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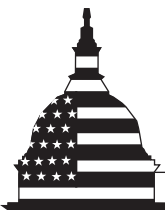
Testimony
Before the Subcommittee on
Transportation Security, Committee on
Homeland Security, House of
Representatives

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AVIATION SECURITY

Progress Made, but
Challenges Persist in
Meeting the Screening
Mandate for Air Cargo

Statement of Steve Lord, Director
Homeland Security and Justice Issues



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Highlights of [GAO-11-413T](#), a testimony before the Subcommittee on Transportation Security, Committee on Homeland Security, House of Representatives

Why GAO Did This Study

The Department of Homeland Security's (DHS) Transportation Security Administration (TSA) is the federal agency with primary responsibility for securing the air cargo system. The Implementing Recommendations of the 9/11 Commission Act of 2007 mandated DHS to establish a system to screen 100 percent of cargo flown on passenger aircraft by August 2010. GAO reviewed TSA's progress in meeting the act's screening mandate, and any related challenges it faces for both domestic (cargo transported within and from the United States) and inbound cargo (cargo bound for the United States). This statement is based on prior reports and testimonies issued from April 2007 through December 2010 addressing the security of the air cargo transportation system and selected updates made in February and March 2011. For the updates, GAO obtained information on TSA's air cargo security programs and interviewed TSA officials.

What GAO Recommends

GAO has made recommendations in prior work to strengthen air cargo screening. Although not fully concurring with all recommendations, TSA has taken or has a number of actions underway to address them. Continued attention is needed to ensure some recommendations are addressed, such as establishing a mechanism to verify screening data. TSA provided technical comments on the information in this statement, which GAO incorporated as appropriate.

View [GAO-11-413T](#) or key components. For more information, contact Steve Lord at (202) 512-4379 or lords@gao.gov.

March 9, 2011

AVIATION SECURITY

Progress Made, but Challenges Persist in Meeting the Screening Mandate for Air Cargo

What GAO Found

As of August 2010, TSA reported that it met the mandate to screen 100 percent of air cargo as it applies to domestic cargo, but as GAO reported in June 2010, TSA lacked a mechanism to verify the accuracy of the data used to make this determination. TSA took several actions in meeting this mandate for domestic cargo, including creating a voluntary program to facilitate screening throughout the air cargo supply chain; taking steps to test technologies for screening air cargo; and expanding its explosives detection canine program, among other things. However, in June 2010 GAO reported that TSA did not have a mechanism to verify screening data and recommended that TSA establish such a mechanism. TSA partially concurred with this recommendation and stated that verifying such data would be challenging. As GAO reported in June 2010, data verification is important to provide reasonable assurance that screening is being conducted at reported levels. As GAO further reported in June 2010, there is no technology approved or qualified by TSA to screen cargo once it is loaded onto a pallet or container—both of which are common means of transporting domestic air cargo on passenger aircraft. As a result, questions remain about air carriers' ability to effectively screen air cargo on such aircraft.

TSA has also taken a number of steps to enhance the security of inbound air cargo, but also faces challenges that could hinder its ability to meet the screening mandate. TSA moved its deadline for meeting the 100 percent screening mandate as it applies to inbound air cargo to the end of 2011, up 2 years from when the TSA administrator previously reported the agency would meet this mandate. According to TSA officials, the agency determined it was feasible to accelerate the deadline as a result of trends in air carrier reported screening data and discussions with air cargo industry leaders regarding progress made by industry to secure cargo on passenger aircraft. TSA also took steps to enhance the security of inbound cargo following the October 2010 Yemen air cargo bomb attempt—such as requiring additional screening of high-risk cargo prior to transport on an all-cargo aircraft. However, TSA continues to face challenges GAO identified in June 2010 that could impact TSA's ability to meet this screening mandate as it applies to inbound air cargo. For example, GAO reported that TSA's screening percentages were estimates and were not based on actual data collected from air carriers or other entities, such as foreign governments, and recommended that TSA establish a mechanism to verify the accuracy of these data. TSA partially agreed, and required air carriers to report inbound cargo screening data effective May 2010. However, TSA officials stated while current screening percentages are based on actual data reported by air carriers, verifying the accuracy of the screening data is difficult. It is important for TSA to have complete and accurate data to verify that the agency can meet the screening mandate. GAO will continue to monitor these issues as part of its ongoing review of TSA's efforts to secure inbound air cargo, the final results to be issued later this year.

Mr. Chairman and Members of the Subcommittee:

I appreciate the opportunity to participate in today's hearing to discuss the security of the nation's air cargo system. In 2009, about 6.5 billion pounds of cargo were transported on U.S. passenger flights—approximately 56 percent of which was transported domestically (domestic cargo) and 44 percent of which was transported on flights arriving in the United States from a foreign location (inbound cargo).¹ The October 2010 discovery of explosive devices in air cargo packages bound for the United States from Yemen, and the 2009 Christmas Day plot to detonate an explosive device during an international flight bound for Detroit, provide vivid reminders that civil aviation remains a key terrorist target. According to the Transportation Security Administration (TSA), the security threat posed by terrorists introducing explosive devices in air cargo shipments is significant, and the risk and likelihood of such an attack directed at passenger aircraft is high.

The Aviation and Transportation Security Act (ATSA), enacted into law shortly after the September 11, 2001, terrorist attacks, established TSA and gave the agency responsibility for securing all modes of transportation, including the nation's civil aviation system, which includes air carrier operations (domestic and foreign) to, from, and within the United States.² For example, ATSA requires that TSA provide for the screening of all passengers and property, including cargo, transported on passenger aircraft.³ ATSA further requires that a system be in operation, as soon as practicable after ATSA's enactment (on November 19, 2001), to screen, inspect, or otherwise ensure the security of the cargo transported by all-cargo aircraft—generally, aircraft that carry only cargo and no passengers—to, from, and within the United States.⁴ To help enhance the

¹For the purposes of this statement, domestic cargo refers to cargo transported by air within the United States and from the United States to a foreign location by both U.S. and foreign air carriers, and inbound cargo refers to cargo transported by both U.S. and foreign air carriers from a foreign location to the United States. These cargo statistics were provided by the Transportation Security Administration from the Bureau of Transportation Statistics.

² See Pub. L. No. 107-71, 115 Stat. 597 (2001).

³ See Pub. L. No. 107-71, § 110(b), 115 Stat. at 614-15 (codified as amended at 49 U.S.C. § 44901).

⁴ See 49 U.S.C. § 44901(f) (requiring the system to be in operation as soon as practicable after the date of enactment—November 19, 2001—but without establishing a firm deadline).

security of air cargo, the Implementing Recommendations of the 9/11 Commission Act of 2007 (9/11 Commission Act) mandated the Department of Homeland Security (DHS) to establish a system to screen 100 percent of cargo on passenger aircraft—including the domestic and inbound flights of foreign and U.S. passenger operations—by August 2010.⁵ The 9/11 Commission Act defines screening for purposes of the air cargo screening mandate as a physical examination or nonintrusive methods of assessing whether cargo poses a threat to transportation security.⁶ The act further requires that such a system provide a level of security commensurate with the level of security for the screening of checked baggage. According to TSA, the mission of its air cargo security program is to secure the air cargo transportation system while not unduly impeding the flow of commerce. Although the mandate is applicable to both domestic and inbound cargo, TSA stated that it must address the mandate for domestic and inbound cargo through separate systems because of limitations in its authority to regulate international air cargo industry stakeholders operating outside the United States.

My statement today addresses TSA's progress and challenges in meeting the 9/11 Commission Act mandate to screen air cargo on passenger flights, both domestic cargo and cargo transported from a foreign location to the United States, known as inbound air cargo. My comments are based primarily on our prior reports and testimonies issued from April 2007 through December 2010 addressing the security of the air cargo

⁵ See Pub. L. No. 110-53, § 1602(a), 121 Stat. 266, 477-79 (2007) (codified at 49 U.S.C. § 44901(g)).

⁶ Although TSA is authorized to approve additional methods for screening air cargo beyond the physical examination or nonintrusive methods listed in the statute, the statute expressly prohibits the use of methods that rely solely on performing a review of information about the contents of cargo or verifying the identity of a shipper. See 49 U.S.C. § 44901(g)(5).

transportation system, with selected updates in February and March 2011.⁷ For these reports, we reviewed documents such as TSA's air cargo security policies and procedures and conducted site visits to four category X airports and one category I airport in the United States that process domestic and inbound air cargo.⁸ We selected these airports based on airport size, passenger and air cargo volumes, location, and participation in TSA's screening program. For the updates, we obtained information on TSA's air cargo security programs and interviewed senior TSA officials regarding plans, strategies, and steps taken to meet the 100 percent screening mandate since December 2010. More detailed information about our scope and methodology is included in our reports and testimonies. We conducted this work in accordance with generally accepted government auditing standards. We shared the information in this statement with TSA officials who provided technical comments that were incorporated as appropriate.

⁷ See GAO, *Aviation Security: DHS Has Taken Steps to Enhance International Aviation Security and Facilitate Compliance with International Standards, but Challenges Remain*, [GAO-11-238T](#) (Washington, D.C.: Dec. 2, 2010); *Aviation Security: Progress Made but Actions Needed to Address Challenges in Meeting the Air Cargo Screening Mandate*, [GAO-10-880T](#) (Washington, D.C.: June 30, 2010); *Aviation Security: TSA Has Made Progress but Faces Challenges in Meeting the Statutory Mandate for Screening Air Cargo on Passenger Aircraft*, [GAO-10-446](#) (Washington, D.C.: June 28, 2010); *Homeland Security: Better Use of Terrorist Watchlist Information and Improvements in Deployment of Passenger Screening Checkpoint Technologies Could Further Strengthen Security*, [GAO-10-401T](#) (Washington, D.C.: Jan. 27, 2010); *Aviation Security: Foreign Airport Assessments and Air Carrier Inspections Help Enhance Security, but Oversight of These Efforts Can Be Strengthened*, [GAO-07-729](#) (Washington, D.C.: May 11, 2007); and *Aviation Security: Federal Efforts to Secure U.S.-Bound Air Cargo Are in the Early Stages and Could Be Strengthened*, [GAO-07-660](#) (Washington, D.C.: Apr. 30, 2007).

⁸ There are 462 TSA-regulated airports in the United States. TSA classifies the airports it regulates into one of five categories (X, I, II, III, and IV) based on various factors, such as the total number of takeoffs and landings annually, the extent to which passengers are screened at the airport, and other special security considerations. In general, category X airports have the largest number of passenger boardings, and category IV airports have the smallest.

TSA Reports that It Met the Screening Mandate as It Applies to Domestic Cargo, but Previously Identified Data Limitations and Other Challenges Persist

TSA took several actions to address the 9/11 Commission Act mandate to screen 100 percent of air cargo as it applies to domestic cargo transported on passenger aircraft by August 2010. As of August 2010, TSA reported that it met the 9/11 Commission Act mandate to screen 100 percent of air cargo as it applies to domestic cargo, although in June 2010 we reported that TSA lacked a mechanism to verify the accuracy of the data used to make this determination.

To help meet the mandate, TSA took several actions, among them:

TSA created a voluntary program to facilitate screening throughout the air cargo supply chain. Since TSA concluded that relying solely on air carriers to conduct screening would result in significant cargo backlogs and flight delays, TSA created the voluntary Certified Cargo Screening Program (CCSP) to allow screening to take place earlier in the shipping process, prior to delivering the cargo to the air carrier. Under the CCSP, facilities at various points in the air cargo supply chain, such as shippers, manufacturers, warehousing entities, distributors, third-party logistics companies, and freight forwarders that are located in the United States, may voluntarily apply to TSA to become certified cargo screening facilities (CCSF).⁹ TSA initiated the CCSP at 18 U.S. airports that process high volumes of air cargo, and then expanded the program to all U.S. airports in early 2009.

TSA is taking steps to test technologies for screening air cargo. To test select screening technologies among CCSFs, TSA created the Air Cargo Screening Technology Pilot in January 2008, and selected some of the nation's largest freight forwarders to use these technologies and report on their experiences.¹⁰ In a separate effort, in July 2009, DHS's Directorate for Science and Technology completed the Air Cargo Explosives Detection Pilot Program that tested the performance of select baggage screening

⁹A freight forwarder is a company that consolidates cargo from multiple shippers onto a master air waybill—a manifest of the consolidated shipment—and delivers the shipment to air carriers for transport. For the purpose of this statement, the term freight forwarder only includes those freight forwarders that are regulated by TSA, also referred to as indirect air carriers.

¹⁰Initially, the Air Cargo Screening Technology Pilot was limited to high-volume freight forwarders (i.e., freight forwarders processing at least 200 shipments annually per location that contain cargo consolidated from multiple shippers). However, in November 2008, TSA issued a second announcement seeking additional high-volume freight forwarders and independent cargo screening facilities to apply for the pilot.

technologies for use in screening air cargo at three U.S. airports. In March 2009, TSA initiated a qualification process to test these and other technologies for air carriers and CCSP participants to use in meeting the screening mandate against TSA technical requirements. In December 2009, TSA issued to air carriers and CCSFs its first list of qualified technologies which included X-ray and explosives detection systems (EDS) models that the agency approved for screening air cargo under the 9/11 Commission Act. Over the past several years, TSA has evaluated and qualified additional technologies and has issued subsequent lists, most recently in February 2011. These technologies were in addition to the canine and physical search screening methods permitted by TSA.

TSA expanded its explosives detection canine program. As of February 2011, TSA officials stated that the agency had 113 dedicated air cargo screening canine teams—operating in 20 airports—and was in the process of adding 7 additional canine teams. TSA headquarters officials explained that two CCSFs are participating in a pilot program to test the feasibility of using private canine teams—that meet TSA standards—to inspect air cargo. Officials stated that the pilot is expected to continue through summer 2011.

Even with these actions, TSA continues to face challenges that, among other things, could limit the agency’s ability to provide reasonable assurance that screening is being conducted at reported levels. Among the challenges and recommendations previously identified in our June 2010 report are the following.

- **Reported screening data.** TSA does not have a mechanism to verify screening data—which are self-reported by industry representatives. In our June 2010 report, we recommended that TSA develop a mechanism to verify the accuracy of all screening data through random checks or other practical means.¹¹ TSA partially concurred with our recommendation, and stated that verifying the accuracy of domestic screening data will continue to be a challenge because there is no means to cross-reference local screening logs—which include screening information on specific shipments—with screening reports submitted by air carriers to TSA that do not contain such information. Given that the agency uses these data to report to Congress its compliance with the screening mandate as it applies to domestic

¹¹[GAO-10-880T](#).

cargo, we continue to believe that verifying the accuracy of the screening data is important so that TSA will be better positioned to provide reasonable assurance that screening is being conducted at reported levels.

- **Screening technology.** TSA has not approved or qualified any equipment to screen cargo transported on unit-load device (ULD) pallets or containers—both of which are common means of transporting air cargo on wide-body passenger aircraft—both domestic and inbound aircraft.¹² Cargo transported on wide-body passenger aircraft makes up 76 percent of domestic air cargo shipments transported on passenger aircraft. The maximum size cargo configuration that may be screened is a 48-by-48-by-65-inch skid—much smaller than the large pallets that are typically transported on wide-body passenger aircraft. Prior to May 1, 2010, canine screening was the only screening method, other than physical search, approved by TSA to screen such cargo configurations. However, effective May 1, 2010, the agency no longer allows canine teams to screen ULD pallets and containers given TSA concerns about the effectiveness of this screening method for those cargo configurations. In addition, TSA is working to complete qualification testing of additional air cargo screening technologies; thus, until all stages of qualification testing are concluded, the agency may not have reasonable assurance that the technologies that air carriers and program participants are currently allowed to use to screen air cargo are effective. TSA is conducting qualification testing to determine which screening technologies are effective at the same time that air carriers are using these technologies to meet the mandated requirement to screen air cargo transported on passenger aircraft. While we recognize that certain circumstances, such as mandated deadlines, require expedited deployment of technologies, our prior work has shown that programs with immature technologies have experienced significant cost and schedule growth.¹³
- **Inspection resources.** As we reported in June 2010, for domestic air cargo, TSA amended its inspections plan to include inspections of CCSP participants, but the agency had not completed its staffing study

¹² Qualified technologies have undergone a TSA-sponsored test process. Approved technologies are conditionally approved for screening operations for a period of 36 months from the date added to the approved technology list while continuing to undergo further testing for qualification.

¹³ See GAO, *Defense Acquisitions: Measuring the Value of DOD's Weapons Programs Requires Starting with Realistic Baselines*, [GAO-09-543T](#) (Washington, D.C.: Apr. 1, 2009).

to determine how many inspectors will be necessary to provide oversight of the additional program participants that would support the screening mandate. In our June 2010 report, we recommended that TSA create milestones to help ensure completion of the staffing study. TSA concurred and stated that as part of the staffing study, the agency is working to develop a model to identify the number of required transportation security inspectors and that this effort would be completed in the fall of 2010. As of February 2011, TSA officials stated that the study was in the final stages of review.

TSA Has Taken Steps to Enhance the Security of Inbound Air Cargo, but Previously Identified Screening Data Limitations and Other Challenges Persist

TSA has taken a number of steps to enhance the security of inbound air cargo, as discussed below.

TSA moved its deadline for meeting the 100 percent screening mandate as it applies to inbound air cargo. TSA officials stated that they plan to meet the 9/11 Commission Act mandate as it applies to inbound air cargo transported on passenger aircraft by December 2011—2 years earlier than the TSA administrator reported to Congress in November 2010. According to TSA officials, the agency determined it was feasible to require air carriers to meet a December 2011 screening deadline as a result of trends in carrier reported screening data and discussions with air cargo industry leaders regarding progress made by industry to secure inbound cargo on passenger aircraft.

Effective May 1, 2010, air carriers were required to submit inbound screening data to TSA. According to TSA officials, in analyzing this self-reported screening data, TSA found that carriers were screening a higher percentage of air cargo than TSA had initially estimated. For example, TSA previously estimated that 65 percent of inbound cargo by weight would be screened by August 2010. Based on data submitted to TSA by the air carriers, TSA officials stated that the agency estimates that about 80 percent of inbound cargo by weight was screened for the same time period. In addition to requiring air carriers to submit screening data to TSA, in May 2010, TSA also required air carriers to screen a certain percentage of shrink-wrapped and banded inbound cargo.¹⁴ TSA officials stated that in implementing this requirement, air carriers determined that

¹⁴Details on TSA's screening requirements are Sensitive Security Information and are not discussed in this statement. Banded cargo is cargo with heavy-duty metal, plastic, or nylon bands that secure all sides of the cargo shipment or secure the cargo shipment to a skid.

it was more efficient to screen larger groupings of cargo at the point of origin, which resulted in more than the required percentage being screened. Therefore, according to TSA officials, continued progress made by industry will help TSA to meet its December 31, 2011, deadline to screen 100 percent of inbound passenger cargo.

TSA is working with foreign governments to draft international air cargo security standards and to harmonize standards with foreign partners.¹⁵ According to TSA officials, the agency has worked with foreign counterparts over the last 3 years to draft Amendment 12 to the International Civil Aviation Organization's (ICAO) Annex 17, and to generate support for its adoption by ICAO members. The amendment, which was adopted by the ICAO Council in November 2010, will set forth new standards related to air cargo such as requiring members to establish a system to secure the air cargo supply chain (the flow of goods from manufacturers to retailers). TSA has also supported the International Air Transport Association's (IATA) efforts to establish a secure supply chain approach to screening cargo for its member airlines and to have these standards recognized internationally. Moreover, following the October 2010 bomb attempt in cargo originating in Yemen, DHS and TSA, among other things, reached out to international partners, IATA, and the international shipping industry to emphasize the global nature of transportation security threats and the need to strengthen air cargo security through enhanced screening and preventative measures. TSA also deployed a team of security inspectors to Yemen to provide that country's government with assistance and guidance on their air cargo screening procedures.

In November 2010, TSA officials stated that the agency is coordinating with foreign countries to evaluate the comparability of their air cargo security requirements with those of the United States. According to TSA officials, the agency has developed a program, the National Cargo Security Program (NCSP), that would recognize the air cargo security programs of foreign countries if TSA deems those programs provide a level of security commensurate with TSA's programs. TSA plans to coordinate with the top 20 air cargo volume countries, which, according to TSA officials, export about 90 percent of the air cargo transported to the United States on

¹⁵Harmonization, as defined by DHS, refers to countries' efforts to coordinate their security standards and practices to enhance security as well as the mutual recognition and acceptance of existing security standards and practices aimed at achieving the same security outcome.

passenger aircraft. According to officials, TSA has completed a review of one country's air cargo security program and has determined that its requirements are commensurate with those of the United States. TSA considers air carriers adhering to NCSP approved programs as being in compliance with TSA air cargo security requirements, according to TSA officials. As of February 2011, TSA continues to evaluate the comparability of air cargo security programs for several other countries. TSA officials stated that although the December 31, 2011, deadline to achieve 100 percent screening is independent of this effort, the agency plans to recognize as many commensurate programs as possible by the deadline.

TSA implemented additional security measures following the October 2010 Yemen air cargo bomb attempt. On November 8, 2010, DHS announced security measures in response to the Yemen incident. TSA banned cargo originating from Yemen and Somalia from transport into the United States; banned the transport of cargo deemed high risk on passenger aircraft; prohibited the transport of toner and ink cartridges weighing 16 ounces or more on passenger aircraft in carry-on and checked luggage; and required additional screening of high-risk cargo prior to transport on an all-cargo aircraft. In addition, TSA is working closely with CBP, industry and international partners to expedite the receipt of advanced cargo data for international flights to the United States prior to departure in order to more effectively identify and screen items based on risk and current intelligence. Further, in December 2010, TSA, CBP, and the air cargo industry launched a new joint technology pilot project referred to as the air cargo advance screening program to enhance the sharing of electronic shipping information to improve the identification of high-risk cargo. In February 2011, TSA officials stated that this effort is currently focused on all-cargo carriers and will expand to passenger carriers in the future.

Even with these steps to improve the security of inbound air cargo, as we previously reported in June 2010, TSA faces challenges that could hinder its ability to meet the 9/11 Commission Act screening mandate as it applies to inbound cargo.

TSA lacks a mechanism to verify data on screening conducted on inbound air cargo. As we reported in June 2010, questions exist about the reliability of TSA's reported screening data for inbound cargo because TSA does not have a mechanism to verify the accuracy of the data reported by industry. In June 2010, we reported that TSA's screening percentages were estimated based on screening requirements of certain countries and were not based on actual data collected from air carriers or

other entities, such as foreign governments. In this report, we recommended that TSA develop a mechanism to verify the accuracy of all screening data through random checks or other practical means and obtain actual data on all inbound screening. TSA concurred in part with our recommendation and issued changes to air carriers' standard security programs that required air carriers to report inbound cargo screening data to TSA. However, these requirements apply to air carriers and the screening that they conduct or that may be conducted by a foreign government, but does not reflect screening conducted by other entities throughout the air cargo supply chain. As of March 2011, TSA officials stated that current screening percentages are based on actual data reported by air carriers, but stated that it is difficult to verify the accuracy of the screening data reported by air carriers. Given that TSA now plans to meet the 9/11 Commission Act screening mandate as it applies to inbound air cargo by December 2011, it will be important for TSA to have complete and accurate data in hand to verify that this mandate is being met.

TSA has limited authority to regulate foreign governments or entities. TSA may require that foreign air carriers with operations to, from, or within the United States comply with any applicable requirements, including TSA-issued emergency amendments to air carrier security programs, but foreign countries, as sovereign nations, generally cannot be compelled to implement specific aviation security standards or mutually accept other countries' security measures. International representatives have noted that national sovereignty concerns limit the influence the United States and its foreign partners can have in persuading any country to participate in international harmonization efforts, or make specific changes in their screening procedures. Thus, TSA authority abroad is generally limited to regulating air carrier operations, including the transport of cargo, into the United States. It has no other authority to require foreign governments or entities to, for example, screen a certain percentage of air cargo or screen cargo using specific procedures.

No technology is currently approved or qualified by TSA to screen cargo once it is loaded onto a unit-load device. As we noted earlier for domestic air cargo, TSA has not approved any equipment to screen cargo transported on unit-load device (ULD) pallets or containers—both of which are common means of transporting air cargo on wide-body passenger aircraft—on both domestic and inbound aircraft. As a result, questions remain about air carriers' ability to effectively and efficiently screen air cargo bound for the United States. This is particularly important because, as we reported in June 2010, about 96 percent of inbound air cargo arrives on wide-body aircraft, and TSA has limited authority to

oversee the screening activities of foreign governments or entities. We will be examining these issues as part of our ongoing review of TSA's efforts to secure inbound air cargo for the House Committee on Homeland Security and Senate Committee on Homeland Security and Governmental Affairs. We plan to issue the final results later this year.

Mr. Chairman, this concludes my statement. I look forward to answering any questions that you or other members of the subcommittee may have.

For questions about this statement, please contact Stephen M. Lord at (202) 512-4379 or lords@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. Individuals making key contributions to this testimony are Steve D. Morris, Assistant Director; Joel Aldape; Carissa Bryant; Labony Chakraborty; Tom Lombardi; Linda S. Miller; Rebecca Kuhlman Taylor; and Meg Ullengren.

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