

REPORT BY THE U.S.

General Accounting Office

Uncertain Benefits From Expanded Rotation System For Customs Inspectors At Buffalo/Niagara Falls

Rotation of Customs inspectors is a long-standing practice accepted by inspectors. However, the expansion of the rotation system at Buffalo/Niagara Falls from an intra to an intercity system has been marked by controversy.

The controversy exists because the benefits to be derived from the new system are intangible and uncertain whereas the added costs to inspectors--mostly travel related--are certain. Under these circumstances, the soundness of regional management's decision to continue with the expanded rotation system cannot be measured objectively.



119794



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UNITED STATES GENERAL ACCOUNTING OFFICE
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GENERAL GOVERNMENT
DIVISION

B-208900

The Honorable Geraldine A. Ferraro
Chairwoman, Subcommittee on Human Resources
Committee on Post Office and Civil Service
House of Representatives

Dear Madam Chairwoman:

In mid-1981, the Commissioner of Customs Region I, Boston, proposed an expanded rotation system for inspectors at the U.S. Customs Service Port of Buffalo/Niagara Falls, New York. On June 13, 1982, the new system went into effect. Under the old system, Customs inspectors were rotated among inspection sites in either Buffalo or Niagara Falls but were not rotated between the two cities. Under the new system, however, inspectors are rotated among inspection sites with no distinction made between the two cities. This report is in response to your May 28, 1982, request that we (1) determine whether the announced goals of the new system--enhanced inspector integrity and proficiency--are valid and will be achieved and (2) evaluate the effect of the system on employee morale. (See app. I.)

Rotation is a longstanding Customs practice accepted by the inspectors. At issue in the Buffalo/Niagara Falls Port is not rotation per se but its extent. Achievement of the goals of the expanded rotation plan is, at best, uncertain.

Customs' regional management told us that the contribution, actual or expected, of the rotation plan to prevent inspector integrity problems from occurring and enhance inspector proficiency is unmeasurable. Regional management officials said the plan was instituted because they felt it would enhance inspection integrity and proficiency. Hence, while the goals are laudable, they are intangible and cannot be measured objectively.

Discussions with the workforce and front line supervisors disclosed that the inspection functions at both cities are similar. Therefore, rotation among the various sites offers little opportunity for inspectors to become more proficient. Furthermore, both the Regional Commissioner and the District Director told us that workforce integrity has not

been a problem. Regional and district management told us the plan is a way to prevent problems involving integrity from occurring.

In contrast to the intangible and uncertain benefits to be obtained from the rotation plan is the certainty of its cost to the workforce. Inspectors now incur higher commuting costs because they must travel longer distances to and from worksites. And, according to inspectors, their morale has deteriorated. In their view, the integrity issue has been raised without sufficient reason and they have been forced to incur higher commuting costs without being convinced of the benefits of the new system. Under these circumstances, management's decision to continue with the expanded rotation system cannot be measured objectively.

A February 1982 report by Customs' Office of Management Integrity challenged the effectiveness of the then proposed rotation plan and recommended that the Regional Commissioner (Customs Region I, Boston) reevaluate the plan. The Regional Commissioner did not adopt the recommendation. Subsequently, the Office of Management Integrity held that the rotation of inspectors is within the prerogative of regional management and withdrew its recommendation.

The remainder of the report discusses the plan and its ramifications in greater detail.

INSPECTION AND ROTATION IN THE PORT OF BUFFALO/NIAGARA FALLS

The Port of Buffalo/Niagara Falls is one of five ports in the Buffalo District of Customs Region I (Boston). The Port handles both cargo and passenger traffic entering mainly from Canada via air, sea, land, and rail. Major entry points include three bridges in Niagara Falls and one in Buffalo, and the Buffalo International Airport. There is also a small amount of shipping in Buffalo.

During the period August 1981 to July 1982, the port handled about 652,000 cargo entries; 16.8 million travelers; and about 7 million vehicles. An estimated \$168 million in duties was collected. As of July 1982, 109 GS-9 inspectors and 27 GS-11 and GS-12 supervisory inspectors were assigned to the Port's 12 inspection stations.

Under the prior inspection organization, the inspectors were about evenly divided between the Buffalo branch and the

Niagara Falls branch, which are about 24 miles apart. Inspectors rotated assignments every 2 weeks to other inspection sites within their assigned branch. In accordance with Customs' agreement with the National Treasury Employees Union (NTEU), inspectors were allowed to exchange or swap work assignments (shifts and/or sites) with management approval.

In the summer of 1981, the Regional Commissioner proposed a reorganization of the Port under which the Buffalo branch and the Niagara Falls branch were to be eliminated as separate organizational entities. Inspectors would be required to rotate assignments Port-wide.

The Port-wide rotation system went into effect June 13, 1982, following a series of postponements due to management-union differences submitted to arbitration panels. Under the expanded rotation system, the GS-9 inspectors are required to rotate to other inspection sites every 2 weeks. Since October 1981, supervisory inspectors (GS-11 and 12 inspectors) have been generally assigned to a site for a year. Inspectors maintain their right to swap work assignments; however, they must become proficient at an assigned work site before doing so.

BENEFITS OF THE NEW SYSTEM
ARE SUBJECTIVE

Rotation of inspectors is a management prerogative in Customs. Customs headquarters officials told us that, for the most part, regional management has wide latitude in determining the nature and extent of rotation needed to meet the inspectional procedures of their respective geographic areas. However, there is no Customs-wide policy on the relationship of rotation to inspector integrity and proficiency. Customs' general policy states only that

- inspectors shall not remain at one place of assignment, for example, pier or airport, for more than 1 year and
- where different tours of duty have been established at a place or assignment, inspectors shall be rotated to different tours at least every 4 weeks.

The Regional Commissioner, Region I, told us that the major purposes of the expanded rotation system are to (1) strengthen employee integrity and (2) increase inspectors' expertise by ensuring they are able to perform the full range

of duties in the Port. The system is also expected to provide increased flexibility for management in assigning work and in equalizing overtime. (Inspectors in the Buffalo branch had been earning considerably more overtime pay than their counterparts in Niagara Falls.) The Regional Commissioner stated that he does not expect to realize any cost savings from the new system.

Regional management, however, told us there is no means of empirically measuring the contribution of the new rotation system to achieving its major goals--preventing inspector integrity problems from occurring and enhancing inspector proficiency. Buffalo District officials discussed and informally documented several alternative means of implementing port-wide rotation, considering the advantages and disadvantages of each. These alternatives, however, assumed there would be expanded rotation and were concerned only with the best way to put the system into operation. Hence, measuring the rotation system's impact will be subjective.

Inspector integrity

The Regional Commissioner told us that expanded rotation is necessary to prevent problems of integrity in the inspection system. His concern has been heightened by recent events in Customs Region II (the New York City area) where a number of employees were involved in corrupt practices.

Whether the Regional Commissioner's concern is an adequate basis for expanding rotation is uncertain. None of the regional or district officials we spoke to, including the Regional Commissioner, indicated that integrity problems exist in the Port of Buffalo/Niagara Falls. Moreover, the action being taken in Buffalo/Niagara Falls does not appear to be related to the corruption activity in the New York Region.

During 1980 and 1981, according to New York regional representatives, 7 inspectors and 38 other Customs employees in Region II were charged with various offenses including acceptance of gratuities, theft of tax duties, theft of bonded merchandise, obstruction of justice, and conspiracy. Most of the offenses occurred at bonded warehouses in the Newark, New Jersey District where employees ranging from guards to senior management officials either accepted or stole bonded merchandise. We were told that 42 convictions have been obtained. In addition, one employee resigned in lieu of prosecution, one employee's case is awaiting a sentencing decision, and one employee received a letter of reprimand.

Because the vast majority of employees involved in the corrupt practices were not inspectors, the rotation of inspectors is not apt to preclude the kinds of problems that occurred in New York from occurring at Buffalo/Niagara Falls. Also, although Region II (New York) policy requires annual rotation of inspectors, representatives of the region's office of internal affairs told us that three of the inspectors had not worked in the district long enough to be subject to the rotation policy and three were not rotated as prescribed. One of these had not been rotated for more than 2 years. However, these practices definitely contrast to the ones being followed in Buffalo/Niagara Falls. There, inspectors in both branches had been rotating intrabranch assignments every 2 weeks prior to June 13, 1982.

Inspector proficiency

The Regional Commissioner told us that expanded rotation will increase the expertise and promotability of inspectors by ensuring that they are able to perform the full range of inspection duties in the Port, thereby helping to accomplish the Customs mission more effectively. He indicated that some inspection functions are unique to either Buffalo or Niagara Falls. Thus, under the prior system, inspectors assigned to one branch ordinarily did not receive the opportunity to periodically perform functions unique to the other branch. On the other hand, we found that these activities are not very dissimilar and, therefore, present little opportunity for inspectors to become more proficient.

Functions claimed by regional management to be unique to Niagara Falls involve clearing (1) large-volume passenger charter aircraft, (2) military aircraft, and (3) ferry vessels and passengers. We found that these inspection activities either do not occur frequently, are not unique, or are no longer required. From August 1981 through July 1982, Niagara Falls cleared only 11 large-volume passenger charter aircraft. During the same period, Niagara Falls cleared 44 military/other government aircraft, while Buffalo cleared 19. Furthermore, the passenger ferry has not operated since September 1981.

Functions claimed by regional management to be unique to Buffalo include (1) clearing commercial vessels, (2) examining air cargo shipments, (3) clearing precleared flights from Canada, and (4) examining merchandise forwarded in-bond from other Customs ports.

Clearing commercial vessels does not appear to us to be either a frequent occurrence or one which would meaningfully enhance an inspector's proficiency. From October 1981 through July 1982, Buffalo cleared 79 commercial vessels. Of these, 75 were bulk cargo ships that make routine deliveries of cement, iron ore, and petroleum. The nature of the cargo and the consistency of documentation renders the clearance of these vessels slightly more than a formality. Further, because this type of traffic is relatively light, the only opportunity to develop expertise is to be assigned the position of marine inspector. But because assignments to this position change only once a year, most inspectors will not have that opportunity.

Inspectors said that prior to expanded rotation, Niagara Falls inspectors on overtime assignments in the Buffalo area cleared commercial vessels with the same proficiency as Buffalo inspectors. During our fieldwork, a Niagara Falls inspector, without prior experience, cleared a commercial vessel at Buffalo. The marine inspector reviewed the entry documentation and informed us that it was complete and accurate.

The three other inspection functions unique to Buffalo occur frequently and do not occur in Niagara Falls. From August 1981 through July 1982, Buffalo cleared about 59,000 air cargo shipments and about 18,000 entries of in-bond merchandise. It also processed about 3,700 precleared flights.

However, the difference in inspection functions required for these types of workload is apparently not that substantial. Inspectors in both branches handled a substantial workload in each of the three major inspection categories: passengers, cargo, and vehicles. Inspectors throughout Customs follow uniform inspection procedures applicable to each category. Accordingly, inspection of a passenger or an item of cargo is basically the same regardless of the method of conveyance by which the passenger or cargo arrives. The Buffalo district director for inspection and control told us there are only minor differences in inspecting the different types of workload.

Finally, despite the alleged uniqueness of these inspection functions at each branch, it appears to us to be relatively easy for an inspector to become proficient. Buffalo District guidelines indicate that by working 9 days at a particular inspection site, an inspector can become proficient at that site.

EXPANDED ROTATION ADVERSELY
AFFECTS INSPECTORS

Overall, the morale of inspectors has been adversely affected by the manner in which the new rotation system was introduced and implemented and by the additional costs and hardships most inspectors will experience in traveling to more distant work sites.

Prior to implementation, district management did not formally explain to or discuss with inspectors the significant change in long-standing rotation practices resulting from the new system and the reasons for it. District management officials told us that their rotation plans were discussed with the NTEU and therefore there was no need to explain the plan to individual inspectors. Additionally, the Regional Commissioner used the issue of integrity as one of the prime justifications for expanded rotation. Inspectors told us they took this as an affront to their personal honesty.

The inspectors we contacted generally told us that when first employed in the Port, they were made aware that there were work sites in both Buffalo and Niagara Falls. However, they were told that they would be assigned to either Buffalo or Niagara Falls, and would rotate to work sites only within the branch to which they were assigned. Accordingly, many established homes near where they expected to be working. Expanded rotation will require them to incur unexpected additional travel.

Appendix III presents the results of a questionnaire sent to 109 non-supervisory inspectors in the Port to ascertain the additional distances and time each would have to travel on a daily basis and the associated costs of travel when assigned to work sites in the other city. About two-thirds of the inspectors (72) responded. As shown in appendix III, most inspectors (52), at times will have to travel distances greater than they did under the previous rotation system. On the other hand, some inspectors (20)--particularly those previously assigned to Niagara Falls--will at times incur less travel as a result of expanded rotation.

While most inspectors will experience increased travel, the full impact is not known. It is difficult to calculate the additional time, distance, and costs involved on a long-term basis because the rotation schedule is subject to change due to leave, unforeseen inspection requirements, and other factors. Also, inspectors will only incur additional costs

and hardships when they are assigned to work sites in the other city. Without swapping assignments, this will occur about 50 percent of the time. The data is based on inspectors' estimates and time constraints did not permit us to verify it.

Inspectors claim that the longer workdays occasioned by increased travel to and from work will disrupt family life; make it more difficult to react to a family emergency; expose them to increased driving hazards due to inclement weather; prevent or disrupt schooling; and cause other related hardships involving health and family. Inspectors also claim that, aside from increased travel costs, they will incur other costs attributable to lengthier commuting. These include increased costs of auto insurance, increased wear and tear on cars, and the possible need to purchase another car. Some also stated that they will incur additional costs for child care; others cited the need to use more leave to meet family and other obligations.

On the positive side, several inspectors formerly assigned to Niagara Falls liked the prospect of earning more overtime pay as a result of rotation to Buffalo inspection sites where overtime is more frequent.

SIMILAR CUSTOMS PORTS HAVE LESS ROTATION

The expanded rotation policy being followed in the Port of Buffalo/Niagara Falls differs from rotation practices in several Customs ports that have work sites with similar geographic characteristics. The significance of the differences, however, is uncertain. But apparently the inspectors' quality of life has some impact on the rotation practices. On the other hand, inspectors assigned to the primary inspection lanes at the border checkpoints are subject to rotation to a different lane every 20 to 30 minutes.

The following information should not be construed as a completely accurate comparison of rotation practices in geographically similar ports. Customs representatives agreed, however, that the three major ports discussed below--Los Angeles, San Diego, and San Francisco--have work sites geographically similar to the Port of Buffalo/Niagara Falls.

The Port of Los Angeles is comprised of two major areas--the harbor area (96 inspectors assigned) and Los Angeles Airport (173 inspectors)--located about 27 miles apart.

As noted above, the Buffalo/Niagara Falls branches are about 24 miles apart. Inspectors are rotated among various shifts and work sites within each area. They are not rotated between areas. For example, most of the harbor area inspectors are assigned to work sites at docks in the Los Angeles/Long Beach harbor. They are rotated annually among these work sites which are all located within a few miles of each other. They do not, however, rotate to the airport.

A Port representative told us that rotation between the airport and harbor was tried some years ago but was unsuccessful because (1) travel time for inspectors was burdensome and (2) the rotation period was 30 days--just long enough for an inspector to become fully effective at one location before being rotated to the other location.

We were also told that the basic reason for rotation is to maintain inspector integrity. The current rotation policy is considered to be adequate for integrity purposes even though the rotation period is relatively lengthy (1 year) and rotation is only from dock to dock. A Port representative said that expanded rotation between the harbor and the airport would negatively affect morale and quality of work and create problems with the union.

Similar rotation practices are followed in the Port of San Diego, where the two major work locations--San Ysidro and San Diego--are located about 18 miles apart. Los Angeles regional officials said that a limited rotation policy is desirable in terms of the quality of life of inspectors as well as the development of specialized skills.

The Port of San Francisco has three major areas--Oakland-East Bay, 54 inspectors; San Francisco-West Bay, 45 inspectors; and San Francisco Airport, 27 inspectors.

New inspectors are rotated among work sites, regardless of area, every 3 months during their first year. Subsequently, every inspector must serve 1 year at the airport. Thereafter, inspectors are rotated on an annual basis to a work site within Oakland or San Francisco. Also on an annual basis, inspectors are asked which locations they prefer and preferences are honored to the extent workload permits. If necessary to honor a preference, an inspector who has been at the requested location for the longest time will be rotated to another assignment. The San Francisco district policy is to assign inspectors to areas near where they live to help morale. Apparently, this policy is being implemented successfully. District officials told us there are only about 10 swaps each year.

According to the district director for inspection and control, inspectors are rotated for purposes of integrity and training. In some instances, rotation is used to improve the performance of an inspector who is not performing adequately at a particular location. With respect to integrity, the director said that after a few years, an inspector becomes well acquainted with importers and other inspectors, so that even expanded rotation would not enhance integrity.

SWAPPING MAY AFFECT THE
IMPACT OF EXPANDED ROTATION

The ability of inspectors to swap work assignments may lessen their hardships under the new rotation system as well as reduce the expected benefits of the system.

Under the agreement between Customs and the NTEU, inspectors have the right to swap work assignments. At the Port of Buffalo/Niagara Falls inspectors are eligible to swap a work site once they have acquired site proficiency at that site. According to district guidelines, site proficiency is acquired by working 9 days at the site. Also, an inspector is assumed to have proficiency at work stations in the branch to which previously assigned. Fifty-eight of the inspectors responding to our questionnaire said they intend to take advantage of swapping. As of August 31, 1982, 10 inspectors had gained site proficiency and had interbranch swaps approved.

Obviously, if inspectors wind up where they started from, the perceived benefits of the new rotation system will be lessened. Correspondingly, the inspectors' travel related hardships will also be lessened.

On the other hand, several factors could diminish the opportunity for swapping. First, it will take some time before every inspector has achieved site proficiency at each work site, and then the opportunity to swap may be limited by inspector scheduling problems. Also, regional Customs representatives told us that in order to maintain the intent of expanded rotation, the region will probably take the position that site proficiency is lost within a year. This position would require inspectors to undergo a reorientation at each work site annually in order to renew site proficiency. Customs regional representatives said the matter was under negotiation with the NTEU and they do not expect the negotiations to be completed until January 1983.

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At your request we did not take the additional time needed to obtain formal agency comments from the Department of the Treasury. As noted in our Objectives, Scope, and Methodology section (see app. II) we discussed the matter with appropriate Customs representatives. Customs regional management was provided a written statement of facts and regional officials' comments were considered in preparing the report.

As arranged with your office, we plan no further distribution of this report until 30 days from its issue date, unless you publicly announce its contents earlier. At that time we will send copies to the Secretary of the Treasury and other interested parties. Copies will be made available to others upon request.

Sincerely yours,



William J. Anderson
Director

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TELEPHONE (202) 225-2821

May 28, 1982

The Honorable Charles A. Bowsher
Comptroller General of the United States
General Accounting Office
441 G Street, N.W.
Washington, D.C. 20548

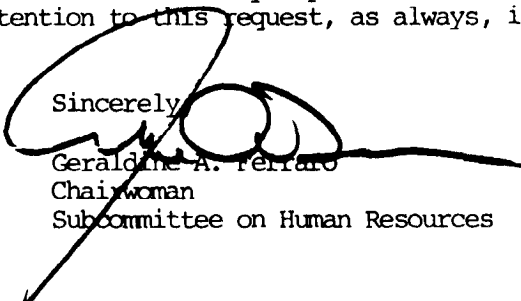
Dear Mr. Bowsher:

I am writing to request a review of the personnel rotation plan soon to be implemented by the Northeast Region of the U.S. Customs Service. Specifically, I am concerned that the morale of the workforce may be adversely affected if the plan is implemented.

Enclosed is a copy of correspondence which I received on this issue from the Customs Service. As you will note, the plan is justified on the basis of proficiency and integrity in the workforce. I would like you to review this situation to determine whether the plan will achieve the desired results, the validity of those goals, and the effect the plan would have on the morale of the workforce.

I have requested that the Customs Service delay implementation of the plan pending your review. Your attention to this request, as always, is sincerely appreciated.

Sincerely,



Geraldine A. Ferraro
Chairwoman
Subcommittee on Human Resources

GAF/tp
Enclosure

OBJECTIVES, SCOPE, AND METHODOLOGY

Our review was aimed at evaluating the validity of the goals for the expanded rotation system for inspectors at the Customs Service Port of Buffalo/Niagara Falls, New York, and the effect of the system on the inspection workforce.

We discussed the matter with officials and inspectors and reviewed records at Customs Region I (Boston); the Buffalo District; and the Port of Buffalo/Niagara Falls. We interviewed local representatives of the National Treasury Employees Union and responsible officials and personnel at Customs headquarters. We also discussed inspector rotation practices with Customs officials in Regions II (New York), VII (Los Angeles), and VIII (San Francisco), ¹/_{and the districts of Los Angeles and San Francisco.}

We also sent non-supervisory inspectors (109) in the Buffalo/Niagara Falls Port a questionnaire aimed primarily at obtaining data on additional travel they expect to experience under the new rotation system. We received responses from 75 (68 percent) of the inspectors queried; three responses were incomplete.

This review was conducted in accordance with generally accepted Government auditing standards.

¹/_{The San Francisco region was merged with the Los Angeles region effective October 1, 1982.}

SCHEDULE OF DAILY ADDITIONAL ROUND TRIP
DISTANCE, DRIVING TIME, AND COST RESULTING
FROM EXPANDED ROTATION OF INSPECTORS
AUGUST 1982 (note a)

Inspectors Previously Assigned to Buffalo Branch

<u>Inspector</u>	<u>Additional distance</u>		<u>Additional driving time</u>		<u>Additional cost (note b)</u>	
	<u>Best case</u> (miles)	<u>Worst case</u>	<u>Best case</u> (minutes)	<u>Worst case</u>	<u>Best case</u>	<u>Worst case</u>
1	8	39	20	70	\$ 2.98	\$11.82
2	40	49	65	65	12.40	14.97
3	1	45	40	90	.59	13.13
4	50	64	60	70	14.70	18.94
5	38	54	70	90	12.03	16.59
6	42	50	75	95	13.17	15.45
7	26	48	20	35	8.21	14.48
8	30	46	0	40	9.75	14.31
9	32	47	40	80	9.32	14.60
10	24	45	20	50	8.04	14.03
11	11	15	30	40	3.84	4.98
12	38	50	90	90	12.03	15.95
13	42	52	65	80	13.17	16.02
14	17	48	23	67	5.25	14.38
15	8	20	16	30	2.98	6.40
16	32	56	30	70	9.82	16.66
17	40	54	64	82	12.60	17.09
18	22	42	45	60	7.47	13.17
19	16	54	10	110	5.26	16.09
20	37	48	45	50	11.30	14.43
21	32	46	40	45	10.32	14.31
22	(17)	(1)	(20)	(5)	(5.35)	(.79)
23	32	40	20	30	10.32	12.60
24	39	47	50	70	12.32	14.60
25	24	46	25	75	8.04	14.31
26	35	49	50	80	10.48	14.47
27	36	52	65	80	11.46	16.02
28	24	40	35	40	7.54	12.10
29	32	49	20	55	10.32	15.17
30	20	30	40	55	6.40	9.25
31	0	0	0	0	0	0
32	40	50	45	70	12.60	15.45
33	18	40	30	50	5.33	12.10
34	36	55	45	65	11.46	16.88
35	0	37	0	72	.10	10.90
36	26	50	36	70	.70	8.11

SCHEDULE OF DAILY ADDITIONAL ROUND TRIP
DISTANCE, DRIVING TIME, AND COST RESULTING
FROM EXPANDED ROTATION OF INSPECTORS
AUGUST 1982 (note a)

Inspectors Previously Assigned to Niagara Falls Branch

<u>Inspector</u>	<u>Additional distance</u>		<u>Additional driving time</u>		<u>Additional cost (note b)</u>	
	<u>Best case</u> (miles)	<u>Worst case</u>	<u>Best case</u> (minutes)	<u>Worst case</u>	<u>Best case</u>	<u>Worst case</u>
1	(41)	(16)	(30)	(20)	\$(12.49)	\$(5.36)
2	(24)	(8)	(5)	0	(7.03)	(2.59)
3	39	48	36	60	12.32	14.38
4	(30)	(8)	(40)	0	(9.25)	(2.98)
5	(34)	(4)	(60)	0	(9.69)	(.64)
6	(4)	26	0	30	(1.14)	7.41
7	25	45	30	70	8.33	14.03
8	23	48	20	60	7.35	14.08
9	0	18	20	50	0	5.63
10	2	15	0	36	.57	4.28
11	1	10	0	0	.29	2.85
12	6	20	20	50	1.71	6.20
13	(20)	(4)	(30)	(10)	(5.70)	(.64)
14	(46)	(10)	(76)	0	(13.81)	(3.55)
15	(26)	(14)	(20)	(18)	(7.76)	(3.64)
16	(1)	22	(10)	45	.21	6.77
17	(8)	12	(5)	25	(2.28)	3.42
18	34	69	45	80	10.89	20.37
19	2	44	50	70	.57	13.04
20	22	34	50	48	6.97	10.89
21	(5)	39	10	50	(1.43)	11.12
22	(2)	22	5	10	(.57)	6.27
23	12	42	Not reported		3.42	13.17
24	34	65	70	90	10.89	19.73
25	(24)	(4)	(35)	(10)	(7.09)	(1.39)
26	(18)	(8)	(30)	0	(.57)	(2.28)
27	26	60	40	80	8.17	17.80
28	1	7	15	20	.29	2.00
29	(52)	(4)	(65)	(5)	(15.08)	(1.40)
30	(32)	(24)	(45)	(35)	(9.38)	(7.10)
31	(9)	0	(5)	(5)	(2.57)	.50
32	(26)	(12)	(30)	(5)	(7.61)	(3.62)
33	(1)	6	3	0	.29	1.71
34	2	10	0	0	.57	2.85
35	24	46	25	70	8.04	14.31
36	22	52	55	80	6.27	16.02

a/"Best case - worst case" indicates the minimum and maximum distances an inspector would have to travel from his/her home to an inspection station where he/she had not previously worked. For example, for an inspector previously assigned to the Buffalo Branch, the worst case would represent the distance from his/her residence to the farthest Niagara Falls work station minus the distance from his/her residence to the nearest Buffalo work station. The best case would be the distance from his/her residence to the nearest Niagara Falls work station minus the distance from his/her residence to the farthest Buffalo work station. The two figures represent the extremes of additional travel each inspector would experience. The additional distance applicable to other work stations would lie in between the best and worst cases.

b/Cost computed at 28.5¢ per mile plus tolls. Mileage rate established by the American Automobile Association for intermediate size, 6-cylinder car driven 15,000 miles annually.

(263940)



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