

**DECISION**

**THE COMPTROLLER GENERAL  
OF THE UNITED STATES**  
WASHINGTON, D. C. 20548

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**FILE:** B-212559**DATE:** February 24, 1984**MATTER OF:** Abraham Frydman - Bonus Travel Coupon**DIGEST:**

1. A bonus ticket received by an employee as a result of trips paid by both appropriated funds while on official travel and personal funds, is the property of the Government and should be turned into the appropriate officials of the Government.
2. An employee who enters a promotional program and receives a nontransferable free upgrade to first-class service may use such benefits since the Government has no use for such benefits.

This decision responds to a request by Mr. Ludlow C. Martin, Acting Chief Counsel, U.S. Army Electronics Research and Development Command, concerning several issues which arose as a result of bonus coupons earned by Mr. Abraham Frydman while on official business. By decisions of today, B-210717 and B-212236, we have addressed the issues raised by Mr. Martin. However, we will briefly raise and answer all questions raised in Mr. Martin's request.

The first question raised is who owns a bonus airline ticket when a Government employee, who has enrolled in an airline mileage accumulation program, earns a bonus airline coupon based on both Government and personal travel mileage.

As discussed in B-210717 and B-212236, if Government funds are used by an employee on official business and the employee receives a bonus coupon as a result of Government travel and privately financed travel, the bonus ticket or other promotional gift is the property of the Government. See also 41 C.F.R. Part 101.25, as amended, 48 Fed. Reg. 48,231, October 18, 1983.

The second question involves the same situation but asks whether the Government employee should be allowed to use the bonus ticket for personal travel and reimburse the

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Government for that part of the bonus ticket earned as a result of Government travel. On the other hand, should the employee be requested to use the ticket only for Government travel but be reimbursed for the part of the bonus ticket earned as a result of personally financed travel?

The answer to this question, as stated above, is that the employee has an obligation to turn in the ticket to the appropriate agency official. If the bonus ticket can be used for Government travel by either that employee or another employee (if the ticket is transferable), then the agency official involved should use the ticket in that manner. As we stated in B-210717, an employee must not mix Government travel and personal travel under the bonus programs. If the employee wishes to keep the bonus gifts or incentives under such a program, all mileage or trips must be paid from personal funds.

The third question raised is whether an employee who has received a nontransferable, first-class bonus airline ticket, may travel first class while on Government travel, regardless of the availability of coach seats.

In B-210717, dated today, we considered the question of whether employees could use nontransferable services such as free upgrade to first class. We held that the employee may use such benefits since they have no value to the Government.

*Milton J. Fowler*

Acting Comptroller General  
of the United States