



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

B-178310

June 6, 1973

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Mr. R. J. Schullery
Authorized Certifying Officer
Federal Aviation Administration
Department of Transportation

Dear Mr. Schullery:

This refers to your letter of March 27, 1973, requesting our opinion as to whether a voucher presented by Mr. Terry D. Grefe, an employee of your agency, was properly certified for payment. The voucher [claimed for] reimbursement for expenses incurred incident to performance of temporary duty at Leesburg, Virginia, during the period December 1-31, 1972. The expenses in question are stated on the voucher as follows:

LODGING

Motor Home Rental, Grefe and Williamson Inc.
Main Street, Fairfax, Virginia
31 days at 12.25/day. Per Diem claimed
31 days at \$25/day

Your letter states that:

Mr. Grefe was paid per diem at the rate of \$25.00 for the month of December 1972 (less one day annual leave) while on official business away from his headquarters in New York. The rate of per diem paid was computed on the basis of lodging costs plus \$12.00 rounded off to the nearest dollar. This method of fixing per diem complies with the provisions of Section 6.3c, Office of Management and Budget Circular A-7.

A review of the paid claim reveals that the lodging costs incurred by Mr. Grefe was the rental charge for a motorized mobile home which he rented from a firm which included his father as one of the members of the firm. The question arises as to whether it is permissible under the provisions of Section 6.3c OMB Circular A-7 to treat rental charges for a motorized mobile home in their entirety as lodging costs. It would seem reasonable that a part of the rental charge of \$12.25 per day charged Mr. Grefe for the motorized home, included charges for the rental of the motorized portion of

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the vehicle. We are uncertain as to whether the rental charge should be reduced to reflect the true cost of lodging and, if so, on what basis should the reduction be made?

Subsection 6.6b of Office of Management and Budget (OMB) Circular No. A-7, Standardized Government Travel Regulations (SGTR) provides as follows:

b. Use of travel trailer or camping vehicle. Per diem may be allowed when the traveler uses a travel trailer or camping vehicle while on temporary assignment away from his official station.

Your letter advises that implementing regulations of the Federal Aviation Administration (FAA) provide that:

* * * when a mobile dwelling is used as a temporary residence during the period of TDY, the expenses to be used in determining the "cost of lodging" shall be those expenses incurred for: rental of the dwelling and/or the space occupied by the dwelling; utilities such as electricity, water, sewage and fuel. In situations where the mobile dwelling is leased or rented, the lodging cost shall be limited to the rent paid for the dwelling, the space it occupies and utilities, if paid separate from the rent, on a pro rata basis for the period of TDY. The expenses referred to must be itemized on the travel voucher.

As you have pointed out the FAA regulations do not differentiate between mobile dwellings capable of being towed or self-propelled.

In 50 Comp. Gen. 647 (1971) we held that a "truck-campor, while not a trailer, is a temporary living unit and as such may be viewed as within the regulations for purposes of per diem allowances." A motor home such as here involved is likewise a temporary living unit.

It is our view that rent for the use of a motor home is a proper element of lodging costs the same as rent for a mobile home, trailer, or truck-campor. An allocation of rental costs on a functional basis is not required.

As to the particular facts in the instant case, and in view of the interest of the father of the claimant in the firm from which the motor home

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was rented, it is suggested that the employee be requested to submit a statement of the circumstances of rental to support the disbursement and also include with such statement information in regard to rental of space, cost of utilities, etc., during the period of temporary duty. See section 3.2d of SGTR.

In general, with respect to the application of subsection 6.3c to reimbursement for use of mobile dwellings owned by employees we have suggested that an agency may make a determination that the "lodgings-plus" formula is not appropriate and fix specific per diem rates for employees using their own equipment. See our letter B-175322, April 28, 1972, copy enclosed. In this connection we note the Department of Defense has made such a determination. See C 8101-2k, Joint Travel Regulations, Volume 2.

Sincerely yours,

PAUL G. DEMBLING

For the Comptroller General
of the United States