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

RELEASED

**B-186499** 

April 7, 1978

Mr. Robert P. Graham, Commissioner Federal Supply Service General Services Administration Washington, D.C. 20406

Dear Mr. Graham:

This is in response to your letter of August 17, 1977, requesting our views and comments on proposed changes to the Federal Travel Regulations and a proposed amendment to 5 U.S.C. 5724(b) to more fully reimburse Federal employees who own and transport a mobile home in connection with a permanent change of duty station.

We fully support the proposed legislative change to 5 U.S.C. 5724(b). As we stated in our letter of July 27, 1977, to the Administrator, General Services Administration:

"For some time we have been aware of the apparent inequities with regard to allowable reimbursable expenses incident to a permanent change of duty station for those Federal employees who own and transport a mobile home, as compared to those employees who move from one house to another. The expenses incurred by employees moving mobile homes far exceed their allowable expenses, although the expenses incurred are generally small in comparision to those of employees who buy and sell houses. In spite of the fact that the former employees are theoretically entitled to expenses not to exceed those granted under 5 U.S.C. 5724(a), the direct cost of transportation of a mobile home never approaches that limitation. The employee must then rely on his miscellaneous expense allowance to cover all costs other than the direct cost of transporting the mobile home. These costs include preparing his mobile home for transportation and setting it up upon arrival. These costs are often quite extensive, especially if the employee has, inter alia, an awning, an extra room, a storage shed, air conditioning, or a double-wide home. These costs far exceed the direct cost of transporting the mobile home and are not now fully covered by the miscellaneous expense allowance."

We believe the proposed amendment will permit reimbursement of the types of expenses mentioned above which currently are payable only to the extent possible under the employee's miscellaneous expense allowance.

With regard to the legality of possible interim changes to the Federal Travel Regulations, we have examined the legislative history of Public Law 87-776, approved October 9, 1962. That law first authorized the commercial transportation of mobile homes and is nearly identical to the present statutory authority found at 5 U.S.C. 5724(b). Senate Committee Report No. 2185, 87th Cong., September 28, 1962, shows that "commercial transportation" was authorized because mobile homes were becoming too large to be moved by an employee and because the 20-cents per mile allowance did not cover the cost of reimbursing a commercial mover. The Committee noted that the cost of moving a mobile home varied between 29 cents and 85 cents per mile. This cost was derived from a number of factors and included costs other than the direct cost of transportation itself. In other words it was the total cost ultimately charged to the owner of a mobile home by the mover divided by the number of miles moved. The Committee expressed its concern over the escalating costs of transporting a mobile home, not by limiting the expenses covered, but by limiting reimbursement to the cost of moving household goods.

Accordingly, we believe that it would be both permissible and desirable to amend the Federal Travel Regulations to allow reimbursement of costs of preparing mobile homes for movement, maintenance and repairs (if required en route), storage, and charges by movers designated in the tariffs as "special services."

Sincerely yours,

Acting

Comptroller General

of the United States

cc: Mr. James T. McIntyre, Jr. Director, OMB