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**DISTRICT'S DEPARTMENT OF PUBLIC WORKS
IMPROPERLY COLLECTED AND RETAINED
MILLIONS IN PARKING TICKET OVERPAYMENTS**

March 19, 1998

EXECUTIVE SUMMARY

PURPOSE

The purpose of this audit was to evaluate the Department of Public Works' (DPW) policy and process for handling overpayment of parking ticket violations, and to conduct a follow-up review to determine the status of recommendations made in the report entitled, "Review of the Award and Administration of Parking Ticket Processing and Delinquent Ticket Collection Services Contracts," dated July 12, 1995.

CONCLUSION

The Auditor concluded that DPW improperly accumulated and retained parking and certain moving violation ticket overpayments totaling approximately \$17.8 million between 1981 and 1997. The collection and retention of parking ticket overpayments has been a longstanding problem that managers of this contract have failed, over many years, to effectively address. Individual overpayments ranged from \$5 per ticket to \$310 per ticket.

DPW failed to establish a fair and effective policy to govern the prompt refund of ticket overpayments. Instead, DPW inappropriately reapplied some overpayments to other outstanding tickets without the consent or knowledge of persons making the overpayment, and DPW archived (removed ticket overpayments from the on-line ticket information system) most overpayments as a means of avoiding making refunds.

Some of the factors contributing to overpayments, as identified by the Auditor included: (1) delinquent parking notices being continually sent by Lockheed after payment had already been made; (2) delays in posting ticket payments to the Ticket Information Management System (TIMS); and (3) the failure of the Department of Public Works' Office of Information and Telecommunications Services (OITS) to timely update Division of Motor Vehicle (DMV) records when parking tickets were paid through the vehicle registration renewal process.

Within the sample of 314,600 ticket payments, the Auditor found that DPW's contractor for ticket processing and delinquent ticket collection services improperly collected over \$67,155 in fees from overpayments of delinquent tickets. Additionally, the Auditor found that the contractor collected \$5,368 in fees on double entries of ticket payments that were erroneously made by DPW's Office of Information and Telecommunication Services.

The Auditor's review of the status of recommendations made in a previous report dated July 12, 1995 found that, the Department of Public Works has implemented only one of the recommendations. DPW has not implemented any of the Auditor's other recommendations. The one recommendation that was addressed by DPW related to the assignment by Lockheed Martin IMS of delinquent parking tickets issued to District registered vehicles. The Auditor recommended the inclusion of a provision in future requests for proposals (RFP) and resulting delinquent ticket collection contracts requiring that delinquent tickets issued on vehicles registered in the District of Columbia

would not be eligible for delinquent ticket collection assignment for at least twelve months after the date of issuance or until the registration for the tag or the inspection sticker expires and the owner has not sought to renew for at least three months after the expiration date.

The Department of Public Works has included a provision in the RFP issued January 28, 1998 that requires the assignment of District of Columbia parking tickets 30 days after the expiration date of vehicle registration. If that date cannot be determined, tickets will not be assigned for delinquent ticket collection activity until after a 12 month period.

MAJOR FINDINGS

1. DPW improperly accumulated and retained parking ticket overpayments totaling approximately \$17.8 million.
2. Department of Public Works failed to establish a fair and effective policy to govern the refund of ticket overpayments.
3. DPW reapplied and archived over \$14.4 million of overpaid tickets without making an effort to refund the overpayments.
4. DPW failed to notify respondents concerning the disposition of overpayments.
5. Lockheed improperly collected approximately \$67,155 in fees from overpayment of delinquent tickets in the Auditor's sample.
6. DPW's Office of Information and Telecommunication Services (OITS) erroneously submitted double entries to Lockheed.

RECOMMENDATIONS

1. DPW immediately develop and implement an effective policy to govern and facilitate the timely refund of overpayments on parking tickets.
2. The Transportation Systems Administration (TSA) request monthly overpayment reports from Lockheed that indicate all ticket overpayments received by the District during the reporting period and the ongoing status concerning the disposition of each overpayment.
3. DPW immediately notify respondents who have made overpayments during the past five years to facilitate a refund or obtain consent for reapplication. Should DPW be unable to contact individuals who have made overpayments, it should then

publish the parking ticket control number, license plate number, state of vehicle registration, amount of the overpayment, and other necessary data in a newspaper of general circulation at least quarterly until all overpayments recorded in the TIMS over the past five years are refunded or reapplied to outstanding tickets issued to the same license plate.

4. DPW must discontinue the practice of archiving overpaid parking tickets without first issuing a refund or obtaining consent from the registered vehicle owner to reapply the payment to outstanding parking tickets issued to the same license plate.
5. DPW immediately request reimbursement of approximately \$67,155 in fees improperly collected by Lockheed from overpayments identified by the Auditor, and request reimbursement on all improperly collected fees not included in the Auditor's sample.
6. DPW's OITS immediately institute necessary changes to prevent double entries within its system that are subsequently transferred to Lockheed's Ticket Information Management System (TIMS).
7. DPW include appropriate language in future contracts to prohibit contractors from collecting fees from ticket overpayments and double entries.
8. DPW immediately request reimbursement of approximately \$5,368 in fees collected on double entries by Lockheed, during fiscal years 1996 and 1997, as identified by the Auditor.
9. DPW must require Lockheed to review its files for all double entries and make the appropriate adjustments and reimbursements.

PURPOSE

The purpose of this audit was to evaluate the Department of Public Works' (DPW) policy and process for handling overpayment of parking ticket violations, and to conduct a follow-up review to determine the status of recommendations made in the report entitled, "Review of the Award and Administration of Parking Ticket Processing and Delinquent Ticket Collection Services Contracts," dated July 12, 1995.

OBJECTIVES, SCOPE AND METHODOLOGY

The objectives of this audit were to:

1. evaluate the policy and process for handling overpayment of parking fines and penalties, the contractor's reporting of ticket overpayments to DPW, and the process used by the contractor and DPW to refund overpayments; and
2. determine actions taken to implement the recommendations made in the District of Columbia Auditor's previous report entitled, "Review of the Award and Administration of Parking Ticket Processing and Delinquent Ticket Collection Services Contracts," dated July 12, 1995.

The original scope of this audit included the activities noted above for the period October 1, 1995 through September 30, 1997. The scope was expanded to include the period prior to 1986 through 1995 to facilitate the Auditor's thorough review of all information pertaining to ticket overpayments.

In conducting this audit, the Auditor reviewed DPW's efforts to implement the recommendations made in the July 12, 1995 audit report of the ticket processing and delinquent ticket collection contracts. The Auditor also reviewed data provided by the contractor and DPW related to overpayments, and correspondence between DPW's Transportation Systems Administration (TSA) and the contractor related to overpayment of parking and certain moving violation fines and penalties.

Additionally, the Auditor conducted tests on a sample of ticket overpayment information obtained from the Ticket Information Management System (TIMS). The Auditor held discussions concerning ticket overpayments on numerous occasions with officials from DPW's TSA, Office of Management Services, and Office of Information and Telecommunication Services. The Auditor also discussed this matter with officials from Lockheed Martin IMS Corporation, the District's contractor for ticket processing and delinquent ticket collection services.

Our work was performed in accordance with generally accepted governmental auditing standards and included such tests of the records as deemed necessary under the circumstances.

BACKGROUND

The Traffic Adjudication Act of 1978 was enacted by the Council of the District of Columbia on June 30, 1978. This law decriminalized parking and minor moving violations, provided for the administrative adjudication of parking and certain moving violations, and provided for the civilian enforcement of parking laws and regulations. District of Columbia Code, Section 40-605(b) of the Traffic Adjudication Act of 1978 states, in relevant part, the following:

"... The Director may pay a reasonable percentage of monies collected to private agencies for the collection of fines, penalties and fees."

Pursuant to this authority and the authority to procure and contract for goods and services¹, the District government, through the Department of Administrative Services and the Department of Public Works, awarded contracts for the operation and maintenance of a parking ticket processing system and a delinquent parking ticket debt collection system. Lockheed Martin IMS Corporation, formerly known as DataCom Systems Corporation, has provided these services under two different contracts with the District government since the early 1980's. The ticket processing contract provides services for the processing of tickets issued for parking and certain moving violations in the District of Columbia. The delinquent ticket collection contract includes services pertaining to the collection of tickets that are outstanding 45 to 180 days or more after issuance. Over the five year period between 1992 and 1996, revenue collected as a result of the civilian enforcement and adjudication of parking and certain moving traffic violations has fluctuated significantly. Between 1992 and 1996, parking and moving violation fines and associated penalties and fees have generated between \$46 and \$58 million annually in revenue to the District. Table I highlights the District's parking revenue collections between 1992 and 1996.

**TABLE I
REVENUES FROM THE TRAFFIC AND PARKING PROGRAMS
CALENDAR YEARS
1992 THROUGH 1996**

Calendar Year	Amount
1992	\$ 58,181,730
1993	58,990,577
1994	54,247,917
1995	46,072,988
1996	50,403,639
Total	<u>\$ 267,896,851</u>

Source: DPW Annual Reports to the Council of the District of Columbia

¹The Procurement Practices Act of 1985 (D.C. Code, Section 1-1181.5), and Mayor's Order 90-178, effective November 19, 1990.

Management and Monitoring Responsibility

The Department of Public Works' Transportation Systems Administration is responsible for managing the ticket processing and delinquent ticket collection contracts on behalf of the District government. The Transportation Systems Administration has assigned one employee the responsibility of monitoring these technically complex contracts on a regular basis.

Short-Term Ticket Processing Contracts

The ticket processing contract with Lockheed expired October 12, 1997. Lockheed is currently operating on a 30-day sole source contract which expires March 26, 1998. Prior to the award of the 30-day sole source contract, DPW awarded Lockheed two 45-day sole source contracts to continue providing ticket processing services. A one-year sole source emergency contract is currently being prepared by DPW for the review and approval of the Council of the District of Columbia.

Status of Delinquent Ticket Collection Contract

The current delinquent ticket collection contract is in the third of four option years and expires in December 1998. On January 23, 1998, the Department of Public Works issued a request for proposals (RFP) to provide ticket processing services. Under the RFP reviewed by the Auditor, DPW plans to consolidate ticket processing services and delinquent ticket collection services into one contract. Additionally, processing, adjudication, and enforcement support related to litter control tickets and recycling tickets have also been incorporated into this RFP.

Assignment of Parking Tickets for Delinquent Collection Activity

Tickets not paid under Lockheed's ticket processing contract are assigned (referred to collections) to Lockheed under the delinquent ticket collection contract. Lockheed, not the District, determines when tickets are eligible for assignment in accordance with the criteria established in the delinquent ticket collection contract. Lockheed charges the District a fee of \$2.59 per ticket under the current ticket processing contract. However, the fee paid to Lockheed under the delinquent ticket collection contract is 39.8 percent of any fine and penalty collected on identified tickets, and 28.1 percent of any fine and penalty collected on unidentified tickets.

Tickets Assigned to Lockheed for Delinquent Collection Activity Are Classified as Identified or Unidentified

Delinquent tickets that are assigned to Lockheed for collection are classified as either identified or unidentified. Identified tickets have a valid name and address of the registered vehicle owner which is determined prior to the assignment. Unidentified tickets lack information concerning the name and address of the registered vehicle owner, and no prior notices have been mailed for these tickets under the ticket processing contract. It is Lockheed's responsibility to obtain a valid

name and address of the registered vehicle owner for all unidentified tickets. As previously noted, Lockheed is compensated at the rate of 39.8 percent for identified tickets and 28.1 percent for unidentified tickets. Under the delinquent ticket collection contract, Lockheed received total fees of approximately \$2,775,202 for fiscal year 1996 and approximately \$3,280,737 for fiscal year 1997. The majority of fees collected by Lockheed under the delinquent ticket collection contract for fiscal years 1996 and 1997 were for identified tickets.

Criteria For Assigning Tickets

Delinquent tickets are assigned and eligible for collection when they meet the following criteria:

- District identified parking tickets shall be assigned 45 days after the District has notified the registered vehicle owner by mail of his or her ticket liability on two occasions, or 30 days after the posting of a return mail indicator in the ticket processing system.
- Maryland or Virginia identified parking tickets shall be assigned to the contractor 45 days or more after the District has notified the registered vehicle owner by mail of his or her ticket liability on two occasions, or 30 days after the posting of a return mail indicator in the ticket processing system.
- Identified parking tickets written on out-of-state vehicles, other than those vehicles registered in Maryland and Virginia, shall be assigned to the contractor 45 days or more after the District has notified the registered vehicle owner by mail of his or her ticket liability on one occasion, or 30 days after the posting of a return mail indicator in the ticket processing system.
- Unidentified tickets written on vehicles registered in the District, Maryland or Virginia shall be assigned to the contractor 180 or more days after the issuance of the parking ticket. Unidentified parking tickets written on vehicles registered in all other states shall be assigned 90 days or more after the issuance of the parking ticket.

FINDINGS

DPW IMPROPERLY ACCUMULATED AND RETAINED PARKING TICKET OVERPAYMENTS TOTALING APPROXIMATELY \$17.8 MILLION

According to information provided to the Department of Public Works' Transportation Systems Administration (TSA) by Lockheed, for the period prior to 1986 through September 1, 1997, approximately 829,837 parking and certain moving violation tickets were overpaid totaling \$17,847,891. An overpayment occurs when an individual pays more than the required amount of the fine and penalty for a parking violation indicated on a ticket. The Auditor noted overpayments as low as \$5 per ticket to as high as \$310 per ticket. Table II details overpayments for the period pre-1986 through September 1, 1997.

**TABLE II
OVERPAID PARKING AND MOVING TICKETS
PRE-1986 THROUGH SEPTEMBER 1, 1997**

Calendar Year (s)	Total Count	Total Amount
Pre-1986 and 1986	187,065	\$3,102,926
1987	74,060	916,971
1988	69,686	911,067
1989	41,696	800,467
1990	41,286	934,015
1991	39,430	1,004,681
1992	41,746	1,064,361
1993	40,040	1,132,743
1994	18,516	580,834
1995	23,057	645,201
1996	15,638	494,348
1997, as of Sept. 1	23,928	859,719
1991-1994 *	146,921	3,952,871
1/1/90-8/31/93*	42,455	684,096
9/1/93 and After*	24,313	763,591
Total	829,837	\$17,847,891

Sources: Overpayment Plan Update dated August 23, 1994
Outstanding Overpaid Ticket Analysis dated September 1996
Overpayment Plate/Ticket Report dated October 1, 1997

* Represents additional overpayments of parking and moving tickets not previously included.

Prior to calendar year 1994, the Department of Public Works and Lockheed accumulated and retained overpayments without proposing a valid procedure for refunding the overpayments. During calendar year 1994, in an undated and unsigned document submitted for this audit, Lockheed officials addressed the overpayment problem and proposed the solution as outlined below:

"Problem:

One of the major causes of overpayments is the system logic which backs out the penalty for any payment received during the mail delay window from day 16 through day 25. For example, if a person mails in their payment including the penalty on day 16 and we receive it before day 25, the penalty is backed out of the ticket system and the ticket shows an overpaid status. It is at this point overpaid by the penalty amount.

Solution:

On May 2, 1994, we completed revising the ticket system grace period logic to accept payment in full (fine and penalty) for any mail-in ticket payment received after the ticket value doubles but within the mail delay window. This will prevent artificial overpayments from being registered on the ticket system. The penalty will continue to be backed out if the payment is received in the mail delay window for only the original fine amount."

The Auditor notes that this solution did not effectively address the overpayment problem. Overpayment of parking tickets and retention of those payments by the District continued through September 1, 1997, which is the point at which our review ended. Appendix I presents a sample of overpaid parking tickets that continued to be made well into fiscal year 1997.

**DEPARTMENT OF PUBLIC WORKS FAILED
TO ESTABLISH A FAIR AND EFFECTIVE POLICY
TO GOVERN THE REFUND OF TICKET OVERPAYMENTS**

The Department of Public Works' Transportation Systems Administration (1) failed to develop an effective policy for refunding parking ticket overpayments, (2) failed to develop reasonable and adequate procedures for notifying respondents of overpayments, and (3) failed to voluntarily refund any overpayments. Refunds were only issued by DPW when requested by individuals who had made an overpayment. Additionally, the Department of Public Works failed to include provisions in the ticket processing and delinquent ticket collection contracts to govern the refund of overpayments and fees collected by Lockheed on such payments. As a result, between the period pre-1986 through September 1, 1997 DPW accumulated and retained a backlog of overpayments on 829,837 tickets with a value of \$17.8 million.

DPW officials indicated their intention to begin notifying respondents of overpayments during the first quarter of fiscal year 1998. However, this notification would be limited to overpayments made during the period September 1, 1995 through September 1, 1997. Overpayments for this period are highlighted in Table III.

**TABLE III
OVERPAID PARKING TICKETS
SEPTEMBER 1, 1995 THROUGH SEPTEMBER 1, 1997**

Categories	Overpaid Tickets	Overpaid Amount
September 1, 1995 thru August 31, 1996	13,894	\$455,920
September 1, 1996 thru September 1, 1997	23,928	859,719
Overpaid Tickets Subtotal	37,822	1,315,639
Overpaid Tickets Issued to Rental Vehicles	1,536	33,566
Overpaid Tickets Issued to Diplomatic Plates	208	4,862
Total Overpaid Tickets	39,566	<u>\$1,354,067</u>

Source: Lockheed Martin IMS Overpaid Ticket Analysis.

The Auditor's review revealed that DPW has issued 250 initial refund notification letters as of February 3, 1998. Prior to this date, DPW had not initiated any efforts to refund accumulated overpayments.

To address the overpayment issue, DPW reduced overpayments by: (1) reapplying the overpayment to outstanding tickets issued against the same license plate; (2) archiving the overpaid tickets, which involves moving tickets from Lockheed's active database to its inactive database (i.e., moving tickets from on-line to an off-line status) based on a date criteria that includes closed tickets more than one year old and open tickets more than three years old; or (3) refunding the overpayment only if requested by the respondent. Despite these measures, DPW failed to develop an effective policy to voluntarily refund overpayments.

RECOMMENDATIONS

1. DPW immediately develop and implement an effective policy to govern and facilitate the timely refund of overpayments on parking and moving violation tickets.
2. The Transportation Systems Administration (TSA) request monthly overpayment reports from Lockheed that indicate all ticket overpayments received by the District during the reporting period and the ongoing status concerning the disposition of each overpayment.

DPW REAPPLIED AND ARCHIVED OVER \$14.4 MILLION OF OVERPAID TICKETS WITHOUT MAKING AN EFFORT TO REFUND THE OVERPAYMENTS

The Department of Public Works and Lockheed failed to take appropriate measures to refund overpayments on 829,837 parking and certain moving violation tickets totaling \$17,847,891. Instead, DPW reduced the pool of 829,837 overpaid tickets through the reapplication and archiving processes. The overpaid tickets were identified in the following Lockheed reports:

<u>Report Name</u>	<u>Report Date</u>	<u>Overpaid Tickets</u>	<u>Amount of Overpaid Ticket</u>
Overpayment Plan Update	August 23, 1994	620,293	\$11,895,753
Outstanding Overpaid Ticket Analysis	September 1996	169,978	4,598,071
Overpayment Plate/Ticket Report	October 1, 1997	<u>39,566</u>	<u>1,354,067</u>
Totals		829,837	\$ <u>17,847,891</u>

Table IV summarizes overpayments that were reapplied and archived for the period pre-1986 through 1997:

**TABLE IV
SUMMARY OF OVERPAID TICKETS REAPPLIED AND
ARCHIVED FOR THE PERIOD PRE-1986 THROUGH SEPTEMBER 1, 1997**

<u>Category</u>	<u>No. of Tickets</u>	<u>Dollar Amount</u>
Overpayment	829,837	\$17,847,891
Overpayment Reapplied	(60,989)	(1,229,921)
Overpayment Archived	<u>(664,238)</u>	<u>(13,198,650)</u>
Adjusted Overpayment Balance After Reapplication and Archiving	104,610	<u>\$3,419,320</u>

Sources: Overpayment Plan Update August 23, 1994
Outstanding Overpaid Ticket Analysis dated September 1996
Overpayment Plate/Ticket Report dated October 1, 1997

DPW officials inappropriately reapplied and archived approximately \$14.4 million in overpayments. DPW reapplied overpayments on 60,989 tickets totaling \$1,229,921 to other outstanding tickets issued against the same license plate. Another \$13,198,650 in overpayments on 664,238 tickets were removed through archiving. Archiving is an administrative procedure that allows DPW to reduce the number and dollar amount of overpayment tickets that were maintained in the active on-line system. This procedure had the effect of removing 664,238 overpaid tickets, totaling \$13,198,650, from an on-line to an off-line status with no effort being made to contact people who had made the overpayments. Discussions with Lockheed and DPW officials indicated that archived ticket data can be retrieved and restored to an on-line status within a twenty-four hour period. However, the Auditor notes that once tickets are moved off-line, they become inactive and are excluded from proposed overpayment notification processes. The Auditor further notes that even though the tickets have been archived, thousands of people are still due a refund for parking ticket overpayments made to the District of Columbia government. As a result of the reapplication and archiving of overpayments, 829,837 tickets and \$17,847,891 in overpayments were artificially reduced to 104,610 tickets and \$3,419,320 resulting in reductions of 87% and 81% respectively.

Archiving of overpaid parking tickets has resulted in a windfall to the District's general fund of at least \$13,198,650. There is no allocation in the current District budget to refund overpayments if individuals request refunds.

DPW FAILED TO NOTIFY RESPONDENTS CONCERNING THE DISPOSITION OF OVERPAYMENTS

DPW's decision to reapply \$1,229,921 in overpayments on 60,989 tickets to other outstanding tickets issued to the same license plate was inappropriate and ineffective in that notice of the overpayment and the disposition of the overpayment was never communicated to the individuals. DPW's failure to notify the respondents meant that overpayments would likely be made on the tickets to which an existing overpayment was reapplied. The decision to apply an overpayment to an outstanding ticket was made without the knowledge or consent of people who made these overpayments and, therefore, exacerbated the overpayment problem rather than corrected it.

The issue of applying overpayments to outstanding tickets (other than for which the payment was sent) was addressed in a memorandum dated August 23, 1994 from Lockheed to the TSA administrator. The memorandum indicated that Lockheed would contact respondents, by letter, who made overpayments after 1993 "...asking their preference for getting a refund of their overpayment or applying it to an outstanding ticket..." This memorandum was approved by the TSA administrator on August 24, 1994. The Auditor notes that this memorandum implies that respondents should have been given the opportunity to choose between receiving a refund or reapplying the overpayment to an outstanding ticket. Despite its acknowledgment that consent should be obtained, neither Lockheed nor DPW made any discernible effort to contact anyone concerning the disposition of their overpayment.

RECOMMENDATIONS

1. DPW immediately notify respondents who have made overpayments during the past five years to facilitate a refund or obtain consent for reapplication. Should DPW be unable to contact individuals who have made overpayments, it should then publish the parking ticket control number, license plate number, state of vehicle registration, amount of the overpayment, and other necessary data in a newspaper of general circulation at least quarterly until all overpayments recorded in the TIMS over at least the past five years are refunded or reapplied to outstanding tickets issued to the same license plate.
2. DPW must discontinue the practice of archiving overpaid parking tickets without first issuing a refund or obtaining consent from the registered vehicle owner to reapply the payment to outstanding parking tickets issued to the same license plate.

LOCKHEED IMPROPERLY COLLECTED APPROXIMATELY \$67,155 IN FEES FROM OVERPAYMENTS OF DELINQUENT TICKETS

The Auditor reviewed a sample of 314,600 delinquent ticket collections for fiscal years 1996 and 1997. The review revealed that approximately 4,114 tickets, or 1%, of our sample were overpaid in an amount totaling approximately \$177,664 with Lockheed receiving fees of approximately \$67,155 from the overpayments. Table V highlights fees collected improperly by Lockheed from overpaid parking and certain moving violation tickets.

**TABLE V
FEES COLLECTED BY LOCKHEED FROM OVERPAYMENTS:
FISCAL YEARS 1996 AND 1997**

Fiscal Year	No. of Tickets Overpaid	Amount of Tickets Collected	Fees Received by Lockheed
1996	1,488	\$64,756	\$24,000
1997	2,626	112,908	43,155
Total	4,114	\$177,664	\$67,155

Source: Lockheed's Fee Analysis Reports and Office the D.C. Auditor

Lockheed's collection of these fees was improper because Lockheed had already collected a fee for its efforts from the original payment-in-full. Any subsequent overpayment of parking tickets represented payments to which the District government and Lockheed were not entitled to keep. In a significant number of cases, the overpayments resulted from deficiencies in the ticket processing and delinquent ticket collection systems. For example, the Auditor noted overpayments that were made three (3) to thirteen (13) months after a ticket had already been paid-in-full. TSA officials attributed overpayments to the following:

- initially paying the ticket in full and later paying the same ticket that was listed on a subsequent notice of outstanding tickets sent by Lockheed;
- ticket payments not being recorded in the on-line ticket system in a timely manner;
- parking control aides writing a fine amount on a ticket that was greater than the fine amount shown on Lockheed's on-line fee tables. The respondent paid the amount written on the ticket but the on-line system reflected an overpayment; and
- a ticket is paid and the infraction is later dismissed but a refund is not processed.

Moreover, according to the Auditor's review, the primary factors contributing to overpayments being made up to thirteen months after the initial payment-in-full resulted from delinquent notices being continually sent by Lockheed after payment-in-full had already been made and the payment not being timely recorded in the Ticket Information Management System. This indicated that either the payment was not properly entered in the on-line system or the system has a deficiency which allows notices to continue to be sent to individuals for tickets that they have already paid-in-full.

In a review of 70 of the 1,488 overpaid tickets in fiscal year 1996, the Auditor found that approximately 25% continued to receive delinquent notices from Lockheed after tickets had been paid-in-full. Under the threat of having vehicles booted and towed to the impoundment lot and credit histories impaired, individuals have unnecessarily paid parking fines and penalties not legally due to the District.

The second factor contributing to overpayments included a delay between the transaction date and posting date (i.e. the date the payment was received and the date the payment was recorded in the on-line system). The Auditor observed instances in which there was a significant delay in posting payments received through the lockbox to the TIMS system. A sample of the delays in posting is presented in Table VI.

**TABLE VI
PAYMENTS NOT TIMELY POSTED IN LOCKHEED'S
TICKET INFORMATION MANAGEMENT SYSTEM**

<u>Ticket No.</u>	<u>Lockbox Transaction Date</u>	<u>Date Posted to TIMS</u>	<u>Approx. Processing Period</u>	<u>Amount</u>
778403581	April 10, 1995	Oct. 11, 1995	6 months	\$ 20
926998623	Aug. 21, 1995	Aug. 9, 1996	12 months	\$ 25
778367951	June 21, 1995	Oct. 11, 1995	4 months	\$ 40
768235226	Mar. 14, 1996	May 13, 1996	2 months	\$ 50
769399514	Mar. 14, 1996	May 13, 1996	2 months	\$ 15
926821383	July 7, 1996	July 25, 1996	1 month	\$ 55
927947812	June 14, 1996	Aug. 26, 1996	2 months	\$100

As a result of this deficiency (failure to timely record payments in the Ticket Information Management System) District residents, particularly, were prevented from renewing vehicle registration, and their vehicles were placed at risk of being booted and towed unless these improperly assessed fines were paid to the District. The data reviewed by the Auditor indicated that, in fact, some vehicles in our sample were booted and/or towed as a result of this deficiency.

Additionally, the Auditor found instances in which the Office of Information and Telecommunication Services' failure to update DMV renewal records contributed to overpayments. Table VII presents a sample of the impact of this deficiency.

**TABLE VII
SAMPLE IMPACT OF FAILURE TO UPDATE
DMV RENEWAL RECORDS**

<u>Ticket No.</u>	<u>Amount Due</u>	<u>Initial Ticket Payment Date</u>	<u>Date of Additional Ticket Payment w/Renewal of Vehicle Registration</u>	<u>Amount of Additional Payment</u>	<u>Total Delay In Posting</u>	<u>Overpaid Amount</u>
763946584	\$50	Sept. 13, 1995	Sept. 17, 1996 Sept. 3, 1997	\$ 50 \$ 50	1 yr. 2 yr.	\$ 50 \$ 50
779253311	\$105	Aug. 5, 1996	Aug. 7, 1997	\$105	1 yr.	\$ 105
778397616	\$105	May 31, 1996	May 22, 1997	\$105	1 yr.	\$ 105
782788016	\$105	April 1, 1996	April 2, 1997	\$105	1 yr.	\$ 105
783625463	\$205	May 17, 1996	July 1, 1997	\$205	14 mo.	\$ 205
783516532	\$205	June 3, 1996	April 22, 1997	\$205	11 mo.	\$ 205

**DPW'S OFFICE OF INFORMATION AND TELECOMMUNICATION SERVICES (OITS)
ERRONEOUSLY SUBMITTED DOUBLE ENTRIES TO LOCKHEED**

In addition to the overpaid tickets, the Auditor noted double entries of parking ticket payments on a sample of tickets taken from Lockheed's fee analysis reports which were submitted to TSA on a monthly basis. The double entries, within our sample, resulted in Lockheed improperly collecting fees totaling approximately \$5,368 on 214 tickets during fiscal years 1996 and 1997.

Discussions with DPW's TSA administrator and project monitor indicated that double entries occurred in DPW's OITS when payments were made in connection with Division of Motor Vehicle registration renewals. In an April 11, 1997 letter from Lockheed's project manager to TSA's project monitor/technical representative, the contractor identified 1,447 double entries and approximately \$10,882 in fees erroneously collected between 1990 and 1996 as a result of double entries of the same payment. The TSA administrator, in a May 14, 1997 memorandum, indicated "that OITS erroneously ran certain transactions more than once in extracting ticket payments made through the Signet Bank lockbox utilized by Motor Vehicle Services for mail registrations." The TSA administrator indicated that the double entry transactions, which resulted in duplicate fees being paid to the contractor, would be resolved with a one-time adjustment. Lockheed adjusted its May 6, 1997 invoice by approximately \$11,168 for fees improperly paid on double entries under its delinquent ticket collection contract.

The Auditor obtained from Lockheed's project manager for ticket processing a copy of a document entitled "Method for Handling Duplicate Payment Batches Received from OITS." The document set forth the following procedures to detect duplicate entries:

... "Each night, a single file is sent via the Daily File Transfer from OITS to IMS [Lockheed] containing payments processed for tickets included on registration hold notices. The file has a header that contains the date and the number of records. IMS accumulates these headers and compares the transmitted file with

all others sent before it. If there is a duplicate header, the job is aborted and the file is deleted. This is a standard procedure to ensure that batches that may be transmitted twice are not updated twice. This happens as part of the nightly update cycle and is not included on any standard reports."

Lockheed's project manager for delinquent ticket collections indicated that these procedures were implemented in November 1996. Despite the implementation of these procedures, the Auditor found that double entries continued to occur through September 1997. The Auditor notes that Lockheed's TIMS failed to identify and delete double entries. As a result of this failure, DPW should require Lockheed to review its files for all double entries of parking ticket payments over the past two (2) years and make the appropriate adjustments and reimbursements to the District.

RECOMMENDATIONS

1. DPW immediately request reimbursement of approximately \$67,155 in fees improperly collected by Lockheed from overpayments identified by the Auditor, and request reimbursement on all improperly collected fees not included in the Auditor's sample.
2. DPW's OITS immediately institute necessary changes to prevent double entries within its system that are subsequently transferred to Lockheed's Ticket Information Management System (TIMS).
3. DPW include appropriate language in future contracts to prohibit contractors from collecting fees on ticket overpayments and double entries.
4. DPW immediately request reimbursement of approximately \$5,368 in fees collected on double entries by Lockheed, during fiscal years 1996 and 1997, as identified by the Auditor.
5. DPW must require Lockheed to review its files for all double entries and make the appropriate adjustments and reimbursements.

STATUS OF RECOMMENDATIONS MADE SINCE THE AUDITOR'S LAST AUDIT OF THE TICKET PROCESSING AND DELINQUENT TICKET COLLECTION CONTRACTS

The status of recommendations made in the Auditor's report entitled, "Review of the Award and Administration of Parking Ticket Processing and Delinquent Ticket Collection Services Contracts," dated July 12, 1995, are as follows:

- *The Auditor recommended that the District require Lockheed to obtain consent from the contracting officer to subcontract any further work to be performed under the ticket processing contract.*
- *The Auditor recommended that the District require the subcontract with PRWT be terminated immediately.*
- *The Auditor recommended that any future subcontracts for imaging or any other services under the ticket processing contract must be approved by the District's contracting officer for the ticket processing contract, the Director of Administrative Services, before the subcontracts are awarded by Lockheed.*

No action has been taken concerning these recommendations. The contractor for the ticket processing and delinquent ticket collection contracts has three subcontractors : (1) Independence Federal Savings Bank provides lock-box services under the ticket processing contract; (2) PRWT Services and its affiliate D.C. PRWT Services provide ticket imaging and correspondence imaging under the ticket processing contract; and (3) KIDD International Data Processing Inc. provides data processing and administrative support under the delinquent ticket collection contract. These subcontracts were in place at the time of the last audit. The District's Department of Public Works has refused to require Lockheed to obtain TSA's consent or approval of subcontracts. DPW officials noted in their response to the Auditor's report of July 12, 1995 that, "...disclosure of subcontracting activities is not mandatory under Chapter 28 of the District's procurement regulations. In addition, it has always been the District Government's policy to [honor] a contractor 's agreement with its subcontractors." Additionally, the Auditor found that Lockheed utilized the services of a private attorney in connection with the delinquent ticket collection contract.

- *The Auditor recommended that the Department of Public Works and the D.C. Treasurer's Office take immediate steps to ensure that revenue collections reported by Lockheed and the District's Financial Management System are reconciled on a regular basis but not less than quarterly.*

The Auditor in the previous audit report identified a \$13.3 million discrepancy between revenue data in Lockheed's revenue reports and the District's financial management system. In response to the Auditor's recommendation, DPW concurred and noted that a review of revenue source code 1501 would be conducted within 30 days.

The only actions taken by TSA to date was to convene a meeting on May 23, 1996 to address the audit recommendations and referred the matter to the District's independent auditor KPMG Peat Marwick. The independent auditor was unable to reconcile the difference due to a lack of resources and "the lack of sufficient information." No further actions have been taken by DPW or the D.C. Treasurer to reconcile revenue collections reported by Lockheed and the District's Financial Management System.

Marwick. The independent auditor was unable to reconcile the difference due to a lack of resources and “the lack of sufficient information.” No further actions have been taken by DPW or the D.C. Treasurer to reconcile revenue collections reported by Lockheed and the District’s Financial Management System.

- *The Auditor recommended that the traffic enforcement program, with particular emphasis on revenue collections by the District and the District's ticket processing and delinquent ticket debt collection contractor, be included in the forthcoming annual audit conducted by the District's independent auditor.*
- *The Auditor recommended that the Council of the District of Columbia consider amending D.C. Code, Section 40-608 to change the period that data is reported by the Department of Public Works for the parking enforcement and adjudication programs from a calendar year basis (January 1st to December 31st) to a fiscal year basis (October 1st to September 30th). This change will facilitate comparisons, evaluations, and reviews of financial and management data concerning the parking enforcement and adjudication programs. Currently, some parking enforcement and traffic adjudication financial data is reported on a fiscal year basis (October 1st through September 30th) and other parking enforcement and traffic adjudication data is reported on a calendar year basis (January 1st through December 31st). This disparity in reporting requirements defeats meaningful, effective and efficient analysis and monitoring of program and financial activities.*

The traffic enforcement program, with particular emphasis on revenue collection by the District’s ticket processing and delinquent ticket debt collection contractor, was not included in the fiscal year 1996 and 1997 annual audit conducted by the District’s independent auditor. Further, the Council of the District of Columbia has not taken any action to amend D.C. Code, Section 40-608 to change the reporting period from a calendar year basis to a fiscal year basis for all data reported by the Department of Public Works for the parking enforcement and adjudication programs. Until changes are made to report program and financial data within compatible time frames, the data cannot be put to effective and meaningful use, is limited in value and usefulness to decision-makers and managers, and is a costly waste of revenue.

- *The Auditor recommended that the Department of Public Works' controllers office provide a history of how, why, when and by whom the practice of paying the ticket processing and delinquent ticket debt collection contractor from unappropriated traffic fine revenue through the revenue refund method was established.*

- *The Auditor recommended the Department of Public Works immediately cease the practice of paying Lockheed from unappropriated revenue, and seek an appropriation to pay for these services for the remainder of fiscal year 1995 and in future fiscal years or seek the passage of legislation which would establish a special account into which parking revenues necessary to pay for ticket processing and delinquent ticket collection services could be deposited and from which the contractor providing these services would be paid.*
- *The Auditor recommended that those employees and officials of the District government authorizing the obligation and expenditure of unappropriated parking revenue in violation of the Anti-Deficiency Act be held accountable according to the requirements of the Act.*
- *Those authorizing payments by using Revenue Refund Vouchers in the future should be held accountable for making vendor payments by improperly using these vouchers.*

The Controller of DPW was unable to provide a history of how, why, when and by whom the practice of paying the contractor from unappropriated traffic fine revenue was established. The DPW Controller further stated that it was an existing practice that predated him and that the persons responsible for this practice were no longer in government. Further, the DPW Director, thus far, has not obtained an appropriation to support the cost of this contract or the passage of legislation to establish a special account for parking revenues and the authority to pay for ticket processing and delinquent ticket debt collection services in the absence of an appropriation from Congress.

In fiscal year 1996, the contractor received \$ 4.6 million in revenue reimbursements from the District under the ticket processing contract and \$2.8 million under the delinquent ticket debt collection contract for a total payment of \$7.4 million. In fiscal year 1997, the contractor received \$6.0 million in revenue reimbursements from the District under the ticket processing contract and \$3.3 million under the delinquent ticket debt collection contract for a total payment of \$9.3 million. All of these payments were made by Revenue Refund Vouchers and therefore do not appear as expenditures in the District's FMS.

As previously noted, no action has been taken by the Department of Public Works or the District's Chief Financial Officer to cease this practice.

- *The Auditor recommended that in future contracts for delinquent ticket debt collection, the District include a provision in the request for proposals and the resulting contract that delinquent tickets for parking violations written on vehicles*

registered in the District of Columbia will not be eligible for delinquent ticket collection assignment for at least twelve months after the date of issuance or until the registration for the tag or inspection sticker expires and the owner of the vehicle has not sought to renew for at least three months after the expiration date.

The Request For Proposals to provide parking ticket processing and delinquent ticket debt collection services to the District includes Section B 5.8 (2) which states that District of Columbia parking tickets shall be assigned 30 days after the expiration date of the vehicle registration in effect at the time of the issuance of the ticket. If the date cannot be determined by the ticket system, these tickets shall be assigned 365 days after the date of ticket issuance.

- *The Auditor recommended that the Department of Public Works' Office of Information Services work in concert with the Bureau of Motor Vehicle Services and the Bureau of Traffic Adjudication to devise a methodology to share vital information which would result in tracking those individuals whose vehicles are registered in the District of Columbia that have outstanding parking violation tickets and prevent them from renewing a driver license, renewing vehicle registration, obtaining an inspection sticker, and obtaining a new license plate until they have satisfied their obligations to the District of Columbia for delinquent tickets. The District of Columbia should use all of the tools and methodologies available to it before assigning tickets to its collection contractor which charges extraordinary fees for tickets that will likely be paid within a six month period.*

There have been several meetings in an effort to define the necessary system modifications to allow the Department of Public Works' Bureau of Motor Vehicle Services and the Bureau of Traffic Adjudication to share vital information. To date, this sharing of information has not been efficient. Therefore, Lockheed continues to be paid unnecessarily for collecting revenue that the District would likely be able to collect.

CONCLUSION

The Auditor concluded that DPW improperly accumulated and retained parking and certain moving violation ticket overpayments totaling approximately \$17.8 million between 1981 and 1997. The collection and retention of parking ticket overpayments has been a longstanding problem that managers of this contract have failed, over many years, to effectively address. Individual overpayments ranged from \$5 per ticket to \$310 per ticket.

DPW failed to establish a fair and effective policy to govern the prompt refund of ticket overpayments. Instead, DPW inappropriately reapplied some overpayments to other outstanding tickets without the consent or knowledge of persons making the overpayment, and DPW archived (removed ticket overpayments from the on-line ticket information system) most overpayments as a means of avoiding making refunds.

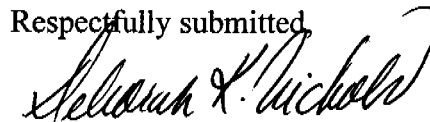
Some of the factors contributing to overpayments, as identified by the Auditor included: (1) delinquent parking notices being continually sent by Lockheed after payment had already been made; (2) delays in posting ticket payments to the Ticket Information Management System (TIMS); and (3) the failure of the Department of Public Works' Office of Information and Telecommunications Services (OITS) to timely update Division of Motor Vehicle (DMV) records when parking tickets were paid through the vehicle registration renewal process.

Within the sample of 314,600 ticket payments, the Auditor found that DPW's contractor for ticket processing and delinquent ticket collection services improperly collected over \$67,155 in fees from overpayments of delinquent tickets. Additionally, the Auditor found that the contractor collected \$5,368 in fees on double entries of ticket payments that were erroneously made by DPW's Office of Information and Telecommunication Services.

The Auditor's review of the status of recommendations made in a previous report dated July 12, 1995 found that, the Department of Public Works has implemented only one of the recommendations. DPW has not implemented any of the Auditor's other recommendations. The one recommendation that was addressed by DPW related to the assignment Lockheed Martin IMS of delinquent parking tickets to issued to District registered vehicles. The Auditor recommended the inclusion of a provision in future requests for proposals (RFP) and resulting delinquent ticket collection contracts requiring that delinquent tickets issued on vehicles registered in the District of Columbia would not be eligible for delinquent ticket collection assignment for at least twelve months after the date of issuance or until the registration for the tag or the inspection sticker expires and the owner has not sought to renew for at least three months after the expiration date.

The Department of Public Works has included a provision in the RFP issued January 28, 1998 that requires the assignment of District of Columbia parking tickets 30 days after the expiration date of vehicle registration. If that date cannot be determined, tickets will not be assigned for delinquent ticket collection activity until after a 12 month period.

Respectfully submitted,



Deborah K. Nichols

Interim District of Columbia Auditor

APPENDIX

FISCAL YEAR 1996 AND 1997 DUPLICATE PAYMENTS

Ticket No.	St	Plate	Assign.	Y1	Fine	Penalty	Amount	Fee	Issue Date	Pay Date	Overpaid	Lockheed Overpaid
200006553	DC	739969	682	ID	50	55	105	42	10/16/96	7/18/97		
200006553	DC	739969	682	ID	50	55	105	42	10/16/96	8/5/97	\$105	\$41.79
200015970	MD	AZW737	682	ID	20	25	45	18	10/15/96	3/28/97		
200015970	MD	AZW737	682	ID	20	25	45	18	10/15/96	4/28/97	\$45	\$17.91
200042544	DC	685673	682	ID ³	20	25	45	18	10/17/96	5/5/97		
200042544	DC	685673	682	CID	20	25	45	18	10/17/96	7/8/97	\$45	\$17.91
200044165	VA	NOORDER	682	ID	15	20	35	14	10/17/96	5/15/97		
200044165	VA	NOORDER	682	ID	15	20	35	14	10/17/96	8/11/97	\$35	\$13.93
200046814	DC	743152	682	ID	20	25	45	0	10/17/96	3/11/97		
200046814	DC	743152	682	ID	20	25	45	18	10/17/96	5/5/97	\$45	\$17.91
200055866	MD	DJR780	682	ID	15	20	35	14	10/22/96	5/5/97		
200055866	MD	DJR780	682	ID	15	20	35	14	10/22/96	7/31/97	\$35	\$13.93
200094926	FL	SJA08W	681	ID	50	55	100	40	10/21/96	2/21/97		
200094926	FL	SJA08W	681	ID	50	55	105	42	10/21/96	3/21/97	\$100	\$39.80
200097601	VA	ZUE9865	682	ID	15	20	35	14	10/22/96	5/21/97		
200097601	VA	ZUE9865	682	ID	15	20	35	14	10/22/96	5/29/97	\$35	\$13.93
200101823	VA	ZMM6663	683	ID	20	25	25	10	10/22/96	7/7/97		
200101823	VA	ZMM6663	683	ID	20	25	25	10	10/22/96	7/7/97	\$5	\$1.99
200120266	DC	773732	683	CID	15	20	35	14	10/30/96	7/29/97		
200120266	DC	773732	683	CID	15	20	35	14	10/30/96	7/29/97	\$35	\$13.93
200121681	NJ	MA189P	681	TID	15	20	35	0	10/30/96	3/3/97		
200121681	NJ	MA189P	681	ID	15	20	35	14	10/30/96	3/6/97	\$35	\$13.93
200207501	MD	ZEH095	683	ID	20	25	45	18	11/27/96	4/28/97		
200207501	MD	ZEH095	683	ID	20	25	45	18	11/27/96	6/30/97	\$45	\$17.91
200216682	NY	F938DB	681	ID	50	55	105	42	10/24/96	4/18/97	\$105	\$41.79
200216682	NY	F938DB	681	ID	50	55	105	42	10/24/96	4/10/97		
200222492	MD	728204M	682	OID	20	25	45	18	10/21/96	5/8/97		
200222492	MD	728204M	682	ID	20	25	45	18	10/21/96	5/23/97	\$45	\$17.91
200229842	VA	ZNK9545	682	ID	50	55	105	42	10/23/96	5/5/97		
200229842	VA	ZNK9545	682	ID	50	55	80	32	10/23/96	7/31/97	\$80	\$31.84
200230096	TX	HX7841	681	ID	50	55	100	40	10/29/96	2/21/97		
200230096	TX	HX7841	681	ID	50	55	105	42	10/29/96	3/21/97	\$100	\$39.80
200236783	TX	HX7809	681	ID	50	55	100	40	10/29/96	2/21/97		
200236783	TX	HX7809	681	ID	50	55	105	42	10/29/96	3/21/97	\$100	\$39.80
200278083	MD	901406M	682	ID	15	20	35	14	10/22/96	5/5/97		
200278083	MD	901406M	682	ID	15	20	35	14	10/22/96	7/25/97	\$35	\$13.93
200278746	MD	764ALV	682	ID	15	20	30	0	10/23/96	3/12/97		
200278746	MD	764ALV	682	ID	15	20	35	14	10/23/96	4/21/97	\$30	\$11.94
200283624	MD	801582M	682	ID	20	25	45	18	10/23/96	5/5/97		
200283624	MD	801582M	682	ID	20	25	45	18	10/23/96	7/25/97	\$45	\$17.91
200291081	OH	ADDVTG	681	ID	20	25	45	18	10/22/96	3/21/97		
200291081	OH	ADDVTG	681	ID	20	25	45	18	10/22/96	4/8/97	\$45	\$17.91
200314564	MD	DJX760	682	ID	50	55	50	20	10/21/96	5/5/97		
200314564	MD	DJX760	682	ID	50	55	105	42	10/21/96	5/20/97	\$50	\$19.90

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774497511 DC 617468	658 CID	20	25	45	14	10/26/94	5/29/96		
774497511 DC 617468	658 CID	20	25	45	14	10/26/94	5/21/97	\$45	\$13.50
774553975 DC 305230	659 CID	15	20	35	11	11/9/94	4/8/96		
774553975 DC 305230	659 CID	15	20	35	11	11/9/94	4/8/97	\$35	\$10.50
774621551 VA OTT442	659 ID	20	25	40	12	11/15/94	11/4/96		
774621551 VA OTT442	659 ID	20	25	40	12	11/15/94	2/6/97	\$35	\$13.93
774650225 DC 444711	659 TID	50	55	105	0	11/22/94	5/2/96		
774650225 DC 444711	659 CID	50	55	105	32	11/22/94	7/18/97	\$105	\$31.50
774718243 DC 262754	659 ID	20	25	45	14	11/22/94	2/21/96		
774718243 DC 262754	659 CID	20	25	45	14	11/22/94	6/17/96	\$45	\$13.50
774775584 DC 409596	659 ID	50	55	105	32	11/21/94	10/5/95		
774775584 DC 409596	659 CID	50	55	105	32	11/21/94	11/17/95	\$105	\$31.50
774776332 DC 684188	659 CID	50	55	105	32	11/21/94	7/11/96		
774776332 DC 684188	659 CID	50	55	105	32	11/21/94	7/18/97	\$105	\$31.50
774791172 VA AAJ4924	660 ID	15	20	35	14	11/28/94	10/19/95		
774791172 VA AAJ4924	660 ID	15	20	15	6	11/28/94	11/24/95	\$15	\$5.97
774852315 DC 661193	660 OID	20	25	45	18	12/8/94	10/21/95		
774852315 DC 661193	660 CID	20	25	45	18	12/8/94	10/21/95	\$45	\$17.91
774888376 DC 450314	660 CID	50	55	105	42	11/22/94	8/2/96		
774888376 DC 450314	660 CID	50	55	105	42	11/22/94	7/30/97	\$105	\$31.50
774969860 DC 563070	659 CID	20	25	45	14	11/23/94	7/1/96		
774969860 DC 563070	659 CID	20	25	45	14	11/23/94	7/1/97	\$45	\$13.50
774972741 DC 693232	659 ID	15	20	15	5	11/23/94	10/11/95		
774972741 DC 693232	659 ID	15	20	15	5	11/23/94	10/18/95		
774972741 DC 693232	659 ID	15	20	15	5	11/23/94	10/23/95	\$10	\$3.00
775032812 DC 651821	660 BID	20	25	45	0	12/5/94	11/20/95		
775032812 DC 651821	660 ID	20	25	45	18	12/5/94	2/1/96	\$45	\$17.91
775060930 VA EW3369	659 ID	20	25	45	14	11/17/94	11/4/96		
775060930 VA EW3369	659 ID	20	25	45	14	11/17/94	2/6/97	\$45	\$13.50
775112796 DC 611577	659 CID	15	20	5	0	11/25/94	4/16/96	\$5	
775112796 DC 611577	659 CID	15	20	35	0	11/25/94	4/16/96		
775167934 DC 151488	659 CID	20	25	45	14	11/28/94	5/22/96		
775167934 DC 151488	659 CID	20	25	45	14	11/28/94	5/22/96		
775167934 DC 151488	659 ID	20	25	(45)	(14)	11/28/94	11/11/96		
775167934 DC 151488	659 CID	20	25	45	14	11/28/94	5/7/97	\$45	\$13.50
775270296 VA ZXF8905	660 ID	25	30	55	22	12/14/94	1/17/96		
775270296 VA ZXF8905	660 ID	25	30	55	22	12/14/94	2/2/96	\$55	\$21.89
775285232 DC 155409	660 CID	20	25	45	18	12/15/94	5/22/96		
775285232 DC 155409	660 CID	20	25	45	18	12/15/94	5/22/96		
775285232 DC 155409	660 ID	20	25	(45)	(18)	12/15/94	11/11/96		
775285232 DC 155409	660 CID	20	25	45	18	12/15/94	5/22/97	\$45	\$17.91
775379780 DC 504908	660 CID	20	25	45	18	12/14/94	7/12/96		
775379780 DC 504908	660 CID	20	25	45	18	12/14/94	7/12/96		
775379780 DC 504908	660 ID	20	25	(45)	(18)	12/14/94	11/11/96		
775379780 DC 504908	660 CID	20	25	45	18	12/14/94	7/1/97	\$45	\$17.91
775398050 DC 552898	660 OID	20	25	5	2	12/19/94	4/24/96		
775398050 DC 552898	660 OID	20	25	20	8	12/19/94	8/13/96		
775398050 DC 552898	660 CID	20	25	25	10	12/19/94	4/23/97	\$5	\$1.99

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785642056 NY M7T260	667 ID	20	25	40	0	9/6/95	12/29/95		
785642056 NY M7T260	667 ID	20	25	45	18	9/6/95	2/6/96	\$40	\$15.92
785658510 DC 751324	669 TID	50	55	105	0	9/7/95	7/10/96		
785658510 DC 751324	669 CID	50	55	105	42	9/7/95	7/31/97	\$105	\$41.79
785684841 DC 644548	668 ID	15	20	35	14	8/28/94	2/27/96		
785684841 DC 644548	668 ID	15	20	35	14	8/28/94	2/27/96	\$35	\$13.93
785700845 FL PFA55X	667 ID	15	20	35	14	9/6/95	3/22/96		
785700845 FL PFA55X	667 ID	15	20	35	14	9/6/95	4/22/96	\$35	\$13.93
785713353 DC 689885	669 ID	100	105	205	82	9/11/95	4/26/96		
785713353 DC 689885	669 ID	100	105	205	82	9/11/95	5/3/96	\$205	\$81.59
785713364 DC 689885	669 ID	15	20	35	14	9/11/95	4/26/96		
785713364 DC 689885	669 ID	15	20	35	14	9/11/95	5/3/96	\$35	\$13.93
785714215 MD CSA423	669 ID	15	20	35	14	9/11/95	5/31/96		
785714215 MD CSA423	669 ID	15	20	35	14	9/11/95	6/24/96	\$35	\$13.93
785717542 MD 212978	669 ID	20	25	40	16	9/11/95	3/21/96		
785717542 MD 212978	669 ID	20	25	45	18	9/11/95	3/22/96	\$40	\$15.92
785723024 NJ OXV1519	667 ID	50	55	50	20	8/25/95	2/4/97		
785723024 NJ OXV1519	667 ID	50	55	50	20	8/25/95	2/4/97		
785723024 NJ OXV1519	667 ID	50	55	50	20	8/25/95	2/4/97		
785723024 NJ OXV1519	667 ID	50	55	50	20	8/25/95	2/4/97		
785723024 NJ OXV1519	667 ID	50	55	50	20	8/25/95	2/4/97	\$145	\$57.71
785723046 NJ OZZ491	667 ID	50	55	50	20	8/25/95	2/4/97		
785723046 NJ OZZ491	667 ID	50	55	50	20	8/25/95	2/4/97		
785723046 NJ OZZ491	667 ID	50	55	50	20	8/25/95	2/4/97	\$45	\$17.91
785730503 DC 751338	668 ID	20	25	45	18	8/29/95	5/22/96		
785730503 DC 751338	668 ID	20	25	45	18	8/29/95	5/22/96	\$45	\$17.91
785736210 VA ZUP1843	668 ID	15	20	35	14	8/29/95	6/10/96		
785736210 VA ZUP1843	668 ID	15	20	35	14	8/29/95	7/2/96	\$35	\$13.93
785737304 DC 375626	668 ID	15	20	20	8	8/30/95	1/31/96		
785737304 DC 375626	668 ID	15	20	20	8	8/30/95	2/9/96	\$5	\$1.99
785737573 MD BZM094	668 ID	50	55	105	42	8/29/95	5/17/96		
785737573 MD BZM094	668 ID	50	55	105	42	8/29/95	5/31/96	\$105	\$41.79
785739194 PQ A3346	675 ID	50	55	100	40	9/1/95	9/3/96		
785739194 PQ A3346	675 ID	50	55	105	42	9/1/95	10/2/96	\$100	\$39.80
785739942 VA ZPD6230	668 ID	20	25	45	18	9/1/95	3/12/97		
785739942 VA ZPD6230	668 ID	20	25	45	18	9/1/95	3/12/97	\$45	\$17.91
785740616 DC 568040	668 OID	20	25	45	18	8/30/95	8/8/96		
785740616 DC 568040	668 CID	20	25	45	18	8/30/95	7/30/97	\$45	\$17.91
785742613 DC 375626	668 ID	15	20	20	8	8/30/95	1/31/96		
785742613 DC 375626	668 ID	15	20	20	8	8/30/95	2/9/96	\$5	\$1.99
785745601 CA 1RJB918	668 ID	15	20	30	12	8/31/95	2/20/96		
785745601 CA 1RJB918	668 ID	15	20	20	8	8/31/95	3/15/96	\$15	\$5.97
785748725 NJ GOC60G	667 ID	20	25	45	18	9/1/95	2/9/96		
785748725 NJ GOC60G	667 ID	20	25	45	18	9/1/95	2/21/96	\$45	\$17.91
785765864 NJ OXV9848	667 ID	50	55	50	20	9/5/95	2/4/97		
785765864 NJ OXV9848	667 ID	50	55	50	20	9/5/95	2/4/97		
785765864 NJ OXV9848	667 ID	50	55	50	20	9/5/95	2/4/97	\$45	\$17.91

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790120310 DC 771951	673 ID	100	105	205	82	1/10/96	8/20/96		
790120310 DC 771951	673 ID	100	105	205	82	1/10/96	8/20/96	\$205	\$81.59
790120811 DC 491799	673 ID	15	20	20	8	1/22/96	6/28/96		
790120811 DC 491799	673 ID	15	20	20	8	1/22/96	8/16/96	\$5	\$1.99
790121625 DC 581351	673 CID	50	55	105	42	1/19/96	11/30/96		
790121625 DC 581351	673 CID	50	55	105	42	1/19/96	11/30/96	\$105	\$41.79
790135474 DC 312533	673 CID	50	55	105	42	1/22/96	7/16/96		
790135474 DC 312533	673 CID	50	55	105	42	1/22/96	7/23/97	\$105	\$41.79
790138565 VA ZMC1414	247 ID	20	20	40	16	1/22/96	8/15/96		
790138565 VA ZMC1414	247 ID	20	20	40	16	1/22/96	8/15/96	\$40	\$15.92
790142264 OH LBB768	672 ID	20	25	40	16	1/23/96	7/11/96		
790142264 OH LBB768	672 ID	20	25	45	18	1/23/96	8/22/96	\$40	\$15.92
790148472 CA 2BAX499	673 ID	20	25	45	18	1/24/96	8/6/96		
790148472 CA 2BAX499	673 ID	20	25	45	18	1/24/96	8/6/96	\$45	\$17.91
790155623 DC 778507	673 ID	20	25	25	10	1/24/96	7/22/96		
790155623 DC 778507	673 ID	20	25	25	10	1/24/96	8/21/96	\$5	\$1.99
790175971 VA ZSF8579	673 ID	15	20	20	0	1/19/96	6/12/96		
790175971 VA ZSF8579	673 ID	15	20	20	8	1/19/96	7/12/96	\$5	\$1.99
790176940 MD WHT922	673 ID	50	55	55	22	1/16/96	7/15/96		
790176940 MD WHT922	673 ID	50	55	55	22	1/16/96	10/7/96	\$5	\$1.99
790184463 VA ZPB1703	673 ID	15	20	35	14	1/26/96	8/2/96		
790184463 VA ZPB1703	673 ID	15	20	35	14	1/26/96	8/2/96	\$35	\$13.93
790185476 DC 507029	673 OID	50	55	105	42	1/27/96	8/16/96		
790185476 DC 507029	673 CID	50	55	105	42	1/27/96	7/31/97	\$105	\$41.79
790192233 DC 454636	673 ID	20	25	45	0	1/30/96	6/20/96		
790192233 DC 454636	673 ID	20	25	45	18	1/30/96	8/16/96	\$45	\$17.91
790205264 DC SKIERS	673 CID	15	20	35	14	1/24/96	8/6/96		
790205264 DC SKIERS	673 CID	15	20	35	14	1/24/96	9/30/96	\$35	\$13.93
790209151 VA ZYU1875	673 ID	50	55	55	0	1/24/96	6/18/96		
790209151 VA ZYU1875	673 ID	50	55	55	22	1/24/96	7/19/96	\$5	\$1.99
790212010 VA ZTU8318	673 ID	15	20	35	14	1/25/96	3/12/97		
790212010 VA ZTU8318	673 ID	15	20	35	14	1/25/96	5/5/97	\$35	\$13.93
790212975 VA ZTU8318	673 ID	15	20	35	14	1/26/96	3/12/97		
790212975 VA ZTU8318	673 ID	15	20	35	14	1/26/96	5/5/97	\$35	\$13.93
790214961 MD BNA835	673 ID	15	20	35	14	1/22/96	8/23/96		
790214961 MD BNA835	673 ID	15	20	35	14	1/22/96	8/28/96	\$35	\$13.93
790270736 DC 704813	672 ID	50	55	105	0	1/3/96	5/20/96		
790270736 DC 704813	672 ID	50	55	105	42	1/3/96	6/3/96	\$105	\$41.79
790275076 DC 290404	673 OID	20	25	45	18	1/5/96	5/2/97		
790275076 DC 290404	673 CID	20	25	45	18	1/5/96	7/18/97	\$45	\$17.91
790276336 OR UMK774	672 ID	15	20	20	8	1/5/96	6/25/96		
790276336 OR UMK774	672 ID	15	20	20	8	1/5/96	7/24/96	\$5	\$1.99
790289581 MD BND838	673 ID	20	25	50	0	1/19/96	6/20/96	\$5	
790289581 MD BND838	673 ID	20	25	45	18	1/19/96	7/15/96	\$45	\$15.91
790290841 MD ALD026	673 ID	15	20	35	14	1/22/96	9/10/96		
790290841 MD ALD026	673 ID	15	20	35	14	1/22/96	10/1/96	\$35	\$13.93

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791735405 VA WCI536	674 ID	20	25	25	10	3/6/96	9/9/96		
791735405 VA WCI536	674 ID	20	25	25	10	3/6/96	9/30/96	\$5	\$1.99
791755941 VA ZMZ2931	675 BID	20	25	45	0	3/11/96	8/26/96		
791755941 VA ZMZ2931	675 ID	20	25	45	18	3/11/96	9/23/96	\$45	\$17.91
791762613 VA ZVX6597	675 ID	50	55	105	42	3/11/96	9/20/96		
791762613 VA ZVX6597	675 ID	50	55	105	42	3/11/96	10/21/96	\$105	\$41.79
791765181 MD 00051B	248 ID	20	25	45	18	3/12/96	2/14/97		
791765181 MD 00051B	248 ID	20	20	40	16	3/12/96	2/21/97	\$40	\$15.92
791770206 CA 3JKY557	674 ID	20	25	40	0	2/28/96	7/22/96		
791770206 CA 3JKY557	674 ID	20	25	45	18	2/28/96	9/4/96	\$40	\$15.92
791771514 MO P5H062	673 ID	20	25	45	18	3/4/96	9/3/96		
791771514 MO P5H062	673 ID	20	25	45	18	3/4/96	9/3/96	\$45	\$17.91
791775084 VA ZUN2612	674 ID	20	25	20	8	2/29/96	8/26/96		
791775084 VA ZUN2612	674 ID	20	25	45	18	2/29/96	9/3/96	\$20	\$7.96
791786052 NY J123WT	673 ID	20	25	40	16	3/5/96	6/27/96		
791786052 NY J123WT	673 ID	20	25	25	10	3/5/96	7/30/96	\$20	\$7.96
791823443 IL VP6237	673 ID	50	55	100	0	3/1/96	6/20/96		
791823443 IL VP6237	673 ID	50	55	105	42	3/1/96	7/24/96	\$100	\$39.80
791826792 DC 643081	674 CID	15	20	20	8	3/1/96	11/15/96		
791826792 DC 643081	674 OID	15	20	35	14	3/1/96	11/21/96	\$5	\$1.99
791826792 DC 643081	674 OID	15	20	(15)	0	3/1/96	10/17/96		
791827702 IL GFS462	673 ID	20	25	40	0	3/1/96	6/21/96		
791827702 IL GFS462	673 ID	20	25	25	10	3/1/96	8/12/96	\$20	\$7.96
791829356 MO P5H062	673 ID	20	25	45	18	3/4/96	9/3/96		
791829356 MO P5H062	673 ID	20	25	45	18	3/4/96	9/3/96	\$45	\$17.91
791839414 NJ BFD88Z	673 ID	20	25	40	16	3/5/96	6/27/96		
791839414 NJ BFD88Z	673 ID	20	25	25	10	3/5/96	7/1/96	\$20	\$7.96
791848982 VA XIR883	675 ID	15	20	35	14	3/7/96	5/12/97		
791848982 VA XIR883	675 ID	15	20	35	14	3/7/96	8/11/97	\$35	\$13.93
791854700 DC 777664	675 ID	15	20	35	14	3/7/96	1/13/97	\$30	\$11.94
791854700 DC 777664	675 ID	15	20	30	12	3/7/96	10/28/96		
791856995 DC 761960	675 ID	50	55	55	22	3/7/96	9/5/96		
791856995 DC 761960	675 ID	50	55	55	22	3/7/96	10/7/96	\$5	\$1.99
791896103 FL QEK84P	673 ID	15	20	35	14	3/8/96	9/10/96		
791896103 FL QEK84P	673 ID	15	20	35	14	3/8/96	10/21/96	\$35	\$13.93
791917755 DC 637599	675 ID	50	55	105	42	3/12/96	11/29/96	\$105	\$41.79
791917755 DC 637599	675 OID	50	55	105	42	3/12/96	11/7/96		
791925820 SC KXC895	675 ID	20	25	45	18	3/15/96	9/16/96		
791925820 SC KXC895	675 ID	20	25	45	18	3/15/96	10/28/96	\$45	\$17.91
791927942 DC 649597	675 ID	15	20	25	10	3/18/96	8/30/96		
791927942 DC 649597	675 ID	15	20	35	14	3/18/96	9/16/96	\$25	\$9.95
791928491 NJ KT398E	674 ID	20	25	45	18	3/19/96	9/9/96		
791928491 NJ KT398E	674 ID	20	25	45	18	3/19/96	9/9/96	\$45	\$17.91
791930705 IL QT2517	674 ID	15	20	35	14	3/18/96	8/27/96		
791930705 IL QT2517	674 ID	15	20	35	14	3/18/96	9/18/96	\$35	\$13.93
791932444 MD DCJ291	675 ID	50	55	55	0	3/18/96	8/23/96		
791932444 MD DCJ291	675 ID	50	55	100	0	3/18/96	8/23/96	\$50	
791932444 MD DCJ291	675 ID	50	55	55	22	3/18/96	9/4/96	\$55	\$21.89

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916509366 NY R3R500	664 ID	20	25	40	16	5/26/95	11/3/95		
916509366 NY R3R500	664 ID	20	25	25	10	5/26/95	11/13/95	\$15	\$5.97
916509381	825 ID	25	0	50	0	6/1/95	8/22/95	\$50	
916509381	825 ID	25	0	25	0	6/1/95	6/7/95		
916529891	813 OID	15	15	30	0	5/24/94	5/19/97		
916529891	813 ID	15	15	30	0	5/24/94	5/20/97	\$30	
916619874 FL QNN21M	668 ID	20	25	40	16	10/14/95	3/1/96	\$40	\$15.92
916619874 FL QNN21M	668 ID	20	25	45	18	10/14/95	4/15/96		
916619874 FL QNN21M	668 ID	20	25	10	4	10/14/95	4/15/96	\$10	\$3.98
916621381 VA H55000	670 ID	20	25	40	0	10/10/95	3/18/96		
916621381 VA H55000	670 ID	20	25	45	18	10/10/95	4/8/96	\$40	\$15.92
916643265 DC 749661	673 CID	50	55	105	42	1/31/96	8/9/96		
916643265 DC 749661	673 CID	50	55	105	42	1/31/96	7/7/97	\$105	\$41.79
916647804 VA ZUG2851	679 ID	100	105	200	80	7/21/96	3/26/97		
916647804 VA ZUG2851	679 ID	100	105	205	82	7/21/96	4/15/97	\$200	\$79.60
916707875 DC 489024	651 ID	20	25	45	14	3/14/94	11/12/96		
916707875 DC 489024	651 ID	20	25	45	14	3/14/94	12/13/96	\$45	\$13.50
916775576 DC 485299	655 CID	15	20	20	6	5/6/94	3/6/96		
916775576 DC 485299	655 CID	15	20	20	6	5/6/94	3/11/97	\$5	\$1.99
916951814 NJ NV182Y	683 BID	20	25	45	0	12/29/96	5/20/97		
916951814 NJ NV182Y	683 ID	20	25	45	18	12/29/96	5/27/97	\$45	\$17.91
917093483 DC C56342	662 CID	20	25	45	0	6/20/94	7/14/97		
917093483 DC C56342	662 CID	20	25	45	0	6/20/94	7/14/97	\$45	
917455420 DC 713721	687 ID	20	25	45	18	3/23/97	8/25/97		
917455420 DC 713721	687 ID	20	25	40	0	3/23/97	8/8/97	\$40	\$15.92
917509401	815 OID	15	15	30	9	5/6/94	5/21/97		
917509401	815 ID	15	15	30	9	5/6/94	5/22/97	\$30	\$9.00
917635423 MD BMK469	659 ID	20	25	45	14	11/7/94	11/15/95	\$30	\$9.00
917635423 MD BMK469	659 ID	20	25	30	9	11/7/94	11/1/95		
917775714 DC 638948	650 CID	50	55	105	0	11/13/93	10/23/95		
917775714 DC 638948	650 CID	50	55	105	0	11/13/93	10/23/95		
917775714 DC 638948	650 ID	50	55	40	0	11/13/93	9/11/96	\$40	
917775714 DC 638948	650 ID	50	55	(105)	0	11/13/93	11/11/96		
917796460	811 OID	25	25	50	15	2/5/94	4/3/97		
917796460	811 OID	25	25	50	15	2/5/94	8/5/97	\$50	\$15.00
917993856 DC 264986	659 OID	50	55	105	32	11/23/94	1/2/96		
917993856 DC 264986	659 CID	50	55	105	32	11/23/94	7/17/97	\$105	\$31.50
918046113 VA UQD327	649 ID	20	25	45	14	12/3/93	10/25/95		
918046113 VA UQD327	649 ID	20	25	45	14	12/3/93	1/24/96	\$45	\$13.50
918135131 DC 373733	651 CID	50	55	105	32	3/23/94	5/14/96		
918135131 DC 373733	651 CID	50	55	105	32	3/23/94	4/25/97	\$105	\$31.50
918135131 DC 373733	651 CID	50	55	105	32	3/23/94	4/25/97	\$105	\$31.50
918231856 DC 677438	661 CID	20	25	45	18	1/28/95	7/10/96		
918231856 DC 677438	661 CID	20	25	45	18	1/28/95	5/22/97	\$45	\$17.91
918708803 DC 618254	660 CID	20	25	25	10	8/26/94	6/5/96		
918708803 DC 618254	660 CID	20	25	25	10	8/26/94	5/22/97	\$5	\$1.99
918711231 VA NRI412	666 ID	20	25	45	18	6/21/95	1/30/96		
918711231 VA NRI412	666 ID	20	25	45	18	6/21/95	1/30/96	\$45	\$17.91

924174635 PA ADE0011	665 ID	50	55	105	42	7/9/95	1/3/96		
924174635 PA ADE0011	665 ID	50	55	105	42	7/9/95	1/3/96	\$105	\$41.79
924196556 MD TKJ758	671 ID	25	30	55	22	12/6/95	5/31/96		
924196556 MD TKJ758	671 ID	25	30	55	22	12/6/95	6/11/96	\$55	\$21.89
924199426 NY M4S886	665 ID	20	25	40	16	7/8/95	11/15/95		
924199426 NY M4S886	665 ID	20	25	45	18	7/8/95	12/5/95	\$40	\$15.92
924203000 MD CBP749	669 ID	100	105	205	82	9/16/95	3/19/96		
924203000 MD CBP749	669 ID	100	105	205	82	9/16/95	4/29/96	\$205	\$81.59
924206695 DC 715168	667 CID	50	55	55	22	7/28/95	1/16/96		
924206695 DC 715168	667 ID	50	55	55	22	7/28/95	3/8/96	\$5	\$1.99
924211912 NJ FL460H	665 OID	20	25	45	18	7/2/95	4/24/96		
924211912 NJ FL460H	665 ID	20	25	45	18	7/2/95	4/19/96	\$45	\$17.91
924217976 MD NSD487	666 ID	50	55	105	42	7/1/95	12/20/95		
924217976 MD NSD487	666 ID	50	55	105	42	7/1/95	1/22/96	\$105	\$41.79
924393363 DC 265376	671 ID	10	15	25	10	11/11/95	12/5/96		
924393363 DC 265376	671 ID	10	15	165	66	11/11/95	12/6/96	\$165	\$65.67
924446515 DC 683658	673 CID	50	55	105	42	1/29/96	8/1/96		
924446515 DC 683658	673 CID	50	55	105	42	1/29/96	7/22/97	\$105	\$41.79
924458511 DC 526324	675 CID	50	55	105	42	3/21/96	12/2/96		
924458511 DC 526324	675 CID	50	55	105	42	3/21/96	12/2/96	\$105	\$41.79
924475171	829 ID	50	50	100	40	10/1/95	3/12/96		
924475171	829 ID	50	50	100	40	10/1/95	3/20/96	\$100	\$39.80
924541564 MD BVJ749	671 ID	20	25	20	8	11/16/95	5/17/96		
924541564 MD BVJ749	671 ID	20	25	45	18	11/16/95	7/22/96	\$20	\$7.96
924560125 DC 355056	673 CID	20	25	25	0	1/28/96	6/18/96		
924560125 DC 355056	673 ID	20	25	25	10	1/28/96	7/15/96	\$5	\$1.99
924647231 MD CCS994	674 ID	50	55	105	42	2/8/96	4/9/97		
924647231 MD CCS994	674 ID	50	55	105	42	2/8/96	5/1/97	\$105	\$41.79
924654150 MD CBA035	671 ID	20	25	45	18	9/15/95	6/27/96	\$45	\$17.91
924654150 MD CBA035	671 ID	20	25	45	18	9/15/95	6/7/96		
924665556 DC 611870	669 OID	20	25	45	18	9/10/95	7/1/96		
924665556 DC 611870	669 CID	20	25	45	18	9/10/95	4/23/97	\$45	\$17.91
924703873	823 OID	150	150	300	119	4/1/95	10/13/95		
924703873	823 ID	150	150	150	0	4/1/95	5/13/97	\$150	
924704465 DC 751338	674 ID	20	25	25	0	1/30/96	7/22/96		
924704465 DC 751338	674 CID	20	25	25	0	1/30/96	8/7/97		
924704465 DC 751338	674 CID	20	25	25	0	1/30/96	8/7/97	\$30	
924781314 DC 679788	662 ID	20	25	45	18	2/19/95	12/11/95		
924781314 DC 679788	662 ID	20	25	45	18	2/19/95	12/6/95	\$45	\$17.91
924835133 PA ASH4206	666 ID	20	25	45	18	8/10/95	1/16/96		
924835133 PA ASH4206	666 ID	20	25	45	18	8/10/95	2/5/96	\$45	\$17.91
924849715 VA RAB6268	669 ID	50	55	105	42	10/2/95	3/25/96		
924849715 VA RAB6268	669 ID	50	55	105	42	10/2/95	4/22/96	\$105	\$41.79
924895554 MD 662552M	664 ID	20	25	45	18	4/30/95	12/5/95		
924895554 MD 662552M	664 ID	20	25	40	16	4/30/95	5/6/96	\$40	\$15.92
924896943	824 ID	25	25	50	20	5/17/95	12/21/95		
924896943	824 ID	25	25	50	20	5/17/95	12/21/95	\$50	\$19.90

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799955671 DC 802408	681 ID	15	20	35	0	8/28/96	2/11/97		
799955671 DC 802408	681 ID	15	20	35	14	8/28/96	3/14/97	\$35	\$13.93
799968562 VA KYO106	681 ID	15	20	20	8	8/28/96	3/20/97		
799968562 VA KYO106	681 ID	15	20	20	8	8/28/96	4/11/97	\$5	\$1.99
799987650 CO UVL985	680 ID	20	25	25	10	9/4/96	4/10/97		
799987650 CO UVL985	680 ID	20	25	25	10	9/4/96	4/10/97	\$5	\$1.99
799994204 DC 805369	681 O/D	50	55	105	42	8/29/96	5/12/97		
799994204 DC 805369	681 O/D	50	55	105	42	8/29/96	5/12/97	\$105	\$41.79
800008075 MD 261AYX	681 ID	15	20	20	8	8/30/96	3/28/97		
800008075 MD 261AYX	681 ID	15	20	20	8	8/30/96	3/27/97	\$5	\$1.99
800013012 MD CJW581	681 ID	15	20	35	14	9/4/96	3/19/97		
800013012 MD CJW581	681 ID	15	20	35	14	9/4/96	4/18/97	\$35	\$13.93
800013233 VA WOV633	681 ID	50	55	105	42	9/4/96	4/28/97	\$105	\$41.79
800013233 VA WOV633	681 ID	50	55	105	42	9/4/96	4/25/97		
800015145 MA 5649AC	679 ID	50	55	105	42	9/2/96	3/7/97		
800015145 MA 5649AC	679 ID	50	55	50	20	9/2/96	3/12/97	\$50	\$19.90
800019916 VA ZUZ8194	681 ID	50	55	105	42	9/3/96	4/28/97		
800019916 VA ZUZ8194	681 ID	50	55	105	42	9/3/96	5/2/97	\$105	\$41.79
800021224 VA ZLU3071	681 ID	20	25	25	10	9/3/96	3/24/97		
800021224 VA ZLU3071	681 ID	20	25	25	10	9/3/96	4/4/97	\$5	\$1.99
800024212 MD 782855M	681 ID	50	55	100	0	9/4/96	2/6/97		
800024212 MD 782855M	681 ID	50	55	105	42	9/4/96	3/3/97	\$100	\$39.80
800024212 MD 782855M	681 ID	50	55	105	42	9/4/96	4/21/97	\$105	\$41.79
800028666 MD 900715	681 ID	20	25	45	18	9/10/96	2/20/97		
800028666 MD 900715	681 ID	20	25	45	18	9/10/96	3/24/97	\$45	\$17.91
800032951 NY J404HR	679 ID	15	20	35	14	9/4/96	7/22/97		
800032951 NY J404HR	679 ID	15	20	15	6	9/4/96	7/22/97	\$15	\$5.97
800046295 MD 96D283	681 ID	50	55	105	42	9/17/96	3/12/97		
800046295 MD 96D283	681 ID	50	55	105	42	9/17/96	3/12/97	\$105	\$41.79
800053483 MD 96D283	681 ID	50	55	105	42	9/13/96	3/12/97		
800053483 MD 96D283	681 ID	50	55	105	42	9/13/96	3/12/97	\$105	\$41.79
800053914 MD 96D283	681 ID	50	55	105	42	9/13/96	3/12/97		
800053914 MD 96D283	681 ID	50	55	105	42	9/13/96	3/12/97	\$105	\$41.79
800074494 VA AAC2165	681 ID	15	20	35	14	9/10/96	3/7/97		
800074494 VA AAC2165	681 ID	15	20	30	12	9/10/96	4/29/97	\$30	\$11.94
800080665 NY A840YL	680 ID	20	25	40	0	9/11/96	1/16/97		
800080665 NY A840YL	680 ID	20	25	45	18	9/11/96	2/10/97	\$45	\$17.91
800103721 DC 784697	682 TID	20	25	45	0	10/1/96	5/19/97		
800103721 DC 784697	682 ID	20	25	45	18	10/1/96	5/20/97	\$45	\$17.91
800105386 DC 972828	682 ID	20	25	45	18	10/1/96	3/25/97		
800105386 DC 972828	682 ID	20	25	45	18	10/1/96	3/31/97	\$45	\$17.91
800125664 DC 201158	682 ID	50	55	105	42	10/4/96	3/21/97		
800125664 DC 201158	682 ID	50	55	105	42	10/4/96	4/23/97	\$105	\$41.79
800136890 VA KDQ677	682 ID	15	20	35	14	10/2/96	4/7/97		
800136890 VA KDQ677	682 ID	15	20	35	14	10/2/96	5/5/97	\$35	\$13.93

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800154191 VA RODILAN	682 ID	15	20	20	8	10/7/96	4/7/97		
800154191 VA RODILAN	682 ID	15	20	20	8	10/7/96	5/5/97	\$5	\$1.99
800173485 TX SGX20T	679 ID	20	25	20	8	8/30/96	2/18/97		
800173485 TX SGX20T	679 ID	20	25	45	18	8/30/96	2/19/97		
800173485 TX SGX20T	679 ID	20	25	45	18	8/30/96	3/7/97	\$45	\$17.91
800184140 MD BDA914	681 ID	15	20	35	14	8/31/96	3/10/97		
800184140 MD BDA914	681 ID	15	20	35	14	8/31/96	5/19/97	\$35	\$13.93
800211484 DC 527628	681 ID	15	20	35	14	9/18/96	5/12/97		
800211484 DC 527628	681 ID	15	20	35	14	9/18/96	5/12/97	\$35	\$13.93
800225075 DC 789011	681 OID	15	20	30	12	9/5/96	4/1/97		
800225075 DC 789011	681 TID	15	20	30	0	9/5/96	8/8/97	\$25	\$9.95
800244734 VA ZKW6918	684 ID	15	20	35	14	9/27/96	7/29/97		
800244734 VA ZKW6918	684 ID	15	20	35	14	9/27/96	8/18/97	\$35	\$13.93
800251082 MD CMT146	682 ID	20	25	25	10	10/3/96	4/21/97	\$5	\$1.99
800251082 MD CMT146	682 ID	20	25	25	10	10/3/96	4/3/97		
800272616 LA CYT661	679 ID	50	55	100	40	9/3/96	12/23/96	\$100	\$39.80
800272616 LA CYT661	679 ID	50	55	105	42	9/3/96	4/8/97		
800287320 DC 797736	681 ID	20	25	40	16	9/5/96	3/31/97		
800287320 DC 797736	681 ID	20	25	45	18	9/5/96	4/29/97	\$40	\$15.92
800306544 CT 680KTL	681 TID	20	25	45	0	9/20/96	5/19/97		
800306544 CT 680KTL	681 ID	20	25	45	18	9/20/96	5/19/97	\$45	\$17.91
800319170 DC B35882	682 ID	50	55	105	42	10/2/96	4/23/97		
800319170 DC B35882	682 ID	50	55	105	42	10/2/96	4/24/97	\$105	\$41.79
800324092 DC 324300	682 ID	20	25	25	10	10/7/96	7/8/97		
800324092 DC 324300	682 CID	20	25	45	18	10/7/96	8/7/97		
800324092 DC 324300	682 CID	20	25	45	18	10/7/96	8/7/97	\$45	\$17.91
800329972 DC 690375	682 ID	15	20	35	14	10/2/96	3/21/97		
800329972 DC 690375	682 ID	15	20	35	14	10/2/96	6/30/97	\$35	\$13.93
800344300 MD BXW059	682 ID	20	25	25	10	10/2/96	4/23/97		
800344300 MD BXW059	682 ID	20	25	25	10	10/2/96	5/23/97	\$5	\$1.99
800358613 VA ZLD9827	682 ID	15	20	35	14	9/20/96	4/8/97		
800358613 VA ZLD9827	682 ID	15	20	35	14	9/20/96	5/19/97	\$35	\$13.93
800368903 TX NPB47P	680 ID	15	20	35	14	9/21/96	3/5/97		
800368903 TX NPB47P	680 ID	15	20	35	14	9/21/96	4/3/97	\$35	\$13.93
800372156 DC 654927	682 ID	50	55	105	42	9/24/96	4/14/97	\$105	\$41.79
800372156 DC 654927	682 BID	50	55	105	0	9/24/96	4/1/97		
800376205 DC 737253	682 ID	50	55	105	0	9/25/96	3/17/97		
800376205 DC 737253	682 CID	50	55	105	42	9/25/96	5/23/97	\$105	\$41.79
800382203 NJ ERU57A	680 ID	20	25	40	0	9/26/96	1/13/97		
800382203 NJ ERU57A	680 ID	20	25	45	18	9/26/96	4/21/97	\$40	\$15.92
800394943 MD 848618M	682 ID	15	20	35	14	9/26/96	3/20/97		
800394943 MD 848618M	682 ID	15	20	35	14	9/26/96	5/5/97	\$35	\$13.93
800406946 VA ZKU1494	681 ID	50	55	100	40	9/5/96	4/18/97		
800406946 VA ZKU1494	681 ID	50	55	105	42	9/5/96	8/4/97	\$100	\$39.80
800426992 MD CHW918	682 ID	15	20	20	8	9/20/96	4/18/97		
800426992 MD CHW918	682 ID	15	20	20	8	9/20/96	4/2/97	\$5	\$1.99
800437702 VA ZLP7150	682 ID	15	20	30	12	9/23/96	3/28/97		
800437702 VA ZLP7150	682 ID	15	20	35	14	9/23/96	8/18/97	\$30	\$11.94

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799694243 MD CJW581	681 ID	15	20	35	14	8/29/96	3/19/97		
799694243 MD CJW581	681 ID	15	20	35	14	8/29/96	4/18/97	\$35	\$13.93
799701350 VA ZPU7717	681 ID	20	25	45	18	8/26/96	4/4/97		
799701350 VA ZPU7717	681 ID	20	25	45	18	8/26/96	5/2/97	\$45	\$17.91
799701873 MD WLX627	681 OID	15	20	35	14	8/26/96	8/20/97		
799701873 MD WLX627	681 ID	15	20	35	14	8/26/96	8/21/97	\$35	\$13.93
799710310 DC 810127	680 ID	20	25	45	18	8/20/96	2/26/97		
799710310 DC 810127	680 ID	20	25	45	18	8/20/96	8/11/97	\$45	\$17.91
799716573 VA ZMN2358	682 ID	15	20	35	14	9/20/96	7/18/97		
799716573 VA ZMN2358	682 ID	15	20	35	14	9/20/96	7/22/97	\$35	\$13.93
799717052 DC 778735	681 ID	50	55	105	42	9/3/96	8/19/97	\$105	\$41.79
799717052 DC 778735	681 TID	50	55	105	0	9/3/96	8/15/97		
799717074 DC 778735	681 TID	50	55	105	0	9/3/96	8/15/97		
799717074 DC 778735	681 ID	50	55	105	42	9/3/96	8/19/97	\$105	\$41.79
799789524 VA ZME3433	681 ID	50	55	105	42	8/29/96	4/15/97		
799789524 VA ZME3433	681 ID	50	55	105	42	8/29/96	5/19/97	\$105	\$41.79
799794995 MD DJR780	681 ID	15	20	35	14	8/28/96	5/5/97		
799794995 MD DJR780	681 ID	15	20	35	14	8/28/96	7/31/97	\$35	\$13.93
799796561 DC 654927	681 BID	20	25	45	0	8/26/96	4/1/97		
799796561 DC 654927	681 ID	20	25	45	18	8/26/96	4/14/97	\$45	\$17.91
799814610 VA ZLZ5961	681 ID	50	55	105	42	8/22/96	3/5/97		
799814610 VA ZLZ5961	681 ID	50	55	105	42	8/22/96	3/19/97	\$105	\$41.79
799826871 DC 797224	681 ID	50	55	55	22	8/28/96	3/27/97		
799826871 DC 797224	681 CID	50	55	55	22	8/28/96	5/20/97	\$5	\$1.99
799845395 DC 618031	681 ID	20	25	45	18	9/4/96	3/7/97		
799845395 DC 618031	681 ID	20	25	45	18	9/4/96	3/17/97	\$45	\$17.91
799852561 MD 871774M	681 ID	15	20	35	14	8/28/96	3/12/97		
799852561 MD 871774M	681 ID	15	20	35	14	8/28/96	4/9/97	\$35	\$13.93
799861893 VA ZMF2655	681 ID	15	20	35	0	8/24/96	2/11/97		
799861893 VA ZMF2655	681 ID	15	20	35	14	8/24/96	3/7/97	\$35	\$13.93
799865021 NJ JR179Y	679 ID	15	20	35	14	8/24/96	2/11/97		
799865021 NJ JR179Y	679 ID	15	20	35	14	8/24/96	2/24/97	\$35	\$13.93
799880270 VA ZPT3013	681 ID	50	55	105	42	8/22/96	5/12/97		
799880270 VA ZPT3013	681 ID	50	55	105	42	8/22/96	7/29/97	\$105	\$41.79
799894701 DC 687061	680 ID	20	25	40	0	8/20/96	1/13/97		
799894701 DC 687061	680 ID	20	25	45	18	8/20/96	2/11/97	\$40	\$15.92
799917016 VA ZKC1906	681 ID	20	25	45	18	8/23/96	5/5/97		
799917016 VA ZKC1906	681 ID	20	25	45	18	8/23/96	5/27/97	\$45	\$17.91
799917020 VA ZKC1906	681 ID	50	55	105	42	8/23/96	5/5/97		
799917020 VA ZKC1906	681 ID	50	55	105	42	8/23/96	5/27/97	\$105	\$41.79
799931355 ON 718RFK	679 ID	20	25	25	10	8/28/96	8/26/97		
799931355 ON 718RFK	679 ID	20	25	25	10	8/28/96	8/26/97	\$5	\$1.99
799932803 DC 810373	681 CID	20	25	45	18	8/26/96	7/29/97		
799932803 DC 810373	681 CID	20	25	45	18	8/26/96	7/29/97	\$45	\$17.91

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926853196 DC 581896	673 CID	20	25	45	18	1/16/96	11/30/96		
926853196 DC 581896	673 CID	20	25	45	18	1/16/96	11/30/96	\$45	\$17.91
926913680 VA ZNZ9620	673 ID	50	55	105	42	1/26/96	1/21/97		
926913680 VA ZNZ9620	673 ID	50	55	105	42	1/26/96	2/3/97	\$105	\$41.79
926918392 DC 696789	671 ID	20	25	45	18	11/5/95	7/3/96		
926918392 DC 696789	671 CID	20	25	45	18	11/5/95	9/16/96	\$45	\$17.91
926918775 VA RAB3478	670 ID	50	55	5	0	10/8/95	3/18/96		
926918775 VA RAB3478	670 ID	50	55	5	2	10/8/95	4/26/96	\$5	\$1.99
926918775 VA RAB3478	670 ID	50	55	100	40	10/8/95	7/26/96		
926966283 DC 200EHW	668 OID	20	25	45	18	8/31/95	2/14/97		
926966283 DC 200EHW	668 CID	20	25	45	18	8/31/95	6/26/97	\$45	\$17.91
926969643 NJ FTC56P	678 ID	20	25	45	18	10/21/95	12/30/96		
926969643 NJ FTC56P	678 ID	20	25	45	18	10/21/95	1/9/97	\$45	\$17.91
926991811 VA 2165WD	668 BID	20	25	45	0	9/4/95	1/26/96		
926991811 VA 2165WD	668 ID	20	25	40	16	9/4/95	2/29/96	\$40	\$15.92
926998623	827 OID	25	25	50	0	8/13/95	12/12/95		
926998623	827 ID	25	0	25	0	8/13/95	8/22/95	\$25	
927016963 MA 897MAS	666 ID	20	25	45	18	8/12/95	12/27/95		
927016963 MA 897MAS	666 ID	20	25	40	16	8/12/95	1/16/96	\$40	\$15.92
927020102 MI CTW740	673 ID	20	25	45	18	1/22/96	10/15/96		
927020102 MI CTW740	673 ID	20	25	45	18	1/22/96	10/23/96	\$45	\$17.91
927029751 DC 526324	671 CID	20	25	45	18	12/6/95	12/2/96		
927029751 DC 526324	671 CID	20	25	45	18	12/6/95	12/2/96	\$45	\$17.91
927048824	831 ID	25	25	50	20	11/27/95	5/1/96		
927048824	831 ID	25	25	25	10	11/27/95	6/27/96	\$25	\$9.95
927073243	828 ID	15	15	30	12	9/18/95	1/30/96		
927073243	828 ID	15	15	30	12	9/18/95	1/24/96	\$30	\$11.94
927094350 DC 97948	670 OID	50	55	105	42	10/25/95	9/5/96		
927094350 DC 97948	670 CID	50	55	105	42	10/25/95	7/17/97	\$105	\$41.79
927109256 MD BYT300	680 ID	50	55	105	42	10/25/95	4/4/97		
927109256 MD BYT300	680 ID	50	55	105	42	10/25/95	4/18/97	\$105	\$41.79
927113692 DC FDMAGC	674 ID	20	25	45	18	2/12/96	12/13/96		
927113692 DC FDMAGC	674 ID	20	25	45	18	2/12/96	8/1/97	\$45	\$17.91
927124122 DC 742530	672 CID	50	55	105	42	1/3/96	7/11/96		
927124122 DC 742530	672 ID	50	55	105	42	1/3/96	8/6/96	\$105	\$41.79
927141165	833 OID	988	988	988	0	1/30/96	5/6/97	\$988	
927141165	833 OID	988	988	988	0	1/30/96	5/5/97		
927174710 DC 755104	669 ID	50	55	105	0	9/14/95	2/14/96		
927174710 DC 755104	669 ID	50	55	105	42	9/14/95	3/5/96	\$105	\$41.79
927176880 DC 41223	673 CID	20	25	45	18	1/4/96	7/18/96		
927176880 DC 41223	673 CID	20	25	45	18	1/4/96	7/28/97	\$45	\$17.91
927204655 DC 562379	670 ID	50	55	105	42	10/10/95	5/30/96		
927204655 DC 562379	670 CID	50	55	105	42	10/10/95	6/27/97	\$105	\$41.79
927216706 MD CFY993	670 ID	50	55	105	42	10/20/95	5/13/96		
927216706 MD CFY993	670 ID	50	55	105	42	10/20/95	6/11/96	\$105	\$41.79
927218504 DC 562379	670 ID	20	25	45	18	10/12/95	5/30/96		
927218504 DC 562379	670 CID	20	25	45	18	10/12/95	6/27/97	\$45	\$17.91

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927680600 DC 535069	672 ID	50	55	105	42	12/12/95	6/3/96		
927680600 DC 535069	672 ID	50	55	105	42	12/12/95	7/1/96	\$105	\$41.79
927813515 MD XVK817	671 ID	20	25	45	18	11/29/95	7/8/96		
927813515 MD XVK817	671 ID	20	25	45	18	11/29/95	8/19/96	\$45	\$17.91
927818791 MD ALY427	672 ID	15	20	35	14	12/14/95	5/21/97		
927818791 MD ALY427	672 ID	15	20	15	6	12/14/95	5/21/97	\$15	\$5.97
927827821 DC 758029	674 ID	20	25	45	0	2/27/96	7/17/96		
927827821 DC 758029	674 CID	20	25	45	18	2/27/96	9/6/96	\$45	\$17.91
927828565 MD ADT362	674 ID	15	20	30	0	2/13/96	7/17/96		
927828565 MD ADT362	674 ID	15	20	35	14	2/13/96	10/9/96	\$30	\$11.94
927837223 VA NYBILLS	674 ID	20	25	25	0	2/29/96	7/17/96		
927837223 VA NYBILLS	674 ID	20	25	25	0	2/29/96	7/19/96	\$5	
927839732 MD ADT362	674 ID	15	20	30	0	3/4/96	7/17/96		
927839732 MD ADT362	674 ID	15	20	35	14	3/4/96	10/9/96	\$30	\$11.94
927846500 DC 765018	675 CID	50	55	105	42	3/10/96	12/2/96		
927846500 DC 765018	675 CID	50	55	105	42	3/10/96	12/2/96	\$105	\$41.79
927872175 DC 642785	676 ID	25	30	30	12	4/10/96	11/15/96	\$30	\$11.94
927872175 DC 642785	676 CID	25	30	30	12	4/10/96	10/24/96		
927875362 MD DAP602	674 ID	20	25	45	18	2/25/96	12/6/96		
927875362 MD DAP602	674 ID	20	25	45	18	2/25/96	1/9/97	\$45	\$17.91
927875384 DC 765018	674 CID	20	25	45	18	2/26/96	12/2/96		
927875384 DC 765018	674 CID	20	25	45	18	2/26/96	12/2/96	\$45	\$17.91
927880461 DC 767893	671 CID	50	55	105	42	11/23/95	12/2/96		
927880461 DC 767893	671 CID	50	55	105	42	11/23/95	12/2/96	\$205	\$81.59
927904471 DC 768198	673 CID	100	105	205	82	1/7/96	12/2/96		
927904471 DC 768198	673 CID	100	105	205	82	1/7/96	12/2/96	\$205	\$81.59
927947812 FL PFA76T	674 ID	50	55	100	0	3/15/96	6/14/96		
927947812 FL PFA76T	674 ID	50	55	105	42	3/15/96	8/19/96	\$100	\$39.80
927948022	834 ID	50	50	100	0	2/24/96	6/19/96		
927948022	834 ID	50	50	100	40	2/24/96	8/20/96	\$100	\$39.80
927994406 NJ FR390H	675 ID	50	55	105	42	5/6/96	9/27/96		
927994406 NJ FR390H	675 ID	50	55	105	42	5/6/96	10/3/96	\$105	\$41.79
928005142 DC 811547	686 CID	15	20	35	14	1/25/97	7/29/97		
928005142 DC 811547	686 CID	15	20	35	14	1/25/97	7/29/97	\$35	\$13.93
928009121	834 ID	25	25	25	10	3/5/96	10/15/96	\$25	\$9.95
928009121	834 OID	25	25	50	20	3/5/96	10/11/96		
928053081 NJ CHT94M	676 ID	15	20	30	0	5/25/96	9/5/96		
928053081 NJ CHT94M	676 ID	15	20	35	14	5/25/96	10/7/96	\$30	\$11.94
928092152	845 ID	25	25	50	0	1/24/97	5/12/97		
928092152	845 ID	25	25	50	20	1/24/97	7/9/97	\$50	\$19.90
928106244 CT 211KLK	680 ID	25	30	55	22	1/22/96	4/21/97		
928106244 CT 211KLK	680 ID	25	30	55	22	1/22/96	4/25/97	\$55	\$21.89
928120432 WI HRU660	670 ID	20	25	40	0	11/26/95	3/15/96		
928120432 WI HRU660	670 ID	20	25	45	18	11/26/95	4/17/96	\$45	\$17.91
928126172 MD YTL890	673 ID	20	25	45	18	1/13/96	8/16/96		
928126172 MD YTL890	673 ID	20	25	45	18	1/13/96	9/9/96	\$45	\$17.91
928179630 MD BRN303	675 ID	20	25	45	0	3/30/96	8/22/96		
928179630 MD BRN303	675 ID	20	25	45	18	3/30/96	1/17/97	\$45	\$17.91

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928928976 DC 998975	677 CID	25	30	55	22	5/16/96	12/2/96		
928928976 DC 998975	677 CID	25	30	55	22	5/16/96	12/2/96	\$55	\$21.89
928974056 MD VEP446	673 ID	20	25	45	18	1/30/96	10/7/96		
928974056 MD VEP446	673 ID	20	25	45	18	1/30/96	10/7/96	\$45	\$17.91
929003261 MD CSJ663	675 ID	15	20	20	8	3/7/96	11/15/96		
929003261 MD CSJ663	675 ID	15	20	20	8	3/7/96	11/6/96	\$5	\$1.99
929009863 DC 421317	675 CID	15	20	35	14	3/28/96	12/2/96		
929009863 DC 421317	675 CID	15	20	35	14	3/28/96	12/2/96	\$35	\$13.93
929016045 NJ LE333N	675 ID	20	25	45	18	4/20/96	9/16/96		
929016045 NJ LE333N	675 ID	20	25	45	18	4/20/96	10/18/96	\$45	\$17.91
929024876 FL KEG05U	675 ID	15	20	20	8	5/10/96	12/5/96		
929024876 FL KEG05U	675 ID	15	20	20	8	5/10/96	10/15/96	\$5	\$1.99
929060193 TX JS2221	673 ID	20	25	25	10	3/3/96	9/4/96		
929060193 TX JS2221	673 ID	20	25	25	10	3/3/96	9/10/96	\$5	\$1.99
929063413	834 ID	50	50	100	40	2/24/96	7/9/96		
929063413	834 ID	50	50	100	40	2/24/96	7/18/96	\$100	\$39.80
929063564 DC 564234	674 CID	50	55	55	22	2/27/96	9/6/96		
929063564 DC 564234	674 ID	50	55	100	40	2/27/96	11/20/96	\$45	\$17.91
929073143 DC 290404	674 OID	50	55	105	42	3/1/96	5/2/97		
929073143 DC 290404	674 CID	50	55	105	42	3/1/96	7/18/97	\$105	\$41.79
929080714	835 ID	75	75	100	40	4/12/96	2/7/97		
929080714	835 OID	75	75	50	20	4/12/96	3/18/97		
929080714	835 OID	75	75	50	20	4/12/96	3/26/97	\$50	\$19.90
929167735 MA 611BJK	674 ID	50	55	100	0	3/17/96	6/14/96		
929167735 MA 611BJK	674 ID	50	55	55	22	3/17/96	8/19/96	\$45	\$17.91
929183662 MD 786124M	676 ID	50	55	105	42	3/29/96	11/20/96	\$105	\$41.79
929183662 MD 786124M	676 ID	50	55	105	42	3/29/96	10/9/96		
929184480 DC 771463	675 CID	20	25	45	18	3/10/96	12/2/96		
929184480 DC 771463	675 CID	20	25	45	18	3/10/96	12/2/96	\$45	\$17.91
929184491 DC 771463	675 CID	50	55	105	42	3/10/96	12/2/96		
929184491 DC 771463	675 CID	50	55	105	42	3/10/96	12/2/96	\$105	\$41.79
929207694 MD DGB146	679 ID	50	55	105	0	7/16/96	1/6/97		
929207694 MD DGB146	679 ID	50	55	50	0	7/16/96	1/6/97	\$50	
929214355 DC 383961	681 CID	50	55	105	42	9/5/96	7/29/97		
929214355 DC 383961	681 CID	50	55	105	42	9/5/96	7/29/97	\$105	\$41.79
929276110 NJ KV711S	671 ID	50	55	105	42	1/1/96	5/24/96		
929276110 NJ KV711S	671 ID	50	55	105	42	1/1/96	6/24/96	\$105	\$41.79
929287472 DC 544575	672 ID	20	25	45	18	12/10/95	8/2/96		
929287472 DC 544575	672 ID	20	25	45	18	12/10/95	8/16/96	\$45	\$17.91
929312543 MA 870ZXR	675 ID	20	25	25	10	4/22/96	9/12/96		
929312543 MA 870ZXR	675 ID	20	25	25	10	4/22/96	9/23/96	\$5	\$1.99
929343531 DC 762660	676 ID	20	25	45	18	4/5/96	8/20/97		
929343531 DC 762660	676 OID	20	25	45	18	4/5/96	8/25/97	\$45	\$17.91
929351113 MD DAP602	677 ID	100	105	205	82	5/2/96	12/6/96		
929351113 MD DAP602	677 ID	100	105	205	82	5/2/96	1/10/97	\$205	\$81.59

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929353795 DC 793230	677 ID	50	55	105	42	5/11/96	2/5/97		
929353795 DC 793230	677 CID	50	55	105	42	5/11/96	4/18/97	\$105	\$41.79
929471922 MD BXJ156	679 ID	50	55	105	42	6/15/96	2/3/97		
929471922 MD BXJ156	679 ID	50	55	105	42	6/15/96	3/27/97	\$105	\$41.79
929491931 DC 799226	680 CID	50	55	105	42	8/5/96	4/25/97		
929491931 DC 799226	680 CID	50	55	105	42	8/5/96	4/25/97	\$105	\$41.79
929517713 MD BRM856	679 ID	20	25	45	18	7/19/96	2/14/97		
929517713 MD BRM856	679 ID	20	25	45	18	7/19/96	2/14/97	\$45	\$17.91
929530361 VA ZNG9579	679 ID	50	55	105	42	6/16/96	4/15/97		
929530361 VA ZNG9579	679 ID	50	55	105	42	6/16/96	4/21/97	\$105	\$41.79
929538746 MD 65895	681 ID	50	55	90	36	8/24/96	8/19/97	\$90	\$35.82
929538746 MD 65895	681 ID	50	55	105	42	8/24/96	8/19/97		
929554043 VA ZLC7401	678 TID	20	25	25	0	6/11/96	12/18/96		
929554043 VA ZLC7401	678 ID	20	25	25	10	6/11/96	2/13/97	\$5	\$1.99
929602752	839 ID	75	75	150	60	7/20/96	1/7/97		
929602752	839 ID	75	75	150	60	7/20/96	1/6/97	\$150	\$59.70
929602763	839 ID	10	10	20	8	7/20/96	1/6/97		
929602763	839 ID	10	10	20	8	7/20/96	1/7/97	\$20	\$7.96
929608864	839 ID	50	50	100	0	7/28/96	11/12/96		
929608864	839 ID	50	50	100	40	7/28/96	12/31/96	\$100	\$39.80
929634090	839 ID	25	25	50	20	7/30/96	1/3/97		
929634090	839 ID	25	25	25	10	7/30/96	5/23/97	\$25	\$9.95
929644295 DC 775649	682 ID	50	55	100	40	10/7/96	4/7/97		
929644295 DC 775649	682 ID	50	55	105	42	10/7/96	5/14/97	\$100	\$39.80
929646734 MD CHJ374	680 ID	20	25	40	0	7/30/96	2/13/97	\$40	
929646734 MD CHJ374	680 ID	20	25	45	0	7/30/96	2/13/97		
929689935 MA 62446	676 ID	50	55	105	42	5/9/96	11/26/96		
929689935 MA 62446	676 ID	50	55	105	42	5/9/96	2/24/97	\$105	\$41.79
929693052 MD DAP602	676 ID	20	25	45	18	4/8/96	12/6/96		
929693052 MD DAP602	676 ID	20	25	45	18	4/8/96	1/9/97	\$45	\$17.91
929714531 DC 794725	677 CID	20	25	45	18	5/9/96	4/25/97		
929714531 DC 794725	677 CID	20	25	45	18	5/9/96	4/25/97	\$45	\$17.91
929752806	842 ID	50	50	100	40	10/18/96	3/7/97		
929752806	842 ID	50	50	100	40	10/18/96	5/7/97	\$100	\$39.80
929829250	837 ID	75	75	150	60	5/21/96	11/14/96		
929829250	837 CID	75	75	150	60	5/21/96	11/18/96	\$150	\$59.70
929830731 NJ HTT66A	676 ID	20	25	45	18	6/2/96	4/3/97		
929830731 NJ HTT66A	676 ID	20	25	45	18	6/2/96	10/31/96	\$45	\$17.91
929840520 MA 385ZOY	678 ID	50	55	105	42	7/4/96	12/31/96		
929840520 MA 385ZOY	678 ID	50	55	105	42	7/4/96	3/7/97	\$105	\$41.79
929904791 VA ZJK3834	685 ID	50	55	105	42	12/12/96	7/28/97		
929904791 VA ZJK3834	685 ID	50	55	105	42	12/12/96	8/12/97	\$105	\$41.79
929967371 DC 808026	685 ID	20	25	45	18	1/20/97	7/7/97		
929967371 DC 808026	685 ID	20	25	45	18	1/20/97	8/5/97	\$45	\$17.91
930082160 PA AAN2094	678 ID	20	25	45	18	7/5/96	11/26/96		
930082160 PA AAN2094	678 ID	20	25	40	16	7/5/96	4/24/97	\$40	\$15.92

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930757586 DC 764473	679 ID	25	30	55	22	7/6/96	2/10/97		
930757586 DC 764473	679 ID	25	30	55	22	7/6/96	3/5/97	\$55	\$21.89
930804523	835 ID	25	25	50	0	3/24/96	7/28/97		
930804523	835 OID	25	25	50	0	3/24/96	7/25/97	\$50	
930835452 NY VH462	675 ID	20	25	45	18	4/26/96	12/23/96	\$45	\$17.91
930835452 NY VH462	675 OID	20	25	45	18	4/26/96	10/2/96		
930842006 DC 730801	677 ID	20	25	45	18	5/9/96	12/24/96	\$45	\$17.91
930842006 DC 730801	677 ID	20	25	45	18	5/9/96	12/18/96		
930842006 DC 730801	677 ID	20	25	45	18	5/9/96	1/16/97	\$45	\$17.91
930844740 FL KCC37M	674 ID	25	30	55	22	3/27/96	4/8/97		
930844740 FL KCC37M	674 ID	25	30	25	10	3/27/96	4/28/97	\$25	\$9.95
930845215 DC 743204	676 ID	20	25	45	18	4/13/96	11/27/96		
930845215 DC 743204	676 ID	20	25	45	18	4/13/96	12/3/96	\$45	\$17.91
931024430 VA ZML2328	681 ID	25	30	55	22	9/1/96	3/18/97		
931024430 VA ZML2328	681 ID	25	30	55	22	9/1/96	3/31/97	\$55	\$21.89
931024430 VA ZML2328	681 ID	25	30	55	22	9/1/96	3/31/98	\$55	\$21.89
931148702 MD DAP602	676 ID	100	105	205	82	4/6/96	12/6/96		
931148702 MD DAP602	676 ID	100	105	205	82	4/6/96	1/9/97	\$205	\$81.59
931154696	834 ID	25	25	50	20	3/5/96	7/30/96		
931154696	834 OID	25	25	50	20	3/5/96	8/5/96	\$50	\$19.90
931167543 VA ZTL5093	678 ID	20	25	45	18	6/3/96	12/18/96		
931167543 VA ZTL5093	678 ID	20	25	45	18	6/3/96	4/16/97	\$45	\$17.91
931174274	839 ID	25	25	50	20	7/21/96	1/17/97		
931174274	839 ID	25	25	50	20	7/21/96	2/7/97	\$50	\$19.90
931196755 VA ZVR3105	676 ID	25	30	30	0	4/5/96	9/16/96		
931196755 VA ZVR3105	676 ID	25	30	30	12	4/5/96	10/21/96	\$30	\$11.94
931196814	835 ID	25	25	50	20	4/8/96	8/21/96		
931196814	835 ID	25	25	50	20	4/8/96	9/3/96	\$50	\$19.90
931205866 DC 527628	677 ID	20	25	45	18	5/4/96	3/3/97		
931205866 DC 527628	677 ID	20	25	45	18	5/4/96	5/12/97	\$45	\$17.91
931285191 MD 92B498	676 ID	25	30	55	22	4/22/96	11/18/96		
931285191 MD 92B498	676 ID	25	30	55	22	4/22/96	12/4/96	\$55	\$21.89
931297544 DC 743204	677 ID	20	25	45	18	5/12/96	11/27/96		
931297544 DC 743204	677 ID	20	25	45	18	5/12/96	12/3/96	\$45	\$17.91
931374651 NY F643SA	674 ID	20	25	25	10	4/17/96	9/20/96		
931374651 NY F643SA	674 ID	20	25	25	10	4/17/96	10/1/96	\$5	\$1.99
931379396	839 OID	25	25	50	20	7/25/96	1/3/97		
931379396	839 ID	25	25	50	20	7/25/96	1/6/97	\$50	\$19.90
931391296 MA 167XPA	674 ID	20	25	45	18	3/26/96	9/3/96		
931391296 MA 167XPA	674 ID	20	25	40	16	3/26/96	9/3/96	\$40	\$15.92
931409706 FL SID45U	673 ID	20	25	45	18	3/13/96	7/5/96		
931409706 FL SID45U	673 ID	20	25	40	16	3/13/96	8/29/96	\$40	\$15.92
931423415 DC 792526	679 ID	50	55	105	42	7/20/96	2/14/97		
931423415 DC 792526	679 ID	50	55	105	42	7/20/96	4/18/97	\$105	\$41.79
931451091 MD CWP732	679 ID	20	25	40	0	7/14/96	12/9/96		
931451091 MD CWP732	679 ID	20	25	45	18	7/14/96	1/9/97	\$40	\$15.92
931461720	838 ID	25	25	50	20	6/16/96	11/27/96		
931461720	838 ID	25	25	50	20	6/16/96	11/27/96	\$50	\$19.90

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931467541 DC 764473	679 ID	20	25	45	18	7/22/96	2/10/97		
931467541 DC 764473	679 ID	20	25	45	18	7/22/96	3/5/97	\$45	\$17.91
931477993 VA ZTZ4496	680 ID	20	25	45	0	7/21/96	1/13/97		
931477993 VA ZTZ4496	680 ID	20	25	45	18	7/21/96	2/24/97	\$45	\$17.91
931477993 VA ZTZ4496	680 ID	20	25	40	16	7/21/96	5/19/97	\$40	\$15.92
931484050 VA H59419	679 ID	20	25	45	18	7/7/96	3/10/97		
931484050 VA H59419	679 ID	20	25	45	18	7/7/96	3/10/97	\$45	\$17.91
931484050 VA H59419	679 ID	20	25	45	18	7/7/96	3/24/97	\$45	\$17.91
931502692 DC 741176	680 ID	20	25	45	18	8/21/96	2/11/97		
931502692 DC 741176	680 ID	20	25	45	18	8/21/96	3/10/97	\$45	\$17.91
931522502 VA ZMF7649	681 ID	50	55	105	42	8/26/96	4/14/97		
931522502 VA ZMF7649	681 ID	50	55	105	42	8/26/96	5/15/97	\$105	\$41.79
931609534 MD 632508M	687 ID	50	55	105	0	3/7/97	8/12/97		
931609534 MD 632508M	687 ID	50	55	100	40	3/7/97	8/26/97	\$100	\$39.80
931662771 VA QKW835	684 ID	20	25	45	18	12/8/96	7/28/97		
931662771 VA QKW835	684 ID	20	25	45	18	12/8/96	8/4/97	\$45	\$17.91
931703161	841 ID	25	25	50	20	9/26/96	3/19/97		
931703161	841 ID	25	25	50	20	9/26/96	4/16/97	\$50	\$19.90
931753126 DC 687894	682 CID	25	30	55	22	10/11/96	8/7/97		
931753126 DC 687894	682 CID	25	30	55	22	10/11/96	8/7/97	\$55	\$21.89
931787990	841 ID	25	25	50	20	9/30/96	2/21/97		
931787990	841 ID	25	25	50	20	9/30/96	5/27/97	\$50	\$19.90
931788001	841 ID	15	15	30	12	9/30/96	2/21/97		
931788001	841 ID	15	15	30	12	9/30/96	5/27/97	\$30	\$11.94
931808312	841 ID	15	15	30	12	9/30/96	2/7/97		
931808312	841 ID	15	15	30	12	9/30/96	5/15/97	\$30	\$11.94
931808721	841 ID	25	25	50	20	9/30/96	3/21/97		
931808721	841 ID	25	25	25	10	9/30/96	4/16/97	\$25	\$9.95
931918934	840 ID	50	50	100	40	9/3/96	2/7/97		
931918934	840 ID	50	50	100	40	9/3/96	3/11/97	\$100	\$39.80
931921933 VA ACG4968	681 ID	50	55	105	42	9/8/96	4/21/97		
931921933 VA ACG4968	681 ID	50	55	105	42	9/8/96	5/5/97	\$105	\$41.79
931985331 DC 714045	685 ID	100	105	105	42	1/6/97	7/10/97		
931985331 DC 714045	685 ID	100	105	100	40	1/6/97	8/22/97	\$100	\$39.80
931985331 DC 714045	685 ID	100	105	100	40	1/6/97	8/11/97		
932091311	845 ID	50	50	100	40	1/24/97	7/14/97		
932091311	845 OID	50	50	100	40	1/24/97	7/14/97	\$100	\$39.80
932127825 VA ZKW6914	683 ID	50	55	105	42	11/13/96	5/1/97		
932127825 VA ZKW6914	683 ID	50	55	105	42	11/13/96	5/9/97	\$105	\$41.79
932138045	840 ID	25	25	50	0	8/23/96	12/16/96		
932138045	840 ID	25	25	50	20	8/23/96	2/12/97	\$50	\$19.90
932141011	840 ID	25	25	30	12	8/30/96	1/15/97		
932141011	840 ID	25	25	30	12	8/30/96	1/6/97	\$30	\$11.94

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932171343 MA 186FHF	680 ID	50	55	105	42	9/30/96	3/4/97		
932171343 MA 186FHF	680 ID	50	55	105	42	9/30/96	3/19/97	\$105	\$41.79
932222701	841 ID	25	25	50	20	9/27/96	2/5/97		
932222701	841 ID	25	25	50	20	9/27/96	5/22/97	\$50	\$19.90
932300386 VA ZME2913	684 ID	50	55	105	42	11/29/96	7/7/97		
932300386 VA ZME2913	684 ID	50	55	105	42	11/29/96	7/9/97	\$105	\$41.79
932354651 TX SPL45B	680 ID	20	25	40	16	9/21/96	3/7/97		
932354651 TX SPL45B	680 ID	20	25	45	18	9/21/96	4/14/97	\$40	\$15.92
932355174 VA ZJT8731	682 ID	20	25	45	18	9/25/96	7/30/97		
932355174 VA ZJT8731	682 ID	20	25	45	18	9/25/96	8/18/97	\$45	\$17.91
932356655 MD RGK926	684 ID	20	25	45	18	12/8/96	7/8/97		
932356655 MD RGK926	684 ID	20	25	45	18	12/8/96	7/22/97	\$45	\$17.91
932765772 DC 734675	680 BID	20	25	45	0	8/17/96	4/14/97		
932765772 DC 734675	680 ID	20	25	45	18	8/17/96	4/15/97	\$45	\$17.91
932814960 DC 717847	682 BID	25	30	55	0	10/17/96	3/12/97		
932814960 DC 717847	682 ID	25	30	55	0	10/17/96	8/11/97	\$55	
932818471	839 OID	50	50	100	40	8/7/96	5/15/97		
932818471	839 ID	50	50	100	40	8/7/96	5/16/97	\$100	\$39.80
932838922 DC 806804	680 ID	50	55	105	42	8/16/96	2/7/97		
932838922 DC 806804	680 CID	50	55	105	42	8/16/96	4/9/97	\$105	\$41.79
932888504 PA AXP4953	685 ID	50	55	105	42	2/18/97	8/22/97	\$105	\$41.79
932888504 PA AXP4953	685 BID	50	55	105	0	2/18/97	8/20/97		
932923541 DC 782056	680 OID	20	25	45	18	8/1/96	2/25/97		
932923541 DC 782056	680 ID	20	25	45	18	8/1/96	3/11/97	\$45	\$17.91
932950200	841 OID	25	25	50	20	9/21/96	3/17/97		
932950200	841 ID	25	25	50	20	9/21/96	7/14/97	\$50	\$19.90
932966646	841 ID	25	25	50	20	9/27/96	2/18/97		
932966646	841 ID	25	25	50	20	9/27/96	3/14/97	\$50	\$19.90
932966650	841 ID	25	25	50	20	9/27/96	3/21/97		
932966650	841 ID	25	25	50	20	9/27/96	8/21/97	\$50	\$19.90
932983111 DC 802247	682 OID	20	25	45	18	9/30/96	5/20/97		
932983111 DC 802247	682 CID	20	25	45	18	9/30/96	7/10/97	\$45	\$17.91
933018601 DC 784697	683 TID	50	55	105	0	11/25/96	5/19/97		
933018601 DC 784697	683 ID	50	55	105	42	11/25/96	5/20/97	\$105	\$41.79
933034631 DC 831885	685 ID	50	55	105	42	1/12/97	8/15/97	\$105	\$41.79
933034631 DC 831885	685 BID	50	55	105	0	1/12/97	8/14/97		
933074730 NJ MT363L	683 ID	50	55	105	42	12/16/96	7/16/97		
933074730 NJ MT363L	683 ID	50	55	105	42	12/16/96	7/29/97	\$105	\$41.79
933333822 VA ZJT8731	683 ID	20	25	45	18	10/31/96	7/30/97		
933333822 VA ZJT8731	683 ID	20	25	45	18	10/31/96	8/18/97	\$45	\$17.91
933479396	842 ID	50	50	100	0	10/29/96	2/13/97		
933479396	842 ID	50	50	100	40	10/29/96	3/17/97	\$100	\$39.80
933499501 NJ LC698U	681 ID	25	30	55	22	10/14/96	5/12/97		
933499501 NJ LC698U	681 ID	25	30	50	20	10/14/96	5/16/97	\$50	\$19.90
933514260 DC 675690	682 ID	20	25	45	18	10/19/96	4/28/97		
933514260 DC 675690	682 ID	20	25	45	18	10/19/96	5/5/97	\$45	\$17.91
933735983 DC 714045	686 ID	50	55	50	20	2/2/97	8/11/97		
933735983 DC 714045	686 ID	50	55	105	42	2/2/97	8/22/97	\$50	\$19.90

AGENCY COMMENTS

Auditor's Evaluation of Agency Comments

On March 6, 1998, the District of Columbia Auditor submitted this report in draft for review and comment to the Director of the Department of Public Works, the Office of the Chief Financial Officer, and the Office of the Chief Management Officer. Comments were received from the Director of the Department of Public Works on March 16, 1998 and are appended in their entirety to this report.

Overall, the comments received from the Department of Public Works did not adequately address the issues raised in the draft report concerning the collection and retention of overpaid tickets. In determining the approximate amount of ticket overpayments that are presently stored in Lockheed's Ticket Information Management System, the Auditor relied on data contained in three separate reports prepared by Lockheed at the request of the Transportation Systems Administration. These reports were prepared before the current audit was initiated and focused on ticket overpayments. The administrator of TSA relied upon these reports for an assessment of the overpayment problem. The Office of the Auditor used the same reports to develop an analysis of DPW's ticket overpayment problem.

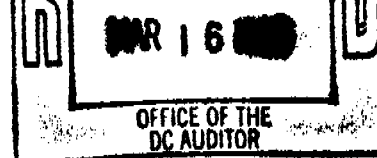
On January 14, 1998, the Auditor requested a consolidated and updated overpayment report from DPW and Lockheed officials. At that time, the Auditor was informed that such a report would not show any significant changes from the overpayment information previously made available to the Auditor.

On February 1, 1998, the Auditor held a meeting with DPW/TSA and Lockheed officials to specifically discuss overpayments identified by Lockheed in the three separate overpayment reports. At no time did DPW or Lockheed officials indicate that the information contained in the three reports did not accurately assess DPW's overpayment problem. Additionally, at no time did DPW or Lockheed officials indicate that a cumulative overpayment report could be made available to the Auditor as earlier requested. Therefore, the Auditor questions the credibility of an unaudited overpayment report that was developed by DPW and Lockheed after the issuance of and in response to the draft audit report.

Because the information contained in the March 11, 1998 overpayment report, attached to DPW's comments, represents unaudited data, the Auditor stands by the original finding that DPW accumulated and retained overpayments on 829,837 tickets totaling approximately \$17,847,891.

The Auditor further recommends that an assessment of ticket overpayments be conducted by the Office of the Auditor in conjunction with an independent information systems expert to determine the accuracy of Lockheed's March 11, 1998 overpayment report.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF PUBLIC WORKS
2000 14TH STREET, N.W.
6TH FLOOR
WASHINGTON, D.C. 20009



OFFICE OF THE DIRECTOR
(202) 939-8000



March 16, 1998

Ms. Deborah K. Nichols
Interim District of Columbia Auditor
415 12th Street, N.W., room 210
Washington, D.C. 20004

Dear Ms. Nichols:

Thank you for the opportunity to respond to the draft audit report entitled "Follow-Up Audit of the Ticket Processing and Delinquent Ticket Collections Contracts." The responses of the Department of Public Works are outlined in this letter and were prepared within the time constraints imposed by the response deadline.

The draft audit report raises issues concerning the refund of overpayments made on parking tickets. The Department of Public Works is committed to quality service to the public and intends to provide a fair and equitable process for the refund of overpayments. We have already initiated a proactive policy to identify persons in overpayment status and notify them by mail of the overpayment status. We are in the process of refining our policies in this area and, in the best interests of everyone, will formally publish rules within 120 days. Our final determination of the cutoff period for issuance of refunds will be guided by provisions of the Unclaimed Property Act, applicable statute of limitations, and any legal determinations on the propriety of issuing refunds.

To the extent that some overpayments may have been tied to the interaction of the ticket system with the aged Motor Vehicle Information System (MVIS), the pending modernization of MVIS should minimize problems resulting from the "registration hold" process and the communication of records to the ticket system.

We are convinced that overpayments are largely unavoidable and will always occur as a small percentage of total revenue collected. Historically, this percentage has ranged between one and two percent of gross collections. While we are reviewing current processes to minimize avoidable overpayments, there are many

causes of overpayments, some of which are behavioral rather than system-based, and it is unlikely that we will ever reach a point of a zero overpayment balance.

Perhaps most importantly, we wish to point out that the data utilized by the auditors has been incorrectly aggregated, resulting in an exaggeration of both ticket and overpayment amounts. This is understandable, since one cumulative report was not available to the auditors during their review and three separate reports with different timeframes, parameters and formats were utilized instead. In order to obtain a more accurate assessment, we requested the ticket processing contractor to run a cumulative report to include all data from the earliest year in system files, which is 1981. This report, received after the date of the draft audit report, indicates a cumulative overpayment balance of approximately \$12.4 million, which is considerably less than the approximate balance of \$17.8 million indicated on the auditor report. It should also be noted that the majority of the total balance (approximately \$7.7 million) represents overdue balances from years prior to 1992.

The Department of Public Works offers the following specific comments with respect to the audit comments and findings cited:

FINDING:

The Department of Public Works has taken no action concerning previous audit recommendations to:

- . require the contractor to obtain consent from the contracting officer to subcontract any further work to be performed under the ticket processing contract;
- . require the subcontract with PRWT to be terminated; and
- . require approval from the District's contracting officer, the Director of Administrative Services, before any future subcontracts for imaging or any other services under the ticket processing contract are awarded to the contractor.

RESPONSE:

While it is clearly an option for the contracting officer to independently determine a prospective subcontractor's responsibility, this is not a general practice in the District Government, and Title 27 DCMR sec. 2203.1 only requires that a prospective prime contractor shall be accountable for determining the responsibility of prospective subcontractors. The District contracted with the prime contractor, Lockheed Martin IMS, through an open and competitive process. In addition, there is no established contractual relationship between the District and the

subcontractor. It is not the role of the Contracting Officer to subject his or her will on the prime contractor with reference to who will perform as subcontractors.

The prime contractor, Lockheed Martin IMS, retains full responsibility for the quality of service delivery to the District and management of its subcontractors. In this regard, we have found the performance of Lockheed Martin IMS to be satisfactory.

FINDING:

The Department of Public Works and D.C. Treasurer's Office have not taken adequate steps to ensure that revenue collections reported by Lockheed and the District's Financial Management System are reconciled on a regular basis but not less than quarterly.

RESPONSE:

We are concerned that there are large discrepancies between the revenue data in the contractor's revenue reports and the Financial Management System. There were initial attempts made, as noted in the draft report, which did not rectify the discrepancies. Data discrepancies within the Financial Management System (FMS) are not limited to the ticket revenue collection program. There have been reconciliation issues with most agency feeder systems to FMS, which is a major reason why the District is moving to a new financial system.

We will initiate a review of past financial data, to the extent that it is available, to determine causes for past discrepancies. Outside resources will be necessary to accomplish this, and we anticipate that this review will commence within six months. More importantly, we will establish an ongoing reconciliation process to be effective as soon as staff resources can be assigned and procedures developed.

FINDING:

The traffic enforcement program, with particular emphasis on revenue collections and the ticket processing and collection contractor, should be included in the forthcoming annual audit conducted by the District's independent auditor.

RESPONSE:

The scope of the annual D.C. independent audit is within the purview of the Office of the Inspector General and is not an agency-based decision. If the ticket revenue collection program is not included in the annual audit program, it may be appropriate for the Office of the Inspector General to review the program from time to time in addition to its other monitoring responsibilities. We

propose to assign additional in-house resources to monitor the ticket revenue collection contracts, in order to better focus on quality assurance and data integrity.

FINDING:

The Council of the District of Columbia should consider amending D.C. Code, sec. 40-608 to change the period that data is reported by the Department of Public Works for the parking enforcement and adjudication programs from a calendar year basis to a fiscal year basis.

RESPONSE:

We concur with this finding.

FINDING:

The Department of Public Works has not ceased the practice of paying the contractor from appropriated revenue, and should seek an appropriation to pay for these services.

RESPONSE:

We have worked diligently to obtain the necessary approvals for the funding of ticket processing operations from appropriated funds. In FY 1996, we requested that the FY 1998 budget be corrected to include funding for the ticket processing and collection contracts. This was not done at that time. We have maintained communication with the Office of the Chief Financial Officer, and by letter dated January 28, 1998 (enclosed), the Chief Financial Officer committed to begin funding the ticket revenue collection contracts from appropriated funds. In addition, we have submitted a decision package to adjust the appropriated budget in FY 1999, and are seeking to determine the appropriation source to be charged.

FINDING:

The Department of Public Works' Office of Information and Telecommunications Systems should work in concert with the Bureau of Motor Vehicle Services and the Bureau of Adjudication to devise a methodology to share vital information which would result in tracking those individuals whose vehicles are registered in the District of Columbia that have outstanding parking violation tickets and prevent them from receiving motor vehicle services until they have satisfied their obligations to the District of Columbia for outstanding tickets.

RESPONSE:

The Bureau of Motor Vehicle Services currently works in concert

with the Office of Information and Telecommunications Systems to ensure that vital information is available in the Motor Vehicle Information System. The Bureau of Motor Vehicle Services currently follows a standard procedure to withhold the issuance of all vehicle related transactions until satisfaction of outstanding parking tickets, to include payment in full or evidence of dismissal of liability resulting from a hearing. Lists of parking tickets in default status are included with registration renewal applications, which are mailed monthly. These tickets must be satisfied as a precondition to registration renewal.

The registration hold process will be revisited in the transition to a new motor vehicle information system, which is scheduled for implementation in the first quarter of calendar year 1999.

FINDING:

DPW failed to establish a fair and effective policy to govern the refund of ticket overpayments and improperly accumulated and retained parking ticket overpayments.

RESPONSE:

We have been diligent in processing refunds when persons have applied for them, and we have established a refund program to prevent the continuation of the overpayment problem. We will promulgate a clear, equitable policy in the near future which will be consistent with District law, customer service and sound fiscal management.

While an overpayment plan could have been put into place earlier, we note that other cities under similar circumstances have not had long-standing programs. For example, Boston and Philadelphia both implemented initial overpayment plans in the mid-1990's.

FINDING:

DPW improperly accumulated and retained parking ticket overpayments totaling approximately \$17.8 million.

RESPONSE:

As we indicated during the audit, available data reports that were provided to the auditors were not designed to accurately assess the cumulative overpayment picture. Enclosed with this response are data tables which more accurately reflect the overpayment balances. On the following page, the totals on these tables are contrasted with the totals in the draft auditor report.

	Ticket Count	Dollar Amount
Draft audit report (p. 12)	829,837	\$17,847,891
Enclosed tables	<u>617,989</u>	<u>\$12,426,133</u>
Difference	211,848	\$5,421,758

The numbers on the enclosed tables are still substantial, but we will initiate an overpayment reduction plan.

FINDING:

DPW's decision to reapply overpayments on 60,989 tickets to other outstanding tickets issued to the same license plates was inappropriate and ineffective, and should request overpayment reports from the contractor.

RESPONSE:

DPW has arranged with the contractor for monthly reports to document the effectiveness of the overpayment notification process. The initial report is expected by the end of March, 1998, and we will share the findings with the Office of the D.C. Auditor.

The practice of offsetting amounts owed to other tickets on the same plate number is routine in other cities, including Boston and Philadelphia, and we are advised that this practice has been noncontroversial, as well as effective and appropriate. In Chicago, it is a policy to withhold refunds to persons who owe the city any money in any city program.

FINDING:

DPW reapplied and archived over \$14.4 million of overpaid tickets without making an effort to refund the overpayments and failed to notify respondents concerning the disposition of overpayments.

RESPONSE:

Archiving is a commonly used strategy in many computing organizations to reduce the size of the record database and to place on inactive status those records which have not had activity over a designated period of time. As indicated in the audit report, archived records can easily be retrieved. Since the District did not have a formal written overpayment notification policy in place at the time of prior archives, the archiving did not make it any less likely that persons whose records were archived would receive refunds.

The notion that overpayments should be subject to archiving is not new. We have located in our records an archive criteria document from 1982 which lists tickets in overpaid status as eligible for

archiving in the same manner as other tickets. Although eligible for archiving, tickets in overpaid status were not archived for a number of years. The archive policy will be reconsidered as part of our ongoing assessment and will be consistent with published rules.

We intend to notify persons when a payment reapplication has been made in order to minimize the possibility that the same ticket may be paid twice.

FINDING:

The contractor improperly collected approximately \$67,155 in fees on overpayments of delinquent tickets.

RESPONSE:

The draft report notes that Lockheed's collection of these fees was improper because the contractor had already collected a fee from the original payment in full.

The ticket collections contractor is paid on the basis of a contingency fee on revenue collected. Tickets are regularly assigned to the contractor for collections activity. Fees can only be collected on payments made on assigned tickets. The fees in question were billed by the contractor after it was requested by the District to reapply, on two occasions, outstanding overpayment balances to other tickets on the same tags. In some instances, the oldest outstanding ticket had already been assigned for delinquent collections and collections activity had been initiated.

The draft report also notes four reasons why overpayments were attributed by officials of the Division of Motor Vehicles (formerly known as the Transportation Systems Administration). There are myriad causes for overpayments, and in fact nine reasons were provided to the auditor during the review. The additional reasons not listed in the report include overlapping overdue notices that arrive after payments are made; mistaken double payment on the same violation; charging of tickets to the wrong tags; more than one person remitting payment on the same ticket; and payments received by mail after the fifteenth day and prior to the twenty fifth day, in which a penalty for late payment is included (the latter reason applies to overpayments made prior to May 2, 1994).

Prior to authorizing payment to Lockheed Martin IMS for fees billed as a result of the 1996 overpayment reapplication process, we had discussions with the company and the Office of the Corporation Counsel on the basis for the fees. The company advised that the ticket collections contract does not exclude overpayments from fee collection and that overpayments applied on a case-by-case basis always had fees applied or removed. Further, the work performed to

determine overpaid status and correctly apply or archive overpayments, and to ultimately print and mail overpayment letters, was beyond the scope of the contract and represents an ongoing expense to the company. In a discussion with the Office of the Corporation Counsel in October, 1996, we were advised that the company's position in assessing contingency fees on overpaid tickets is fairly compelling and that it would be difficult to argue an implied exclusion if the payments were legitimately applied to assigned tickets.

When refunds are made by the District resulting from overpayments applied to tickets in collections status, the refunded amounts are reduced from future contractor billings to the District.

A new solicitation for ticket processing and collections services has been advertised and responses are due to be received on March 31, 1998. DPW has inserted language in this RFP to deny payment of a contingency fee as the result of an overpayment on any ticket.

FINDING:

Some payments were not posted to the ticket system on a timely basis, thereby contributing to overpayments.

RESPONSE:

The audit report noted instances of delays in posting payments through the lockbox to the ticket system. In the fall of 1996, Lockheed implemented a "point of proof" quality control methodology which ensured that all payments received are updated and that payment batches are tracked more effectively. In calendar 1997, Lockheed processed in excess of one million payments in the ticket processing contract, and only 3.94% of payments were updated later than 48 hours after receipt. Many of the payments which were not updated in this timeframe were payment research items or resulted from faulty tapes, and updates generally occurred within a week. We can confirm that some payments which updated late to the ticket system prior to the implementation of the new quality control methodology were the result of delayed payment batch update by Lockheed. Not all delayed payment entries, however, are attributable to the contractor.

The contractor has mailed millions of notices during the years covered by the audit, and there will certainly be instances when a person may receive a notice after a ticket has already been paid. Usually this is due to notices crossing in the mail or payment of the original fine and not the penalty amount. System logic prevents notices from being mailed less than thirty days apart.

FINDING:

DPW's Office of Information and Telecommunications Services (OITS) erroneously submitted double entries to Lockheed.

RESPONSE:

We will review the data which you have used to verify that the transactions are in fact double entries and that the records were not part of the population for which the District has already been compensated by the contractor. We request that data provided for our review be relatively recent to better ensure that the originally transmitted data can be located intact by OITS. We request that you submit all available information at your earliest convenience. DPW will coordinate its review with the contractor.

If our review of your data indicates that the contractor has taken fees on additional double entries which were not previously compensated, we will be reimbursed.

The data transmission process will be revisited in the transition to a new motor vehicle information system. In addition, we will request OITS and the contractor to work together on quality controls to minimize the possibility of future double entries.

Corrections:

The contractor is identified, on page 2, as Lockheed Information Management Systems. The company name has been Lockheed Martin IMS Corporation since 1995. Two subcontractors are identified on page 7; a third subcontractor, Kidd International, should also be listed as a subcontractor on the ticket collections contract.

Both the District and the contractor are identified, on page 13, as retaining overpayments. The contractor does not retain overpayments; all funds received are deposited into the District bank depository.


On page 4 of the Background, the comment is made that the contractor, not the District, determines when tickets are eligible for assignment. The District's contract with Lockheed establishes the criteria by which tickets are to be assigned for delinquent collections activity. Scheduling logic in the ticket system compares ticket status with the contract criteria to identify those tickets eligible for assignment in accordance with the criteria, on a monthly basis.

Conclusion

DPW is dedicated to continuing its efforts to improve the quality of service extended to its customers. With this in mind, we are

pleased to receive any constructive criticism of our processes which will improve service delivery.

Sincerely,


for Cell Bernardino
Director

Enclosures

OVERPAYMENT REPORT
As of 3/11/88

Calendar Year Tickets Issued	Number of Overpaid Tickets	Dollar Value of Overpaid Tickets	Count with Name and Address	Percent with Name and Address	Count with NO Name & Address	Percent with NO Name & Address	Count on DC Tags	Percent on DC Tags	Count on NON- DC Tags	Percent on NON-DC Tags
Pre -1985 Parking	87,977	\$1,247,350	5,169	5.88%	82,808	94.12%	42,333	48.12%	45,644	51.88%
Pre -1985 Moving	25,188	\$535,394	196	0.78%	24,992	99.22%	9,980	39.62%	15,208	60.38%
Total Pre -1985	113,165	\$1,782,744	5,365	4.74%	107,800	95.26%	52,313	46.23%	60,852	53.77%
Parking 1985	49,273	\$725,196	192	0.39%	49,081	99.61%	18,113	36.76%	31,160	63.24%
Moving 1985	5,224	\$166,035	218	4.17%	5,006	95.83%	2,190	41.92%	3,034	58.08%
Total 1985	54,497	\$891,231	410	0.75%	54,087	99.25%	20,303	37.26%	34,194	62.74%
Parking 1986	58,484	\$735,775	463	0.79%	58,021	99.21%	12,970	22.18%	45,514	77.82%
Moving 1986	2,774	\$79,284	160	5.77%	2,614	94.23%	1,145	41.28%	1,629	58.72%
Total 1986	61,258	\$815,059	623	1.02%	60,635	98.98%	14,115	23.04%	47,143	76.96%
Parking 1987	62,852	\$800,756	553	0.88%	62,299	99.12%	13,049	20.76%	49,803	79.24%
Moving 1987	3,411	\$97,350	138	4.05%	3,273	95.95%	1,401	41.07%	2,010	58.93%
Total 1987	66,263	\$898,106	691	1.04%	65,572	98.96%	14,450	21.81%	51,813	78.19%
Parking 1988	38,396	\$634,796	1,157	3.01%	37,239	96.99%	10,969	28.57%	27,427	71.43%
Moving 1988	3,047	\$81,778	52	1.71%	2,995	98.29%	1,164	38.20%	1,863	61.80%
Total 1988	41,443	\$716,574	1,209	2.92%	40,234	97.08%	12,133	29.28%	29,310	70.72%
Parking 1989	34,600	\$701,624	1,778	5.14%	32,822	94.86%	11,526	33.31%	23,074	66.69%
Moving 1989	2,715	\$65,569	14	0.52%	2,701	99.48%	925	34.07%	1,790	65.93%
Total 1989	37,315	\$767,193	1,792	4.80%	35,523	95.20%	12,451	33.37%	24,864	66.63%
Parking 1990	36,716	\$790,609	2,318	6.31%	34,398	93.69%	11,985	32.64%	24,731	67.36%
Moving 1990	2,666	\$102,914	57	2.14%	2,609	97.86%	918	34.43%	1,748	65.57%
Total 1990	39,382	\$893,523	2,375	6.03%	37,007	93.97%	12,903	32.76%	26,479	67.24%
Parking 1991	31,615	\$816,391	10,462	33.09%	21,153	66.91%	10,877	34.40%	20,738	65.60%
Moving 1991	2,572	\$106,454	882	34.29%	1,690	55.71%	853	33.16%	1,719	66.84%
Total 1991	34,187	\$922,845	11,344	33.18%	22,843	66.82%	11,730	34.31%	22,457	65.69%
Parking Pre-85-91	399,913	\$6,452,497	22,092	5.52%	377,821	94.48%	131,822	32.96%	288,091	67.04%
Moving Pre-85-91	47,597	\$1,234,778	1,717	3.61%	45,880	96.39%	18,576	39.03%	29,021	60.97%
Total Pre-85-91	447,510	\$7,687,275	23,809	5.32%	423,701	94.68%	150,398	33.61%	287,112	66.39%

OVERPAYMENT REPORT

As of 3/11/98

Calendar Year Tickets Issued	Number of Overpaid Tickets	Dollar Value of Overpaid Tickets	Count with Name and Address	Percent with Name and Address	Count with NO Name & Address	Percent with NO Name & Address	Count on DC Tags	Percent on DC Tags	Count on NON- DC Tags	Percent on NON-DC Tags
Parking 1992	31,651	\$846,943	24,393	77.07%	7,258	22.93%	11,129	35.16%	20,522	64.84%
Moving 1992	2,173	\$72,801	2,165	99.63%	8	0.37%	670	30.83%	1,503	69.17%
Total 1992	33,824	\$919,744	26,558	78.52%	7,266	21.48%	11,799	34.88%	22,025	65.12%
Parking 1993	29,703	\$801,762	22,862	76.97%	6,841	23.03%	9,765	32.88%	19,938	67.12%
Moving 1993	2,399	\$79,083	2,345	97.75%	54	2.25%	775	32.31%	1,624	67.69%
Total 1993	32,102	\$880,845	25,207	78.52%	6,895	21.48%	10,540	32.83%	21,562	67.17%
Parking 1994	22,933	\$630,274	18,015	78.55%	4,918	21.45%	7,022	30.62%	15,911	69.38%
Moving 1994	2,008	\$66,533	1,936	96.41%	72	3.59%	669	33.32%	1,339	66.68%
Total 1994	24,941	\$696,807	19,951	79.99%	4,990	20.01%	7,691	30.84%	17,250	69.16%
Parking 1995	20,836	\$616,874	16,009	76.83%	4,827	23.17%	6,333	30.39%	14,503	69.61%
Moving 1995	1,499	\$52,817	1,444	96.33%	55	3.67%	461	30.75%	1,038	69.25%
Total 1995	22,335	\$669,691	17,453	78.14%	4,882	21.86%	6,794	30.42%	15,541	69.58%
Parking 1996	24,536	\$747,263	19,048	77.63%	5,488	22.37%	7,895	32.18%	16,641	67.82%
Moving 1996	2,301	\$65,468	2,250	97.78%	51	2.22%	575	24.99%	1,726	75.01%
Total 1996	26,837	\$812,731	21,298	79.36%	5,539	20.64%	8,470	31.56%	18,367	68.44%
Parking 1997	24,969	\$623,153	18,535	74.26%	6,424	25.74%	8,044	32.23%	16,915	67.77%
Moving 1997	3,277	\$92,666	3,180	97.04%	97	2.96%	817	24.93%	2,460	75.07%
Total 1997	28,236	\$715,819	21,715	76.91%	6,521	23.09%	8,861	31.38%	19,375	68.62%
Parking 1998	1,905	\$35,226	1,166	61.21%	739	38.79%	631	33.12%	1,274	66.88%
Moving 1998	299	\$7,995	289	96.66%	10	3.34%	103	34.45%	196	65.55%
Total 1998	2,204	\$43,221	1,455	66.02%	749	33.98%	734	33.30%	1,470	66.70%
Parking 92-98	156,523	\$4,301,495	120,028	76.68%	36,495	23.32%	50,819	32.47%	105,704	67.53%
Moving 92-98	13,956	\$437,363	13,609	97.51%	347	2.49%	4,070	29.16%	9,886	70.84%
Total 92-98	170,479	\$4,738,858	133,637	78.39%	36,842	21.61%	54,889	32.20%	115,590	67.80%

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Chief Financial Officer



Anthony A. Williams

January 28, 1998

Dr. Andrew F. Brimmer, Chairman
District of Columbia Financial Responsibility
And Management Assistance Authority
One Thomas Circle, N.W., Suite 900
Washington, D.C. 20005

RE: Parking Meter Contracts

Dear Dr. Brimmer:

As requested by the Council, we have reviewed two contracts for the Department of Public Works for parking meter management. As you know, there is no budget authority for these contracts in the FY 1998 budget. My office has therefore reviewed the contracts to determine if they qualify for certification under Public Law 105-100 Sec. 138 (a)(1)(B)(ii), which states in part:

Notwithstanding any other provision of law, the total amount appropriated in this Act for operating expenses for the District of Columbia for fiscal year 1998...shall not exceed the lesser of \$4,811,906,000 (of which \$118,269,000 shall be from intra-District funds), which amount may increase by the following: ...additional expenditures which the Chief Financial Officer...certifies will produce additional revenues during such fiscal year at least equal to 200 percent and is approved by the "Authority".

In determining whether proposed expenditures qualify under this section we reviewed the reasonableness of the assumptions for revenues and examined the availability of funding in the current financial plan and budget for the current fiscal year.

Parking Meter Contract

We have reviewed the projections and assumptions used to determine the potential revenue that would be generated under this contract.

The fiscal year 1998 parking meter revenue budget includes revenue projections of \$9.9 million for parking meter collections. This projection was based on having a collection contract in place on October 1, 1997. It is because the contract has not yet been signed, that the revenue projection is revised downward to \$5.5 million. Without a contract for the remainder of the year, the revenue projection will continue to decrease to \$3.2 million.

The cost of the parking meter replacement contract for FY 1998, which is not currently included in the budget, is \$2.9 million. As shown in the table below, additional budget authority of \$12.8 million for FY 1998-2001 is estimated to result in increased parking meter revenues of \$27.8 million over the same period.

A comparison of additional budget authority required for the parking meter replacement contract and the resulting estimated change in parking meter revenues is also presented below.

<u>Fiscal Year</u>	<u>Additional Budget Authority Required</u>	<u>Parking Meter Collection</u>		<u>Difference</u>
		<u>With New Authority</u>	<u>Without New Authority</u>	
1998	\$ 2.9M	\$ 5.5M	\$3.2M	\$ 2.3M
1999	\$ 2.9M	\$ 9.9M	\$2.0M	\$ 7.9M
2000	\$ 3.2M	\$11.1M	\$1.0M	\$10.0M
2001	<u>\$ 3.8M</u>	<u>\$14.1M</u>	\$1.0M	<u>\$13.1M</u>
	\$12.8M	\$ 40.6		\$33.3M

Based on these projections, the potential lost revenue of \$2.3 million for fiscal year 1998 cannot be certified under P.L. 105-100 Sec.138(a)(1)(B) as being two hundred percent of the contract cost of \$2.9 million for the current fiscal year. In absence of this certification, the contract could be considered under management reform without additional cost to the management reform projects, by identifying existing funds to be used until the point in the contract when revenue is sufficient to fund two hundred percent of the cost. If these options are not used, the cost of this contract would have to come from other resources either within the Department of Public Works or a reprogramming from other parts of the government.

Ticket Processing Contract

The ticket-processing contract includes revenue projections of \$40.1 million for traffic fines. The Ticket Processing contract will cost \$9.3 million for FY 1998. With the contract, revenues are projected to increase to \$58.8 million. The assumptions associated with this contract appear reasonable based on our review.

The costs for both the Parking Meter Replacement and Ticket Processing contracts total \$12.2 million. The budget authority needed is \$12.2 million. The Parking Meter contract does not meet the requirement of P.L. 105-100. It does not generate additional revenues at least equal to 200 percent of the expenditure. However, the Ticket Processing contract would generate additional revenues at least equal to 200 percent of the expenditure and can be certified under P.L. 105-100.

Conclusion

The ticket processing contract is hereby certified by the Chief Financial Officer of the District of Columbia under the provisions of P.L. 105-100 Sec. 138(a)(1)(B)(ii).

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There are three options available to fund the parking meter contract.

- Management reform
- Identifying existing resources until such time as the contract will qualify for management reform
- Reprogramming other funds

The parking meter contract is projected to generate funds at least equal to the expenditure. Therefore, we recommend that the contract be considered for management reform. I would be happy to discuss the other options to ensure this important contract is funded.

Sincerely,



Anthony A. Williams
Chief Financial Officer

AAW/SRM

cc: Marion S. Barry, Mayor
Linda W. Cropp, Chairman, Council of the District of Columbia
Harry Thomas, Councilmember
Camille Cates Barnett, Chief Management Officer