

Americans For Limited Government Foundation

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February 23, 2016

David Smith Acting Inspector General U.S. Department of Commerce Office of Inspector General 1401 Constitution Avenue N.W. Washington, DC 20230

Via online submission

Re:Request for Investigation - Improper Premium Travel by NationalTelecommunications and Information Administration; AntideficiencyAct Violations

Dear General Smith:

I write today to bring to your attention a matter requiring investigation by your office pursuant to the power granted to you by Congress in the Inspector General Act of 1978, 5 U.S.C. App. § 1 *et seq*. This matter involves the unauthorized expenditure of appropriated funds.

Federal employees are generally prohibited from purchasing "premium" airfare, except in tightly limited circumstances. As will be shown below, an official of the National Telecommunications and Information Administration (NTIA) recently violated this prohibition by purchasing business class airfare to fly to a conference, incurring substantial expense to the taxpayers in the process. Additionally, the conference to which this official was traveling was organized, for among other reasons, to discuss NTIA relinquishing certain responsibilities. Congress in the appropriations for the Department of Commerce for Fiscal Years 2015 and 2016 included a rider which specifically prohibited NTIA from relinquishing these responsibilities. Despite the explicit prohibition from Congress, the activities of officials at NTIA clearly indicate that they are working hard to ensure that the relinquishment occurs. As such, an investigation by your office into these issues is necessary to determine whether these actions also violate the Antideficiency Act.

Legal Standards

Federal Travel Regulations

The Federal Travel Regulations are found at 41 C.F.R. subtitle F. In general, the regulations prohibit the purchasing of "other than coach" airfare, except in tightly limited circumstances. "For official business travel, both domestic and international, you must use coach-class accommodations, except as provided under §§ 301-10.123 and 301-10.124." 41 C.F.R. § 301-10.122.

The situations in which other than coach airfare may be purchased include those such as where there are no coach airfare accommodations reasonably available, there is a medical issue or disability, "exception security circumstances" so require, and certain long-distance situations where the flight time will be longer than fourteen hours. 41 C.F.R. §§ 301-10.123, 301-10.124.

In order to avail oneself to the "14-hour rule" (1) either the origin or destination must be outside of the continental United States; (2) the flights must be in excess of fourteen hours; and (3) the employee must be required to work the following day or sooner. 41 C.F.R. § 301-10.125.

These regulations are incorporated into the Department of Commerce's *Department Travel Handbook*, at Sec. C301-10-120 *et seq*.¹

A rule of thumb is "travelers are told to exercise the same standard of care in incurring expenses that a prudent person would exercise if traveling on personal business."²

Employees who improperly purchase other than coach airfare are liable for the added expense as detailed at 41 C.F.R. § 301-10.6, "any additional expenses you incur which exceed the cost of the authorized method of transportation <u>will be borne by you</u>." (Emphasis added.)

Appropriations Issues

The U.S. Constitution in Article I, Sec. 9, Clause 7 states, "No Money shall be drawn from the Treasury, but in Consequence of Appropriations made by Law."

¹ The *Department Travel Handbook* is available online at: http://www.osec.doc.gov/ofm/OAP/TMD/Documents/Travel%2

http://www.osec.doc.gov/ofm/OAP/TMD/Documents/Travel%20Handbook%20June%2008.pdf (accessed February 22, 2016).

² Premium Class Travel, Internal Control Weaknesses Governmentwide Led to Improper and Abusive Use of *Premium Class Travel*, U.S. Government Accountability Office, September 7, 2007, at p. 2. Available online at: <u>http://www.gao.gov/new.items/d071268.pdf</u> (accessed February 22, 2016).

General Smith

Title V, Sec. 539 of the Consolidated Appropriations Act of 2016, Public Law 114-113 prohibits the relinquishment of "the responsibility of the National Telecommunications and Information Administration, during fiscal year, 2016, with respect to Internet domain name system functions, including responsibility with respect to the authoritative root zone fine and the Internet Assigned Numbers Authority functions." The same prohibition was present in the appropriations for 2015.³

The Antideficiency Act at 31 U.S.C. § 1341(a)(1)(A) states that the federal government cannot, "make or authorize an expenditure or obligation exceeding an amount available in an appropriation fund for the expenditure or obligation."

An agency official violates the Antideficiency Act when they expend appropriated funds in violation of prohibitions in the appropriations act, "as the agency's appropriations were not available for these prohibited purposes.⁴

Federal officials who "knowingly and willfully" violate this prohibition commit a criminal offense and are subject to punishment of a fine of not more than \$5,000 and a maximum jail term of two years.⁵

Facts

The following information comes from records that were provided to Americans for Limited Government Foundation by NTIA in response to a Freedom of Information Act request.⁶

On October 9, 2015 Suzanne Murray Radell, Senior Policy Advisor in NTIA/OIA, submitted a request on Department Form CD-334 for "approval of other than coachclass accommodations."⁷ The request was for business class airfare for Radell to attend the ICANN 54 conference in Dublin, Ireland. The difference between business class and coach airfare, as noted in Sec. 15 of the Form CD-334, is substantial. Coach airfare to this destination was \$995, and business class airfare \$7,188.90, a difference of \$6,193.90. In Sec. 13 of the Form CD-334 where the agency is supposed to list the justification for the expenditure NTIA failed to list any justification at all. Instead, a conclusory statement that the request had been granted is the only "justification" provided. The request was approved the same day it was submitted. Also of note, the signature on the form does not appear to be that of Leonard Bechtel, the named authorizing official, but rather a different name.

³ Public Law 113-235, Title V, Sec. 540.

⁴ Letter from General Accountability Office to Sen. Inhofe regarding Environmental Protection Agency, Application of Publicity or Propaganda and Anti-Lobbying Provisions, December 14, 2015, at p.2. ⁵ 31 U.S.C. § 1350.

⁶ NTIA FOIA 16-018.

⁷ See, Appendix 1.

Per Radell's OIA Travel Request Form, the dates of her travel were October 14, 2015, a Wednesday through October 25, 2015, a Sunday.⁸ The form also indicates that Radell took October 23, 2015, a Friday, as a personal day, presumably to vacation on Friday and Saturday before returning on Sunday.

Among other things, the ICANN conference Radell attended had a session on "IANA Stewardship Transition Implementation."⁹

The "IANA Stewardship Transition" refers to the plan of the Department of Commerce to relinquish its Internet Assigned Names and Numbers Authority to some yet to be determined international multi-stakeholder body:

In the United States, we are committed to multistakeholder Internet governance, as convincingly demonstrated by our announcement in March 2014 that the U.S. government would transition its historical stewardship role over the Internet Domain Name System to the multistakeholder community¹⁰

Additionally, the NTIA provided us with a spreadsheet totaling the costs associated with other NTIA personnel, including the Assistant Secretary, who attended the conference.¹¹

The total amount of appropriated funds that are being expended by NTIA to continue its efforts to relinquish its responsibilities are unknown at this point, but the agency is clearly expending appropriated funds for this purpose.

<u>Analysis</u>

Travel Regulation Violation

Given the conclusory nature of the statement on Sec. 13 of the Form CD-334, it is impossible to ascertain the exact justification supporting the decision of NTIA to allow premium travel in this instance.

¹⁰ Remarks of Lawrence E. Strickling, Assistant Secretary of Commerce for Communications and Information, Internet Governance Forum, November 10, 2015. Available online at: <u>https://www.ntia.doc.gov/speechtestimony/2015/remarks-assistant-secretary-strickling-internet-governance-forum-jo-o-pessoa-br</u> (accessed February 22, 2016).

¹¹ See, Appendix 3.

⁸ See, Appendix 2.

⁹ ICANN Public Meetings, ICANN 54, Dublin, IANA Stewardship Transition Implementation October 21, 2015. Available online at: <u>https://meetings.icann.org/en/dublin54/schedule/wed-iana-stewardship-implementation</u> (accessed February 22, 2016).

Assuming for the sake of argument that the justification was not security or medically related, it is possible that NTIA misapplied the "14-hour rule" in this instance. The OIA Travel Request Form filed by Radell indicates that the total time of the outbound leg of the trip was to take 13.9 hours and the return leg 15.7 hours. Of this travel time less than fourteen hours on both legs was to be expended in flight time and airport wait time, the portions of travel time that are applicable to determining whether the "14-hour rule" applies. Thus, this trip was not eligible for premium travel. Also worth noting, Radell apparently voluntarily altered her schedule to return home on a Sunday rather than on Friday, a day for which she took personal leave. Under the Federal Travel Regulations, if a traveler is not required to report to work the next day then the trip is not eligible for premium travel under the "14-hour rule."¹² If Radell had returned on Friday rather than taking leave, she presumably would not have been required to report for work on the next day or even the day following that. If Radell was required to report to work on the Monday following her travel back and that requirement was part of the justification for allowing the use of premium travel to return, then that justification is faulty as it was Radell's own choice that put her into the position of returning to work the next day.

Again, due to the lack of a stated justification, it is impossible to determine the intended justification. In any event, the lack of a clearly stated justification is evidence of an internal control weakness that should be immediately remedied.

Appropriations Issues

As Congress has directly prohibited the Commerce Department from relinquishing its responsibilities as described above, your office should take a look at whether the attendance at the ICANN 54 conference by NTIA personnel constitutes a violation of the Congressional command.

The actions of officials in the National Telecommunications and Information Administration (NTIA) in many instances have been directly in conflict with the appropriations language that was enacted into law by Congress. Congress prohibited relinquishing the NTIA responsibilities detailed above, yet NTIA continues to act as if that prohibition does not apply to them by participating in conferences such as the ICANN 54 conference.

These actions constitute an expenditure of appropriated funds, to cover employee and other costs, for a prohibited purpose. Spending appropriated funds for a prohibited purpose violates the Antideficiency Act.

Therefore, NTIA officials have violated the Antideficiency Act by the expenditure of funds in the instances detailed above.

¹² 31 C.F.R. § 301-10.125(a)(3).

Conclusion

Based on the foregoing I request that you open an investigation into the information discussed above. I request that you investigate whether violations of the Federal Travel Regulations were committed by NTIA and that you investigate other actions NTIA is taking to relinquish its responsibilities as discussed above, and take further appropriate action to ensure that taxpayer funds are protected and not spent in violation of the law.

Thank you in advance for your assistance with this matter.

Sincerely, lathan Tau

Nathan Paul Mehrens President and General Counsel

Appendix 1
Appendix I

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Rev. 7-11)	UEST FOR AP		.S. Department of Cor F OTHER THAN (COMMOD	ATIONS
. Name of Traveler			2. Title				Date of Request
Suzanne Murray Rad			Senior Policy	Advis	or		10/9/2015
I. Bureau Name/Organizati	onal Unit		5. Present Official	Station		6.	Office Phone Number
			Washington [DC			202-482-3167
'. Travel Order Number			8. Period of Travel		Beginning Date	En	ding Date
D00005195				\rightarrow	10/14/2015	10)/24/2015
9. Mode of Travel Air S	hip Tra	ain	10. Travel Purpose	Code		11.	Travel Exception Code
2. Itinerary (as shown on f					·		
Washington DC to [Dublin, Ireland	and return				•	
3. Specific Justification fo (Must comply with the F Traveller's request f	-ederal Travel Re	gulation refer	enced at 301-10.123-1	25, 301	-10.162, or 301-	-10.183)	mp.
3)							
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14. Name of Carrier(s) and			12	15.	Costs-Specify	One	Way or Round Trip
United Airlines 3876 United Airlines 127		pund			Costs of Extra I	Fare	\$ <u>7,188.90</u>
							005.00
					Cost of Coach I		\$ 995.00
16. Indicate where Other TI difference between other to	han Coach-Class	Accommodal	ions Travel Segments		Additional Cost , end, and cost	-	\$
Drigin	Destination		Other than Coach Fa		Coach Fare		
(1) Washington DC	Newark, NJ		Other Mail Coach Fr		Coach Fare		Difference in Fares
(2) Newark, NJ	Dublin, Irela						
(3) Dublin, Ireland	Washingtor		\$7,188.90		\$9	95.00	\$6,193.90
(4)							
(5)							2
Totals		>					
17. Printed Name, Signatur	re, and Title of Re	equesting/App	proving Official				
Particular of Phase of	1		····				
Printed Name			Signatur	e and 1	Title		Date
I8(a). Assistant Secretary		on or Designe	e s	Signatu	re of Authorizir		
Approved as M	odified Below	Leonard Be		10/9/	2015	nan	erium 10/9/2016
Disapproved		Printed Name	(Req⊔ired)	D	ate	Signature of	of Authorizing Official retary for Administration or Designee
18(b). Modification(s) (if ap	oplicable)						
e.					·		

Appendix 2

Traveler's Name: Suzanne M. Radell Purpose and Justification: To represent the U.S. Government at the ICANN/GAC meetings in Dublin, Ireland Objectives (3-4 Statements) Advance USG positions regarding the IANA transition and related ICANN accountability processes during GAC deliberations, including the retention of Stress Test 18 in the CCWG proposal; and Ensure that U.S. Interests with regard to the protection of IGO names, new gTLD safeguards, geographic names and human rights are effectively represented in GAC deliberations Period of Travel Departure Date Return Date Personal Day(s) Period of Travel Departure Date Return Date Personal Day(s) Interest with regard to the protection of IGO names, new gTLD safeguards, geographic names and human rights are effectively represented in GAC deliberations Outside meeting timerary: 10/14/2015 10/25/2015 Prease indicate Outside meeting timerary: 10/14/2015 10/25/2015 Piease indicate United time to airport Travel time to airport 1 hour 1 Airport wait time 3.5 hours Airport wait time 4.5 hours 1 Flight Time 9 hrs and 40 mins Flight Time 9 hrs 20 mins 1 Travel time to hotel 1 hour 1 1 1 1 <t< th=""><th></th><th>OIA Travel Re</th><th>quest Form</th><th></th></t<>		OIA Travel Re	quest Form	
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Estimated Total Cost: \$ 3371

Name and Date

Signature

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ASHLEY HEINEMAN E ASHLEY HEINEMAN E		DUBLIN IRELAND DUBLIN IRELAND	15-Oct-15 15-Oct-15	26-Oct-15 26-Oct-15	2421 0	0 0	0 2194.8	2421 2194.8
ASHLEY HEINEMAN E		DUBLIN IRELAND	15-Oct-15	26-Oct-15	-2421	0	0	-2421
ASHLEY HEINEMAN E		DUBLIN IRELAND	15-Oct-15	26-Oct-15	600	0	0	600
ASHLEY HEINEMAN E		DUBLIN IRELAND	15-Oct-15	26-Oct-15	-600	Q	0	-600
ASHLEY HEINEMAN E		DUBLIN IRELAND	15-Oct-15	26-Oct-15	0	0	229.7	229.7
ASHLEY HEINEMAN E Total								3450.5
RYAN CARROLL L		DUBLIN IRELAND	14-Oct-15	23-Oct-15	995	0	0	995
RYAN CARROLL L		DUBLIN IRELAND	14-Oct-15	23-Oct-15	-995	0	0	-995
RYAN CARROLL L		DUBLIN IRELAND	14-Oct-15	23-Oct-15	0	0	994.5	994.5
RYAN CARROLL L		DUBLIN IRELAND	14-Oct-15	23-Oct-15	0	0	34.41	34.41
RYAN CARROLL L		DUBLIN IRELAND	14-Oct-15	23-Oct-15	0	0	3.12	3.12
RYAN CARROLL L		DUBLIN IRELAND	14-Oct-15	23-Oct-15	2997	0	0	2997
RYAN CARROLL L		DUBLIN IRELAND	14-Oct-15	23-Oct-15	-2997	0	0	-2997
RYAN CARROLL L		DUBLIN IRELAND	14-Oct-15	23-Oct-15	0	0	2659.8	2659.8
RYAN CARROLL L D		DUBLIN IRELAND	14-Oct-15	23-Oct-15	600	0	0	600
RYAN CARROLL L	Ω	DUBLIN IRELAND	14-Oct-15	23-Oct-15	0	0	203.6	203.6
RYAN CARROLL L		DUBLIN IRELAND	14-Oct-15	23-Oct-15	-600	0	0	-600
RYAN CARROLL L Total								3895.43
FIONA ALEXANDER M		DUBLIN IRELAND	14-Oct-15	21-Oct-15	997.2	0	0	997.2
FIONA ALEXANDER M		DUBLIN IRELAND	14-Oct-15	21-Oct-15	0	0	994.5	994.5
FIONA ALEXANDER M		DUBLIN IRELAND	14-Oct-15	21-0ct-15	-997.2	0	0	-997.2
FIONA ALEXANDER M		DUBLIN IRELAND	14-Oct-15	21-0ct-15	0	0	34.41	34.41
FIONA ALEXANDER M	ā	DUBLIN IRELAND	14-Oct-15	21-0ct-15	0	0	3.12	3.12
FIONA ALEXANDER M		DUBLIN IRELAND	14-Oct-15	21-0ct-15	2295	0	0	2295
FIONA ALEXANDER M	ď	DUBLIN IRELAND	14-Oct-15	21-Oct-15	-2295	0	0	-2295
FIONA ALEXANDER M	Δ	DUBLIN IRELAND	14-Oct-15	21-Oct-15	0	0	1912.44	1912.44
FIONA ALEXANDER M	Δ	DUBLIN IRELAND	14-Oct-15	21-Oct-15	600	0	0	600
FIONA ALEXANDER M		DUBLIN IRELAND	14-Oct-15	21-Oct-15	-600	0	0	-600
FIONA ALEXANDER M		DUBLIN IRELAND	14-0ct-15	21-Oct-15	0	0	191.79	191.79
FIONA ALEXANDER M Total								3136.26
SUZANNE RADELL M		DUBLIN IRELAND	14-0ct-15	25-Oct-15	7188.9	0	0	7188.9

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D00005195	SUZ/
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14-Oct-15 14-Oct-15 14-Oct-15 14-Oct-15 14-Oct-15 14-Oct-15 l4-0ct-15 14-Oct-15 14-Oct-15 14-Oct-15 DUBLIN IRELAND DUBLIN IRELAND DUBLIN IRELAND **DUBLIN IRELAND** DUBLIN IRELAND DUBLIN IRELAND DUBLIN IRELAND DUBLIN IRELAND DUBLIN IRELAND DUBLIN IRELAND

-7188.9 370.63 7178.8 -500 21.89 2976.35 500 10582.08 34.41 2871 -2871 7178.8 0 21.89 0 0 370.63 34.41 0 0 2976.35 00 0 0 0 0 0 0 0 0 -7188.9 -500 500 0 0 0 0 2871 0 -2871 25-Oct-15 25-Oct-15 25-Oct-15 25-Oct-15 25-Oct-15 25-Oct-15 25-Oct-15 25-Oct-15 25-Oct-15 25-Oct-15

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Order Nu	Travel Order Nun Traveler/Vendor Name	Destination	Begin Date End Date Doc No	End Date		Undelivere Unpaid Acc Paid Accrui Total	aid Acc P	aid Accrui T	otal
D00005187	LAWRENCE STRICKLING E	DUBLIN IRELAND	14-Oct-15	14-Oct-15 26-Oct-15	346375	1320	0	0	1320
D00005187	LAWRENCE STRICKLING E	DUBLIN IRELAND	14-Oct-15	26-Oct-15	1329608	0	0	1180.95	1180.95
D00005187	LAWRENCE STRICKLING E	DUBLIN IRELAND	14-Oct-15	26-Oct-15	1329608	-1320	0	0	-1320
D00005187	LAWRENCE STRICKLING E	DUBLIN IRELAND	14-Oct-15	26-Oct-15	1329608	0	0	3.58	3.58
D00005187RT	LAWRENCE STRICKLING E	DUBLIN IRELAND	14-Oct-15	26-Oct-15	346376	4011.75	0	0	4011.75
D00005187RT	LAWRENCE STRICKLING E	DUBLIN IRELAND	14-Oct-15	26-Oct-15	1319003	-4011.75	0	0	-4011.75
D00005187RT	LAWRENCE STRICKLING E	DUBLIN IRELAND	14-Oct-15	26-Oct-15	1319003	0	0	3144.75	3144.75
D00005187RT	LAWRENCE STRICKLING E	DUBLIN IRELAND	14-Oct-15	26-Oct-15	346376	500	0	0	500
D00005187RT	LAWRENCE STRICKLING E	DUBLIN IRELAND	14-Oct-15	26-0ct-15	1319003	-500	0	0	-500
D00005187RT	LAWRENCE STRICKLING E	DUBLIN IRELAND	14-0ct-15	26-Oct-15	1319003	0	0	179.5	179.5
									4508.78