



**UNITED STATES DEPARTMENT OF COMMERCE**  
**Chief Financial Officer and**  
**Assistant Secretary for Administration**  
Washington, D.C. 20230

May 18, 2016

Mr. Carl Malamud  
President & CEO  
Public.Resource.Org  
1005 Gravenstein Highway North  
Sebastopol, California 95472

RE: Freedom of Information Act Request DOC-OS-2015-001701

Dear Mr. Malamud:

This is a final response to your Freedom of Information Act request dated, July 22, 2015, requesting, "any records concerning the participation of Ms. Saunders on the boards of ANSI and ASTM International".

After our search, we have located the enclosed responsive documents that we are releasing to you in their entirety.

Sincerely,

***Bobbie Parsons***

Bobbie Parsons  
FOIA Officer, Immediate Office of the Secretary  
Office of Privacy and Open Government

document title: G:\Admin\AGC-ADM\GROUP\Ethics Division\WJacobi\Off-Act\saunders ANSI.wpd

prepared by: Will Jacobi

cc: B Fredericks/Chron

D Maggi

W Jacobi

January 20, 2016

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Ethics

file number: 0812-48

Addressee: Mary Saunders

Date: December 9, 2008

Prepared by: Will Jacobi /s/ 12/09/08

Agency: NIST

File categories: off-act

description: .....

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Advised that Mary Saunders, NIST, that she may continue to serve on the ANSI board of directors in her official capacity when she transfers to ITA provided that she receives approval from ITA senior management and she limits her board duties to standards-setting activities. Service in an official capacity is permissible because ANSI is a standards-setting organization. Set forth below is the e-mail.

**From:** Jacobi, William **Sent:** Tuesday, December 09, 2008 4:03 PM **To:** Saunders, Mary **Subject:** RE: Serving on ANSI Board

Mary-

This is in response to your request for guidance concerning service on the American National Standards Institute (ANSI) board of directors. As explained below, you may continue to serve on the board as an ITA employee provided that you receive supervisory approval and subject to certain restrictions.

You currently serve as a division chief at the National Institute for Standards and Technology (NIST) and you serve in your official NIST capacity as chair of ANSI's International Policy Committee (IPC). As IPC chair, you are an ex-officio member of the ANSI board of directors. You indicated that ANSI is a standards-setting organization.

You have been selected for an SES position as the Deputy Assistant Secretary for Manufacturing and Services (M&S), International Trade Administration (ITA). You ask whether you may continue to serve in your official capacity as IPC chair (and—by virtue of the IPC position—on the ANSI board) as an ITA employee. You indicated that neither the MOU between NIST and ANSI nor the ANSI bylaws requires a NIST employee to serve as the IPC chair. In addition, there is no requirement that any NIST official serve on the ANSI board of directors.

Under a conflict of interest statute, a Federal employee is barred from serving in her official capacity as an officer or director of a non-Governmental entity, absent statutory authority. If the proposed service is with a standards-setting organization, the statutory authority may be general, such as an indication of congressional intent that the Government be involved in the development of the standards. However, the position the employee proposes to hold with the organization must itself have standards-setting duties.

Accordingly, because ANSI is a standards-setting organization, you may serve on the board, subject to the following conditions and limitations.

Your service as the IPC chair and on the ANSI board of directors in your official capacity will be proper if: you receive explicit authorization from ITA senior management to undertake this service as part of your official duties and you limit your participation to standards-setting activities in which ITA has an interest. For example, ITA would generally not have an interest in ANSI administrative issues (e.g., budget or personnel). In addition, you may only represent the agency's views and opinions, rather than any personal views you may have, in your service with ANSI (note that this restriction would bar you from representing the views of membership).

When seeking approval from ITA management to undertake this service with ANSI, you should also seek explicit approval to communicate with Federal officials on behalf of ANSI if there is an ITA interest in such contacts. A Federal law prohibits an Executive Branch employee, when acting in her personal capacity, from representing another person or organization before a Federal agency or court in a matter in which the United States has an interest. Therefore, we recommend that if your responsibilities as an ANSI board member are likely to require you to work with Federal agencies, the authorization from ITA approving your ANSI service should clearly authorize you to contact Federal agencies as part of your ITA approved assignment.

If approved, because you will be serving with ANSI in your official capacity, you may use official time and agency resources to carry out your ANSI responsibilities. If your responsibilities require travel to ANSI functions, you should do so on official travel orders. The Government is responsible for paying your travel expenses, subject to normal *per diem* and other limits. If ANSI offers to pay your travel expenses, such payment would be considered a travel gift to ITA and may only be accepted if it was not solicited and if acceptance would not create an appearance problem. We can advise you specifically on such an offer should the issue arise.

If you have any questions concerning this guidance, please contact me.

Document title: G:\Admin\AGC-ADM\GROUP\Ethics Division\RSwayze\Outside Activities and Non-Federal Employment\097-181 (Saunders, Board of ASTM).wpd

prepared by: Reid Swayze

cc: B Fredericks/ Chron /s/ 8/4/09

D Maggi

R Swayze

January 20, 2016

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Ethics

file number: 097-181

Addressee: Mary Saunders

Date: July 28, 2009

Prepared by: Reid Swayze

Agency: ITA

File categories:official activities

description: .....

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Mary Saunders, Acting Assistant Secretary for Manufacturing and Services (MAS), ITA, contacted this office regarding whether she may serve on the Board of Directors for the American Society for Testing and Materials (ASTM) in her official capacity. The ASTM engages in over 12,000 international and domestic standard-setting activities, and, as a member of the Board, under the Society's bylaws, Ms. Saunders would be directly involved in such standard-setting activities.

Through its interpretation of 18 U.S.C. § 208, the United States Department of Justice has determined that it is an inherent conflict of interest for a Government employee to serve as an officer or board member with a non-Federal organization her official capacity unless fiduciary obligations to the organization are released, such service is authorized by a specific statute, or unless the organization is engaged in standard-setting activities and the employee will be directly involved in such standard-setting activities—in which case, the statutory authority may be general. *See 22 Op. Off. Legal Counsel 210 (1998).*

Because the ASTM is a standard-setting organization and Ms. Saunders, as a member of the Board, will be directly involved in the Society's standard-setting activities, she was advised that she could serve on the Board in her official capacity—provided that a senior level ITA official determined that such an official relationship would benefit the agency—without creating a conflict of interest under 18 U.S.C. § 208. Additionally, if approved as an official activity, Ms. Saunders was also advised that she should use Government resources—including duty hours and her official title—in connection with her service to the Society and that her communications to the organization should be made in her official capacity on behalf of ITA. The text of the guidance e-mail follows below.

**From:** Swayze, Reid **Sent:** Tuesday, July 21, 2009 13:43**To:** 'Mary Saunders'**Subject:** RE: ASTM board nomination materials

Dear Mary,

Thank you for sending me this information regarding your prospective service on the American Society for Testing and Materials (ASTM) Board of Directors in your official capacity as the Acting Assistant Secretary and Deputy Assistant Secretary for MAS.

As I mentioned before, the Department of Justice has determined that it is an inherent conflict of interest for a Government employee to serve as an officer with a non-Federal organization in her official capacity unless authorized by a specific statute or unless the organization engages in standard-setting activities—in which case, the statutory authority may be general—and the employee herself will directly engage in such standard-setting activities.

The *raison d'être* of the ASTM is to engage in over 12,000 international standard-setting activities involving metals, petroleum, construction, and the environment (among other things); additionally, as a member of the Board, you will be directly involved in the administration of the organization's standard-setting activities. On these grounds, my office has determined that your service on the Board, in your official capacity, is supported by general statutory authority and will not create an inherent conflict of interest; accordingly, you may engage in this activity provided that Michelle O'Neill, as your supervisor, determines that such an official relationship between ITA and the ASTM will benefit your agency. Please note that, if approved as an official activity, you should use Government resources—including your official title and duty hours—in connection with your service to the Board and that your communications to the Board and the organization should be made on behalf of ITA.

If you have any questions regarding this guidance, please do not hesitate to contact me.

v/r

Reid

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Reid Perry Swayze  
Attorney-Advisor  
Office of the General Counsel  
Ethics Law and Programs Division  
(202) 482-4044

Document title: G:\Admin\AGC-ADM\GROUP\Ethics Division\KMahne\Gifts-Travel\1010-278  
Saunders (ASTM Board of Directors Meeting).doc

prepared by: Kevin Mahne

cc: B Fredericks/Chron

D Maggi

K Mahne

October 27, 2010

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Ethics

File number: 1010-278

Addressee: Twanna Duncan for Mary Saunders

Date: October 15, 2010

Prepared by: Kevin Mahne

Agency: ITA

File categories: gifts, travel

Description: .....

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TRAVEL GIFT

Advice provided: Travel gift may be accepted

Employee: Mary Saunders

Position/Office: Deputy Assistant Secretary for Market Access and Compliance,  
International Trade Administration

Event: ASTM International Board of Directors' Meeting

Location: West Conshohocken, Pennsylvania

Sponsor: ASTM International

Type of travel gift: mileage, parking, tolls, lodging

Value: \$520

Analysis: This is an unsolicited travel gift (mileage, parking, tolls, lodging) from  
ASTM International for Mary Saunders to speak at the Board of Directors'  
meeting in West Conshohocken, Pennsylvania on October 25-27, 2010.

ASTM International is a large voluntary standards development organization  
and a trusted source for technical standards for materials, products, systems,  
and services. ASTM International standards guide design, manufacturing,  
and trade in the global economy.

Acceptance of this travel gift by the International Trade Administration  
(ITA) is consistent with ethics regulations and Department policy regarding  
accepting travel gifts. ASTM International is a non-Federal source; the  
travel gift was not solicited; the travel gift was not given in exchange for  
goods or services to be provided to the donor; Ms. Saunders' supervisor  
approved her speaking at the event to discuss ITA's perspective on the  
importance of international standards to competitiveness; and ASTM  
International does not have any contracts, grants, or controversial matters

before ITA that would cause a reasonable person to question the integrity of agency programs or operations. 31 U.S.C. § 1353; *see also* DAO 203-9.

I advised Ms. Duncan that ITA may accept this travel gift and if accepted, the travel gift must be reported on a CD-210.

The e-mail advice provided is below.

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**From:** Mahne, Kevin  
**Sent:** Thursday, October 21, 2010 9:06 AM  
**To:** Duncan, Twanna  
**Subject:** ASTM Int'l Board of Directors Meeting  
Ms. Duncan,

This e-mail responds to your question regarding whether Mary Saunders may accept a travel gift (mileage, parking, lodging, tolls) from ASTM International to attend its Board of Directors' meeting in West Conshohocken, Pennsylvania on October 25-27, 2010. As discussed below, the International Trade Administration may accept this travel gift.

The Department may accept a travel gift for an employee to attend a meeting or other similar function if acceptance of the travel gift would not cause a reasonable person to question the integrity of agency operations. To avoid appearance concerns, the Department generally will not accept a travel gift from entities with contracts, grants, or controversial matters pending before the agency of the employee. In this instance, the ASTM International is a non-Federal source; the gift was not solicited; Ms. Saunders' supervisor determined that her attendance and speaking at the meeting supports an International Trade Administration (ITA) mission; and ASTM International does not have any contracts, grants, or controversial matters before ITA. Therefore, acceptance of the travel gift is consistent with regulations and policy. If accepted, the travel gift must be reported on a CD-210.

Please contact me via e-mail or at the telephone number below if you have any questions regarding this guidance.

Best regards,

**Kevin P. Mahne**  
Attorney-Advisor  
U.S. Department of Commerce  
Ethics Law and Programs Division  
202-482-5395  
Herbert C. Hoover Building  
Room: 5709

**Confidentiality Notice:** This e-mail message is intended only for the named recipients. It contains information that may be confidential, privileged, attorney work product, or otherwise exempt from disclosure under applicable law. If you have received this message in error, are not a named recipient, or are not the employee or agent responsible for delivering this message to a named recipient, be advised that any review, disclosure, use, dissemination, distribution, or reproduction of this message or its contents is strictly prohibited. Please notify us immediately that you have received this message in error, and delete the message.

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**From:** Twanna Duncan [mailto:Twanna.Duncan@trade.gov]  
**Sent:** Friday, October 15, 2010 3:00 PM  
**To:** Division, Ethics  
**Subject:** Gift and Bequest for Mary Saunders to travel to West Conshohocken, PA; October 25-27, 2010  
**Importance:** High

1. Mary Saunders, Deputy Assistant Secretary for MAS, ITA
2. ASTM International Board of Directors Meeting
3. ASTM
4. POV Mileage, and Lodging
5. Approximately \$520.00
6. No
7. West Conshohocken, PA
8. October 25-27, 2010
9. Ms. Saunders will provide ITA perspective on ASTM standards policy priorities, programs and activities that address international trade issues. She will share with conference participants an ITA perspective on international standards and competitiveness.
10. Yes
11. I've copied your office on the email to Yancey
12. I've copied your office on the email to Beverly
13. Not that I am aware of
14. Not that I am aware of

If you have any questions on this request, please contact me at the telephone number below or via email at [Twanna.duncan@trade.gov](mailto:Twanna.duncan@trade.gov)

Thanks for your help with this request.

*Twanna L. Duncan*  
 Administrative Specialist  
 Office of the Assistant Secretary  
 for Manufacturing and Services  
 International Trade Administration  
 US Department of Commerce  
 14th & Constitution Avenue, NW  
 Room 3832-HCHB  
 Washington, DC 20230  
 202-482-1465 office  
 202-482-5697 fax



**Mahne, Kevin**

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**From:** Mahne, Kevin  
**Sent:** Thursday, October 21, 2010 9:06 AM  
**To:** Duncan, Twanna  
**Subject:** ASTM Int'l Board of Directors Meeting

Ms. Duncan,

This e-mail responds to your question regarding whether Mary Saunders may accept a travel gift (mileage, parking, lodging, tolls) from ASTM International to attend its Board of Directors' meeting in West Conshohocken, Pennsylvania on October 25-27, 2010. As discussed below, the International Trade Administration may accept this travel gift.

The Department may accept a travel gift for an employee to attend a meeting or other similar function if acceptance of the travel gift would not cause a reasonable person to question the integrity of agency operations. To avoid appearance concerns, the Department generally will not accept a travel gift from entities with contracts, grants, or controversial matters pending before the agency of the employee. In this instance, the ASTM International is a non-Federal source; the gift was not solicited; Ms. Saunders' supervisor determined that her attendance and speaking at the meeting supports an International Trade Administration (ITA) mission; and ASTM International does not have any contracts, grants, or controversial matters before ITA. Therefore, acceptance of the travel gift is consistent with regulations and policy. If accepted, the travel gift must be reported on a CD-210.

Please contact me via e-mail or at the telephone number below if you have any questions regarding this guidance.

Best regards,

**Kevin P. Mahne**  
Attorney-Advisor  
U.S. Department of Commerce  
Ethics Law and Programs Division  
202-482-5395  
Herbert C. Hoover Building  
Room: 5709

**Confidentiality Notice:** This e-mail message is intended only for the named recipients. It contains information that may be confidential, privileged, attorney work product, or otherwise exempt from disclosure under applicable law. If you have received this message in error, are not a named recipient, or are not the employee or agent responsible for delivering this message to a named recipient, be advised that any review, disclosure, use, dissemination, distribution, or reproduction of this message or its contents is strictly prohibited. Please notify us immediately that you have received this message in error, and delete the message.

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**From:** Twanna Duncan [mailto:Twanna.Duncan@trade.gov]  
**Sent:** Friday, October 15, 2010 3:00 PM  
**To:** Division, Ethics  
**Subject:** Gift and Bequest for Mary Saunders to travel to West Conshohocken, PA; October 25-27, 2010  
**Importance:** High

10/21/2010

1. Mary Saunders, Deputy Assistant Secretary for MAS, ITA
2. ASTM International Board of Directors Meeting
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8. October 25-27, 2010
9. Ms. Saunders will provide ITA perspective on ASTM standards policy priorities, programs and activities that address international trade issues. She will share with conference participants an ITA perspective on international standards and competitiveness.
10. Yes
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13. Not that I am aware of
14. Not that I am aware of

If you have any questions on this request, please contact me at the telephone number below or via email at [Twanna.duncan@trade.gov](mailto:Twanna.duncan@trade.gov)

Thanks for your help with this request.

*Twanna L. Duncan*  
Administrative Specialist  
Office of the Assistant Secretary  
for Manufacturing and Services  
International Trade Administration  
US Department of Commerce  
14th & Constitution Avenue, NW  
Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5697 fax

**Mahne, Kevin**

**From:** Twanna Duncan [Twanna.Duncan@trade.gov]  
**Sent:** Friday, October 15, 2010 3:00 PM  
**To:** Division, Ethics  
**Subject:** Gift and Bequest for Mary Saunders to travel to West Conshohocken, PA; October 25-27, 2010  
**Importance:** High  
**Attachments:** Saunders.pdf

1. Mary Saunders, Deputy Assistant Secretary for MAS, ITA
2. ASTM International Board of Directors Meeting
3. ASTM
4. POV Mileage, and Lodging
5. Approximately \$520.00
6. No
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If you have any questions on this request, please contact me at the telephone number below or via email at [Twanna.duncan@trade.gov](mailto:Twanna.duncan@trade.gov)

Thanks for your help with this request.

*Twanna L. Duncan*  
 Administrative Specialist  
 Office of the Assistant Secretary  
 for Manufacturing and Services  
 International Trade Administration  
 US Department of Commerce  
 14th & Constitution Avenue, NW  
 Room 3832-HCHB  
 Washington, DC 20230

202-482-1465 office  
 202-482-5697 fax

*Mary Saunders*  
 ITA  
 Travel G.f.f from  
 ASTM International  
 Please assign to Kevin  
 Received 10/15/10  
 Replied 10/21/10



**INTERNATIONAL**  
Standards Worldwide

**Office of the President**

Address 100 Barr Harbor Drive  
PO Box C700  
W. Conshohocken, PA  
19428-2959 | USA

Phone 610.832.9500  
Fax 610.832.9555  
e-mail [jthomas@astm.org](mailto:jthomas@astm.org)  
Web [www.astm.org](http://www.astm.org)

October 15, 2010

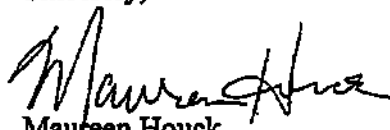
Mary H. Saunders  
U.S. Department of Commerce  
Herbert C. Hoover Bldg. - Rm 3832  
1401 Constitution Ave, N.W.  
Washington, DC 20230

Dear Ms. Saunders:

ASTM is inviting you to attend and participate at the ASTM International Board of Directors meeting on October 25-27, 2010 at ASTM Headquarters in West Conshohocken, PA. ASTM has agreed to reimburse you for expenses incurred during your trip for ground transportation (tolls, parking, and mileage at 50 cents per mile for a privately owned vehicle) and hotel (approximately \$375.00).

We appreciate and thank you for your participation in this important meeting.

Sincerely,

  
Maureen Houck  
Assistant to the President

**Mahne, Kevin**

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**From:** Twanna Duncan [Twanna.Duncan@trade.gov]  
**Sent:** Friday, October 15, 2010 2:57 PM  
**To:** Division, Ethics  
**Subject:** FW: Contracts - ASTM International

This office is requesting gift and bequest permission for Mary Saunders. Please see email below.

*Twanna L. Duncan*  
Administrative Specialist  
Office of the Assistant Secretary  
for Manufacturing and Services  
International Trade Administration  
US Department of Commerce  
14th & Constitution Avenue, NW  
Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5697 fax

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**From:** Stern, Yancey [mailto:yStern@doc.gov]  
**Sent:** Friday, October 15, 2010 10:27 AM  
**To:** Twanna Duncan  
**Subject:** RE: Contracts - ASTM International

I did not find any contracts between ITA and the American Society for Testing and Materials.

*Yancey Stern*  
202-482-5781

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**From:** Twanna Duncan [mailto:Twanna.Duncan@trade.gov]  
**Sent:** Wednesday, October 13, 2010 5:49 PM  
**To:** Stern, Yancey  
**Cc:** Duncan, Twanna  
**Subject:** Contracts - ASTM International  
**Importance:** High

Good Afternoon,

Mary Saunders will be traveling to West Conshohocken, PA, October 25-27, 2010. The travel will need gift and request approval. Please let me know if American Society for Testing and Materials (ASTM) International has contracts with International Trade Administration (ITA).

Thanks,  
Twanna

*Twanna L. Duncan*  
Administrative Specialist  
Office of the Assistant Secretary  
for Manufacturing and Services  
International Trade Administration  
US Department of Commerce  
14th & Constitution Avenue, NW  
Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5697 fax

10/15/2010

**Mahne, Kevin**

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**From:** Twanna Duncan [Twanna.Duncan@trade.gov]  
**Sent:** Friday, October 15, 2010 2:57 PM  
**To:** Division, Ethics  
**Subject:** FW: Grants - ASTM International

This office is requesting gift and bequest permission for Mary Saunders. Please see email below.

*Twanna L. Duncan*  
Administrative Specialist  
Office of the Assistant Secretary  
for Manufacturing and Services  
International Trade Administration  
US Department of Commerce  
14th & Constitution Avenue, NW  
Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5697 fax

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**From:** Beverly Manley [mailto:Beverly.Manley@noaa.gov]  
**Sent:** Thursday, October 14, 2010 10:25 AM  
**To:** Twanna Duncan  
**Subject:** RE: Grants - ASTM International

Hello,

The American Society for Testing and Materials (ASTM) International, do have grants with the Department but not with ITA.

^^

*Beverly A. Manley*  
*Grants/Compliance Officer*  
*Grants Management Division*  
*U. S. Department of Commerce/NOAA*

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**From:** Twanna Duncan [mailto:Twanna.Duncan@trade.gov]  
**Sent:** Wednesday, October 13, 2010 5:51 PM  
**To:** Beverly Manley  
**Cc:** Twanna Duncan  
**Subject:** Grants - ASTM International  
**Importance:** High

Good Afternoon,

Mary Saunders will be traveling to West Conshohocken, PA, October 25-27, 2010. The traveler will need gift and request approval. Please let me know if American Society for Testing and Materials (ASTM) International has Grants with the International Trade Administration (ITA).

Thanks for your help with this request.

*Twanna L. Duncan*  
Administrative Specialist  
Office of the Assistant Secretary  
for Manufacturing and Services  
International Trade Administration  
US Department of Commerce  
14th & Constitution Avenue, NW  
Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5697 fax

# TELEPHONE NOTES

FOLDER NO. 1010-278

DATE	ATTORNEY/ SPECIALIST	COMMENTS
10/15	B1	Received request via ethics mail
		box for travel starting on
		10/25
		Informed Ms Duncan I would take
		for action.
10/21	B1	Responded via e-mail.
10/26	B1	Assigned file
10/27	B1	Created Macro & pop forwarded
		for review.



Document title: G:\Admin\AGC-ADM\GROUP\Ethics Division\FRuben\Travel Gifts\103-46Saunders(ASTM).wpd

prepared by: Stephanie Dyer and Francisco Ruben

cc: B Fredericks/Chron  
D Maggi  
S Dyer  
F Ruben

March 15, 2010

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Ethics

file number: 103-46  
Addressee: Twanna L. Duncan and Mary Saunders  
Date: March 15, 2010  
Prepared by: Stephanie Dyer and Francisco Ruben  
Agency: ITA  
File categories: gifts  
Description: .....

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**TRAVEL GIFT**

Advice provided: approved  
Employee: Mary Saunders  
Position/office: Deputy Assistant Secretary for MAS, International Trade Administration  
Event: American Society for Testing and Materials International Board of Directors Meeting  
Location: Tokyo, Japan  
Sponsor: American Society for Testing and Materials  
Donor: same  
Type of travel gift: airfare, lodging, meals  
Value: \$9,185.77  
Analysis: This is an unsolicited travel gift from the American Society for Testing and Materials (ASTM) for Mary Saunders to attend the board of directors meeting and provide ITA perspective on ASTM standards, policy priorities, programs and activities that address international trade issues, as well as, international standards and competitiveness from April 12-16, 2010, in Tokyo, Japan. Ms. Saunders serves on the board of directors in her official capacity. See File No. 097-181. ASTM is paying the travel of all members of the board. ASTM is not a lobbying organization. A Federal agency may accept the payment of official travel from a non-Federal source if the travel gift: (1) will aid or facilitate a Department program, policy, or operation; (2) is not being provided in exchange for goods or services to be provided to the donor; and (3) will not cause a reasonable person to question the integrity of agency programs or operations. 15 U.S.C. § 1522; *see also* DAO 203-9. A reasonable person would question the integrity of the agency if the totality of the circumstances indicate that acceptance of a gift would result in an appearance of impropriety. DAO 203-9 § 6.01c. Ms. Saunders' office

indicated that ASTM does not have any contracts or grants with ITA, and that the airfare being offered is at the business class rate. Ms. Saunders may accept business class airfare because other similarly situated invitees are being accorded the same level of benefit. ITA did not solicit the gift, the ASTM is a non-Federal source, and a reasonable person with full knowledge of the relevant facts would not question the Department's integrity in accepting this gift. Therefore, I advised that Ms. Saunders may accept this travel gift pursuant to 41 C.F.R. Part 304-1. I further advised that she must complete a CD-210. Text of e-mail follows.

To: Twanna L. Duncan and Mary Saunders  
From: Francisco Ruben  
Date: March 15, 2010  
Re: Travel Gift from the ASTM

This e-mail responds to your question regarding whether Mary Saunders may accept a travel gift from ASTM to attend the International Board of Directors Meeting from April 12-16, 2010, in Tokyo, Japan. Acceptance of the gift is consistent with applicable legal guidelines and Department policy.

The Department may accept a gift for an employee to attend a meeting or other similar function, if acceptance of the gift would not cause a reasonable person to question the integrity of agency operations. To avoid appearance concerns, the Department does not accept travel payments from contractors, grantees, or entities with controversial matters pending before ITA.

You indicated that ASTM has no contracts, grants, or controversial matters pending before ITA. Additionally, you indicated that Ms. Saunders' supervisor approved her participation in the events. Therefore, acceptance of the gift is consistent with Department policy and applicable regulations. Also, should the Department accept the travel gift, Ms. Saunders should complete a Form CD-210.

If you have a question concerning this guidance, please contact me at [fruben@doc.gov](mailto:fruben@doc.gov) or at 202-482-1596.

Francisco Ruben

**Ruben, Francisco**

**From:** Ruben, Francisco  
**Sent:** Monday, March 15, 2010 2:43 PM  
**To:** Duncan, Twanna; Saunders, Mary  
**Subject:** Travel Gift from ASTM

This e-mail responds to your question regarding whether Mary Saunders may accept a travel gift from the American Society for Testing and Materials to attend the International Board of Directors Meeting from April 12-16, 2010, in Tokyo, Japan. Acceptance of the gift is consistent with applicable legal guidelines and Department policy.

The Department may accept a gift for an employee to attend a meeting or other similar function, if acceptance of the gift would not cause a reasonable person to question the integrity of agency operations. To avoid appearance concerns, the Department does not accept travel payments from contractors, grantees, or entities with controversial matters pending before ITA.

You indicated that ASTM has no contracts, grants, or controversial matters pending before ITA. Additionally, you indicated that Ms. Saunders' supervisor approved her participation in the events. Therefore, acceptance of the gift is consistent with Department policy and applicable regulations. Also, should the Department accept the travel gift, Ms. Saunders should complete a Form CD-210.

If you have a question concerning this guidance, please contact me at [fruben@doc.gov](mailto:fruben@doc.gov) or at 202-482-1596.

Francisco Ruben

Francisco J. Ruben, Senior Attorney  
Ethics Law and Programs Division  
Office of the General Counsel  
U.S. Department of Commerce  
14th Street & Constitution Avenue, NW  
Washington, DC 20230  
Telephone: (202) 482-1596  
Facsimile: (202) 482-0993  
Email: [FRuben@doc.gov](mailto:FRuben@doc.gov)

3/15/2010

**Ruben, Francisco**

---

**From:** Twanna Duncan [Twanna.Duncan@trade.gov]  
**Sent:** Wednesday, March 03, 2010 12:44 PM  
**To:** Ruben, Francisco  
**Subject:** Gift and Bequest for Mary Saunders to travel to Tokyo, Japan; April 12-16, 2010  
**Attachments:** Mary Saunders Tokyo ASTM Board of Directors Meeting 041210.pdf

1. Mary Saunders, Deputy Assistant Secretary for MAS, ITA
2. ASTM International Board of Directors Meeting
3. ASTM
4. Airfare, Lodging, some Meals (see attached)
5. Approximately \$10,000
6. No
7. Tokyo, Japan
8. April 12-16, 2010
9. Ms. Saunders will provide ITA perspective on ASTM standards policy priorities, programs and activities that address international trade issues. She will share with conference participants an ITA perspective on international standards and competitiveness.
10. Yes
11. I've copied you on the email to Yancey
12. I've copied you on the email to Beverly
13. Not that I am aware of
14. Not that I am aware of

If you have any questions on this request, please contact me at the telephone number below or via email at [Twanna.duncan@trade.gov](mailto:Twanna.duncan@trade.gov)

Thanks for your help with this request.

*Twanna L. Duncan*  
Administrative Specialist  
Office of the Assistant Secretary  
for Manufacturing and Services  
International Trade Administration  
US Department of Commerce  
14th & Constitution Avenue, NW  
Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5697 fax

**Ruben, Francisco**

**From:** Twanna Duncan [Twanna.Duncan@trade.gov]  
**Sent:** Wednesday, March 03, 2010 12:37 PM  
**To:** Ruben, Francisco  
**Subject:** FW: Grants - ASTM International; Gift and Bequest for Mary Saunders - Travel to Tokyo, Japan

More information on Mary Saunders travel to Tokyo, Japan; April 12-16, 201

*Twanna L. Duncan*  
Administrative Specialist  
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US Department of Commerce  
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Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5697 fax

**From:** Beverly Manley [mailto:Beverly.Manley@noaa.gov]  
**Sent:** Monday, March 01, 2010 4:46 PM  
**To:** Twanna Duncan  
**Subject:** RE: Grants - ASTM International

Hello,

As of this date, the American Society for Testing and Materials (ASTM) International, does not have any active grants with ITA.

^^

*Beverly A. Manley*  
*Grants Officer*  
*Grants Management Division/NOAA*

**From:** Twanna Duncan [mailto:Twanna.Duncan@trade.gov]  
**Sent:** Monday, March 01, 2010 12:28 PM  
**To:** Beverly Manley  
**Subject:** Grants - ASTM International  
**Importance:** High

Good Afternoon,

Mary Saunders will be traveling to Tokyo, Japan, April 12-16. The traveler will need gift and request approval. Please let me know if American Society for Testing and Materials (ASTM) International has Grants with the International Trade Administration (ITA).

Thanks for your help with this request.

*Twanna L. Duncan*

3/3/2010

Administrative Specialist  
Office of the Assistant Secretary  
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International Trade Administration  
US Department of Commerce  
14th & Constitution Avenue, NW  
Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5697 fax

**Ruben, Francisco**

---

**From:** Twanna Duncan [Twanna.Duncan@trade.gov]  
**Sent:** Wednesday, March 03, 2010 12:36 PM  
**To:** Ruben, Francisco  
**Subject:** FW: Contracts - ASTM International (Mary Saunders - Travel to Japan - April 12-16, 2010)

Hello Francisco,

I will be sending you more information on this request in a few minutes.

*Twanna L. Duncan*  
Administrative Specialist  
Office of the Assistant Secretary  
for Manufacturing and Services  
International Trade Administration  
US Department of Commerce  
14th & Constitution Avenue, NW  
Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5697 fax

---

**From:** Stern, Yancey [mailto:yStern@doc.gov]  
**Sent:** Tuesday, March 02, 2010 10:18 AM  
**To:** Twanna Duncan  
**Subject:** RE: Contracts - ASTM International

We did not find any contracts between ITA and the American Society for Testing and Materials (ASTM) International.

*Yancey Stern*  
202-482-5781

---

**From:** Twanna Duncan [mailto:Twanna.Duncan@trade.gov]  
**Sent:** Monday, March 01, 2010 12:25 PM  
**To:** Stern, Yancey  
**Subject:** Contracts - ASTM International  
**Importance:** High

Good Afternoon,

Mary Saunders will be traveling to Tokyo, Japan, April 12-16. The travel will need gift and request approval. Please let me know if American Society for Testing and Materials (ASTM) International has contracts with International Trade Administration (ITA).

*Twanna L. Duncan*  
Administrative Specialist  
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3/3/2010



Hello Everyone,

We are getting close to the ASTM International Board of Directors meeting in Tokyo and I thought it would be helpful to provide a few reminders and additional information on the arrangements.

**Transportation:**

Many of you are scheduled on the same flights from the USA. I am attaching a copy of the flight arrangements so you will know who is on your flight.

The Airport Limousine Bus has a ticket desk located in the baggage claim area at Narita's International Airport. This is the Mandarin Oriental Tokyo hotel's recommended airport transport and the bus stops at the hotel. Travel time can take up to 90 minutes depending on traffic conditions. Tickets cost JPY 3,000 and they accept credit cards.

Please be aware that taking a taxi from Narita Airport directly to the Mandarin Oriental Hotel costs JPY 25,000 (approximately \$280 USD).

For your return trip to the airport, the hotel concierge will make a reservation for you upon request.

**Hotel:**

Mandarin Oriental Tokyo  
2-1-1, Nihonbashi Muromachi  
Chuo-ku, Tokyo 103-8328 Japan  
Telephone: +81 (3) 3270-8800  
Facsimile: +81 (3) 3270 8828  
www.mandarinoriental.com  
Hotel check in time: 3:00 pm

Hotel check out time: 12 Noon

The hotel has wireless internet access if you plan to bring your laptop. You log on in your guest room with a special access code you receive at check in. The internet cost per room each day is JPY 1,800 (approximately \$20 USD). Please note the meeting rooms will not have wireless internet access.



**All room reservations have been designated as non-smoking. If you prefer to be assigned a smoking room please notify me soon to make the change (bschultz@astm.org)**

Confirmation numbers for your room reservation will be sent in the near future.

If using a taxi from the hotel, they will write your destination in Japanese for the taxi driver. The hotel desk will also provide you with a card showing their address in Japanese for your return to the hotel. Most taxi drivers do not speak English. Also, seatbelts must always be fastened.

Arrangements for your room include a western breakfast buffet each morning in the K'shik restaurant on the hotel's 37<sup>th</sup> floor.

Your room and tax will be billed to ASTM and you need only to pay for your incidental charges at check out. Additionally, if you are arriving before Saturday, April 10 and staying later than Friday, April 16 you will need to provide the hotel with a credit card to cover your pre and post stay expenses.

**Tokyo City Tour      Sunday, April 11      9:00 am – 1:00 pm**  
**Meet in the hotel's ground floor lobby at 8:50am.**

A tour has been arranged for us to see the highlights of Tokyo on Sunday morning. Tour highlights include a visit to the Imperial Palace East Garden, Asakusa and Nakamise and the Meiji Jingu Shrine. For those that want to shop or have lunch on the Omotesando Shopping Street, you can stay and return to the hotel on your own schedule. The bus will return to the hotel approximately 1:00 pm.

Sunday afternoon is free time.

### **Evening Events**

All spouses and guests are invited to the planned dinners Sunday through Wednesday.

#### **Sunday, April 11**

Welcome Reception - 6:00 pm – 8:00 pm  
Linden Room – Mitsui Main Building – 3<sup>rd</sup> Floor

Cocktails, food stations and a chance to visit before the busy schedule begins.  
Business casual attire is acceptable for this reception.

#### **Monday, April 12**

Reception and dinner at Happo-en. Reception is 7:00 pm and dinner is 8:00 pm. Meet in the hotel ground floor lobby at 6:20 pm for a **prompt** departure at 6:30 pm.  
(Please note the short time between the Workshop Reception, 5:00pm-6:00pm, and the departure time for the Board Reception)

Happo-en is set in a beautiful Japanese garden with a sit down dinner, western style seating. ASTM will have invited guests at this event. Buses will return to the hotel at the completion of the dinner.

### **Tuesday, April 13**

Reception and dinner at Roppongi Hills Club, 51<sup>st</sup> floor of the Roppongi Hills Mori Tower.  
Reception is 6:30pm, dinner at 7:30pm.  
Meet in the hotel ground floor lobby at 5:50 pm for a **prompt** departure at 6:00 pm.

Roppongi Hills Club has stunning views of the city of Tokyo. This will be a sit down dinner with western style seating. We will have many Japanese guests and most will be participating in your visits the following day.

Buses return to the hotel at the conclusion of the dinner.

### **Wednesday, April 14**

Reception and dinner at the XEX Tokyo Restaurant. 7:00 pm  
Meet in the hotel ground floor lobby at 6:40 pm for a departure at 6:50 pm.  
This is an Italian Restaurant connected to Tokyo Station with views of the Imperial Palace. Western style seating.  
Busses return to the hotel at the conclusion of the dinner.

### **Thursday, April 15**

No planned event. Restaurant suggestions will be available at the meeting.

### **Food allergies / vegetarian meals.**

I have not had any responses regarding food allergies or requests for vegetarian meals. It's not too late if you want to let me know.

### **Spouses/Guests (please share this with your spouse/guest)**

In addition to Sunday's tour, we have planned a tour for you on Monday and Tuesday. Wednesday is free time to spend as you wish. Please note that many are leaving after the Thursday morning Board meeting; therefore, spouses are welcome to join the Board for lunch in the Adler Room.

### **Monday Tour: April 12<sup>th</sup>**

Cultural Experience in Bonsai Garden: 9:00 am – 3:45 pm  
Please meet in the hotel ground floor lobby at 8:45 am.

The tour starts with a visit to the SHUNKAEN Bonsai Garden and includes a lesson in calligraphy, kimono dressing, tea ceremony and furosiki wrapping.

Next stop is to Ginza with lunch at the Ganka Restaurant. You will have free time to explore the shops on Ginza Street. The bus will return to the hotel at 3:45pm.

### **Tuesday Tour: April 13<sup>th</sup>**

Museum Tour: 9:45 am – 3:30 pm  
Please meet in the hotel ground floor lobby at 9:30 am.

The morning will be spent in the Tokyo National Museum with lunch following at Gonpachi Nishiazabu. Next will be a visit to Midtown with interesting shops and art on each corner. There is free time to explore this exciting area. The bus returns to the hotel at 3:30 pm.

Wednesday, April 14<sup>th</sup> is a day to relax or shop. There are no planned tours.

Thursday, April 15<sup>th</sup>. Half of the group is departing at the conclusion of the meeting and final Board lunch. If you are in the hotel, please feel free to join us.

### **Board Photograph**

A group photo of the Board of Directors will be taken on Tuesday, April 13<sup>th</sup> during the morning break. Please remember to wear dark clothing on this day.

### **Tipping**

It is not necessary to tip, even in restaurants as a service charge is always included in the overall bill.

### **Dress Code**

All meetings and evening events are business attire. The exceptions are the Sunday Group tour – please be comfortable. Also, the opening welcome reception on Sunday is business casual.

### **My contact information**

I will be arriving in Tokyo on Thursday evening, April 8. If you need to reach me, my email is [bschultz@astm.org](mailto:bschultz@astm.org).

If you have any questions about the arrangements thus far, please feel free to contact me.

Sincerely,

Betty J. Schultz  
ASTM Director of Meetings  
[bschultz@astm.org](mailto:bschultz@astm.org)  
610-832-9701

Attachment: Airline reservation schedule

**Dyer, Stephanie**

---

**From:** Twanna Duncan [Twanna.Duncan@trade.gov]  
**Sent:** Monday, March 15, 2010 11:39 AM  
**To:** Dyer, Stephanie  
**Subject:** Mary Saunders Gift and Bequest Information

Per our discussion, here is the information you requested:

Airfare: \$6,853.37  
Lodging: \$2,332.40 (\$583.10 per night)  
Total: \$9,185.77

*Twanna L. Duncan*  
Administrative Specialist  
Office of the Assistant Secretary  
for Manufacturing and Services  
International Trade Administration  
US Department of Commerce  
14th & Constitution Avenue, NW  
Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5697 fax

**Dyer, Stephanie**

---

**From:** Twanna Duncan [Twanna.Duncan@trade.gov]  
**Sent:** Monday, March 15, 2010 12:00 PM  
**To:** Dyer, Stephanie  
**Subject:** FW: SAUNDERS/MARY HOWARD (Ref: NRTAPR10), Invoice #1037055, File: 3GBQZ4  
Departs 09APR10 To: Tokyo, Tkt: 016-7570394975  
**Importance:** High  
**Attachments:** image001.jpg

FYI

*Twanna L. Duncan*  
Administrative Specialist  
Office of the Assistant Secretary  
for Manufacturing and Services  
International Trade Administration  
US Department of Commerce  
14th & Constitution Avenue, NW  
Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5897 fax

---

**From:** Jeanette Harrison  
**Sent:** Monday, March 15, 2010 11:59 AM  
**To:** Twanna Duncan  
**Subject:** FW: SAUNDERS/MARY HOWARD (Ref: NRTAPR10), Invoice #1037055, File: 3GBQZ4 Departs 09APR10  
To: Tokyo, Tkt: 016-7570394975  
**Importance:** High

---

**From:** Mary Saunders  
**Sent:** Wednesday, December 16, 2009 12:46 PM  
**To:** Jeanette Harrison  
**Subject:** FW: SAUNDERS/MARY HOWARD (Ref: NRTAPR10), Invoice #1037055, File: 3GBQZ4 Departs 09APR10  
To: Tokyo, Tkt: 016-7570394975  
**Importance:** High

For my trip file

---

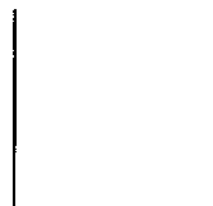
**From:** Wings@WingsTrips.com [mailto:Wings@WingsTrips.com]  
**Sent:** Wednesday, December 16, 2009 12:40 PM  
**To:** Mary Saunders; bschultz@astm.org  
**Subject:** SAUNDERS/MARY HOWARD (Ref: NRTAPR10), Invoice #1037055, File: 3GBQZ4 Departs 09APR10 To:  
Tokyo, Tkt: 016-7570394975  
**Importance:** High

**Useful Links**

Need a

3/15/2010

ation?  
TripBlip



**\*\*URGENT- PLEASE REVIEW THIS ITINERARY FOR ACCURACY.\*\***

Be sure to inform us of any discrepancies or misspellings within 24 hours. Changes made after 24 hours will carry costs which will be your responsibility.

UNIGLOBE Wings Travel  
702 DeKalb Pike  
Blue Bell, PA 19422  
Phone: (215) 628-3322 (800) 243-4370  
[Wings@WingsTrips.com](mailto:Wings@WingsTrips.com)

<b>Passenger(s):</b>	<b>Saunders/Mary Howard</b>	<b>Agent:</b>	Debbie Murphy
	<b>Ref: NRTAPR10</b>		
<b>Invoice No.:</b>	1037055	<b>File No.:</b>	3GBQZ4
<b>Date:</b>	Wednesday, December 16, 2009	<b>Customer:</b>	ASTMXX
<b>Billing:</b>	ASTM - DORIS HILTON	<b>Deliver:</b>	E-TKT RES: UA/NSJ89J
	100 BARR HARBOR RD		
	CONSHOHOCKEN PA 19428		

• If you would like to view your reservation online: [Click Here](#)

**FLIGHT - Friday, 9 April 2010**

**United Airlines Flight UA803 Business Class**

**Check In Confirmation: NSJ89J (24 Hours prior)**

<b>Depart:</b>	12:43 PM, Friday, April 9 Dulles Intl Washington, Dist. of Columbia, USA	<b>Arrive:</b>	3:30 PM, Saturday, April 10 Narita-Terminal 1 Tokyo, Japan
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<b>Status:</b>	Confirmed	<b>Equipment:</b>	Boeing 777
<b>Stops:</b>	Non-stop	<b>Duration:</b>	13 hours 47 minutes
<b>Seat:</b>	13B (Non Smoking) Confirmed	<b>FF Number:</b>	UA00414275087
<b>Meal:</b>	Lunch, Lunch		
• <b>Weather</b> • <b>Flight Status</b>			

**FLIGHT - Thursday, 15 April 2010**

**Check In Confirmation:**  
**NSJ89J** (\*24 Hours prior)

**United Airlines Flight UA804 Business Class**

**Depart:** 4:00 PM, Thursday, April 15  
 Narita-Terminal 1  
 Tokyo, Japan

**Arrive:** 3:35 PM, Thursday, April 15  
 Dulles Intl  
 Washington, Dist. of Columbia,  
 USA

**Status:** Confirmed  
**Stops:** Non-stop  
**Seat:** 13B (Non Smoking) Confirmed  
**Meal:** Dinner, Breakfast

**Equipment:** Boeing 777  
**Duration:** 12 hours 35 minutes  
**FF Number:** UA00414275087

• Weather • Flight Status

**Invoice Details**

Transaction / Document	Base	Tax	Total
Electronic Ticket / 016 7570394975	6630.00	223.37	6853.37
Form of Payment: AX XXXXXXXXXXXXXXX1012			
<b>Totals:</b>			<b>6853.37</b>

**Total Charged to Credit Card: USD 6853.37**  
**Balance Due: USD 0.00**

**Fare Rules**

- THANK YOU FOR BOOKING WITH UNIGLOBE WINGS TRAVEL-DEBBIEM TICKETS ARE NON-REFUNDABLE - \*\*FEE FOR CHANGE\*\* TRANSACTION SUBJECT TO NON-REFUNDABLE PROCESSING FEE
- AIRLINE POLICY - FARE IS NOT GUARANTEED UNTIL TICKETED. THIS TICKET IS NON REFUNDABLE AND NON TRANSFERABLE. CHANGES ARE SUBJECT TO AVAILABILITY ..FEE AND ANY FARE UPGRADE. CANCELLATION MUST BE DONE PRIOR TO FLIGHT DEPARTURE TO AVOID FORFEITURE OF TICKET

**Baggage Allowance**

BAGGAGE CHARGES MAY APPLY. BAGGAGE ALLOWANCE, SPECIFIC SIZE AND WEIGHT RESTRICTIONS VARY BETWEEN AIRLINES. PLEASE VISIT THE AIRLINES WEBSITE OR CONTACT THE AIRLINE DIRECTLY FOR DETAILS.

- UNITED AIRLINES OR CALL 1-800-538-2929

**Important Information**

- PLEASE CHECK IN AT LEAST 3 HOURS PRIOR TO DEPARTURE. LATE CHECKIN MAY RESULT IN THE LOSS OF SEAT/RESERVATION. CHECK IN CUT OFF TIME IS 60 MINUTES PRIOR TO DEPARTURE. RECONFIRM INTERNATIONAL FLIGHTS DIRECT WITH THE AIRLINE OTHERWISE IT MAY RESULT IN CANCELLATION.
- A VALID PASSPORT IS REQUIRED FOR YOUR JOURNEY.
- —AIRPORT SECURITY REVISIONS— TRAVELERS MAY CARRY TRAVEL SIZED TOILETRIES OR LIQUIDS 3 OZ OR LESS THROUGH SECURITY CHECK POINTS. THEY MUST FIT IN ONE QUART SIZED, CLEAR PLASTIC ZIP-TOP BAG. VISIT [WWW.TSA.GOV](http://WWW.TSA.GOV) FOR DETAILED INFORMATION.
- THIS IS AN ELECTRONIC TICKET VALID ONLY ON ISSUING AIRLINE PHOTO ID AND ETKT ITINERARY REQUIRED FOR CHECK IN. BOARDING CARDS REQUIRED PRIOR TO ENTERING SECURITY.
- UNITED AIRLINES FREQ. FLYER NBR 00414275087 APPENDED
- RESCUE LINE: FOR TRUE EMERGENCY SITUATIONS OUTSIDE OUR NORMAL BUSINESS HOURS, PLEASE CALL TOLL-FREE 888 567-9435 FOR EMERGENCY ASSISTANCE. FEES APPLY

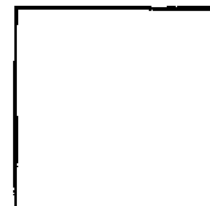


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• EMERGENCY TRAVEL ASSIST TOLL-FREE IN JAPAN 00531-11-1013**

**Invoice No: 1037055**

Airline Conditions of Contract & Other Important Notices [Click Here](#)

Sent To: mary.saunders@trade.gov, bschultz@astm.org



**Dyer, Stephanie**

---

**From:** Twanna Duncan [Twanna.Duncan@trade.gov]  
**Sent:** Monday, March 15, 2010 11:44 AM  
**To:** Dyer, Stephanie  
**Subject:** FW: Request for Lodging Amount for Mary Saunders

FYI

*Twanna L. Duncan*  
Administrative Specialist  
Office of the Assistant Secretary  
for Manufacturing and Services  
International Trade Administration  
US Department of Commerce  
14th & Constitution Avenue, NW  
Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5697 fax

---

**From:** Schultz, Betty [mailto:bschultz@astm.org]  
**Sent:** Monday, March 15, 2010 11:34 AM  
**To:** Twanna Duncan  
**Cc:** Houck, Maureen  
**Subject:** RE: Request for Lodging Amount for Mary Saunders

Dear Twanna,

The single guest room rate at the Mandarin Oriental Tokyo is 52,890 JPY, which today's exchange rate equals \$583.10 USD.

Since ASTM pays for the Board attendee's expenses, the cost of the room was to be on the ASTM Master Account.

Do you need special arrangements for Mary?

For most of our Board attendees who have worked for the government – picking up the expenses our typical way works fine. However, occasionally we have special billing requests (and reimbursement requests) which we are happy to do if it makes it easier.

Please feel free to contact Maureen Houck or I if you need anything changed.

Sincerely,

Betty

---

**From:** Twanna Duncan [mailto:Twanna.Duncan@trade.gov]  
**Sent:** Monday, March 15, 2010 11:15 AM  
**To:** Schultz, Betty  
**Subject:** Request for Lodging Amount for Mary Saunders  
**Importance:** High

Good Morning Betty,

Our OGC office is requesting to know what the amount is for lodging for Mary's stay while in Tokyo, Japan. Mary

3/15/2010

is in Japan April 12-16. How much is the cost per night in USD amounts?

Thanks for your help with this request.

*Swanna L. Duncan*  
Administrative Specialist  
Office of the Assistant Secretary  
for Manufacturing and Services  
International Trade Administration  
US Department of Commerce  
14th & Constitution Avenue, NW  
Room 3832-HCHB  
Washington, DC 20230

202-482-1465 office  
202-482-5697 fax

TELEPHONE NOTES

DATE	ATTORNEY/ SPECIALIST	NOTES
3/13/10	Syer	Tina Suran wiremail 3/15/10 need more info will send info via email 3/16/10 Lodging = \$500.10 / per night Total \$2332.70 Single Buffet Room Airfare = \$653.37 non-spb, non-smoking seat business class / confirmed part of fare simultaneously scheduled in other also and business class / <del>part of fare</del>
3/16/10	Syer	Bobby Schultz (402) 832-9701