them. The generation of a few additional fees may not offset the additional cost. We will have to study this matter fully.

Recommendation 3--

We recommend that the Office of Administration continue to defer purchase of a copy machine for Library Services until a justification in accordance with GSA guidelines is submitted to OMS.

AGREE. Justification in accordance with GSA regulations will be developed before the purchase is made. For the record, considerable research and analysis has already been conducted and the earlier decision was not made without foundation. Representatives from Library Services and OMS saw demonstrations of copy machines which could have a pay-copy feature added onto them. Literature pertaining to machines and vendor services were also collected and studied. We have been looking for a single machine which would accommodate the needs of Library Services staff, Commission staff and the public. At the time the requisition was made by Library Services only one machine met the technical needs for all three groups of users. A substantial amount of research was performed during the acquisition development stage; the requisition was merely the end product of considerable preparation.

General Comments and observations of the draft report

1. On page 3 there is a statement that "The Commission is now in compliance with Federal law that requires libraries accessible to the public to display a copyright notice to avoid liability for copyright infringement due to unsupervised use of reproducing equipment." This statement suggests that there had not been any compliance in the past; Library Services has had the appropriate sign posted for many years and such a sign existed at the time the Office of Inspector General conducted its fieldwork. It would be appreciated if this situation were recognized at this point in the report.

Additionally, the Law Library immediately placed an identical sign by its copier when the OIG staff mentioned the situation.

2. Copier costs per page --

Throughout the draft report a cost of 15 cents per page is used by the Inspector General which is based on a rate furnished to the Procurement Division by vendors who would provide a coin operated copier machine and associated maintenance and supplies. Actually we feel a fairer representation of the per page cost would be 10 cents since there is in all likelihood overhead and profit factors included in the 15 cent amount supplied by vendors.

The Commission, in approving its rules (19 C.F.R. 201.20(b)(2))

had determined that 10 cents per page is the appropriate rate. This rate is based on calculations by the Office of Finance and Budget, using actual agency costs for equipment, supplies and personnel. The rate was established approximately 12-14 years ago and the calculation have been redone several times to ensure that it was still valid. Recent bids for outside copying (Secretary's office) were, in many cases, at or below the rate of 10 cents per page.

The rate of 10 cents per page could be reduced even further when calculating the value of the copies made by non-USITC personnel. As noted above, the F&B calculations included a charge for USITC employees. The copies made by outsiders do not necessarily involve our staff.

In order to more accurately reflect the cost of the copies made by non-USITC personnel the costs of copies made by the public cited in the report are more accurately reflected at approximately \$2,700 instead of \$4,000 on an annual basis.

