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The Honorable Donald A. Manzullo
Chairman
Subcommittee on Procurement, Exports, and Business Opportunities
Committee on Small Business
House of Representatives

Dear Mr. Chairman:

As Congress considers how to downsize the federal government, many of the proposals being reviewed would involve terminating federal functions and agencies. Several proposals would abolish the Department of Commerce and, in the process, eliminate some of its component parts and relocate others to various parts of the government. Abolishing the Commerce Department would have significant implications for the operations of the federal government's trade programs and responsibilities, even if all of Commerce's trade operations were to be removed to other agencies.

You asked us to provide some insights into how Congress could consolidate federal trade activities were the Commerce Department to be abolished. This letter responds to your request by (1) reviewing the role that Commerce plays in trade, (2) discussing two past efforts to reorganize federal trade activities and their implications for today's debate, (3) commenting on some of the proposals that have been made for reorganizing Commerce's trade functions, and (4) presenting some principles that Congress may wish to use to guide it in this debate.

This letter is based on more than a decade of GAO work covering a wide variety of trade-related issues. These involved export promotion, including the programs of the Commerce Department and the U.S. Department of Agriculture (USDA); major trade negotiations and agreements, such as the North American Free Trade Agreement (NAFTA) and the General Agreement on Tariffs and Trade (GATT); trade regulation, including antidumping and countervailing duty matters; and other issues. Because this letter is based on prior work, we did not obtain agency comments.

COMMERCE'S ROLE IN FEDERAL TRADE ACTIVITIES

The Commerce Department is a major participant in many of the federal government's trade activities. (See enclosure for a listing of federal trade functions.) Specifically, Commerce plays a significant role in trade policymaking and negotiating, export promotion, trade regulation, and trade data collection and analysis.

The Commerce Department is at the center of federal efforts to promote exports. The Secretary of Commerce chairs the Trade Promotion Coordinating Committee (TPCC), an interagency group that is responsible for developing and coordinating U.S. export promotion programs. This strategy aims to rationalize the federal government's $3.3 billion in federal export promotion expenditures, which include efforts to provide export financing; export-related information; and export "facilitation" services, such as business counseling and training.

Three agencies represented over 90 percent of federal spending on export promotion in fiscal year 1994. USDA spent most of these funds, about $2 billion. USDA provides both export information and export facilitation services, as well as financing to exporters of agricultural products. The Export-Import Bank of the United States (Eximbank) spent about $774 million, on export loans, guarantees, and insurance. The Commerce Department spent about $233 million. Most of this was expended by Commerce's International Trade Administration (ITA). Three of the four organizational units of ITA--the U.S. Commercial Service (USCS),[1] International Economic Policy (IEP--the "country desks"), and Trade Development (TD--the "industry desks")--provide a range of export information and export

[1]Formerly the U.S. & Foreign Commercial Service.

facilitation services for exporters of manufactured goods and services.[2] Commerce has no authority to finance exports. Other federal organizations have smaller export promotion programs: the Trade and Development Agency; the U.S. Information Agency; the Small Business Administration; the Overseas Private Investment Corporation (OPIC); and the Departments of State, Transportation, Energy, Labor, and the Treasury.

Commerce also participates in coordinating, formulating, and implementing U.S. trade policy. Much of U.S. trade policy is developed through a decision-making mechanism comprised of several interlocking interagency committees and related subcommittees, chaired by the U.S. Trade Representative (USTR); and a large number of advisory committees composed of business, labor, and other representatives of the private sector. Commerce staff play important roles on the cabinet-level Trade Policy Committee, sub-cabinet-level Trade Policy Review Group, and staff-level Trade Policy Staff Committee. Also, ITA staff provide much of the information and analysis that support the formulation of trade policy and U.S. strategies for trade negotiations. For example, USTR relied heavily on Commerce's country desk officers to provide region-specific policy analysis support for NAFTA. These staff also participate in some negotiations, coordinate with the private sector advisory committees, and help to monitor other countries' compliance with trade agreements.

Commerce has major responsibilities in trade regulation as well. Commerce shares export control licensing responsibility with the State Department. Commerce's Bureau of Export Administration (BXA) licenses the export of civilian products that may have military applications (so-called "dual use" goods), while the State Department licenses the export of military goods. For dual use items, Commerce is responsible for receiving applications, referring them to other agencies when appropriate (such as

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[2]Although it is not a part of ITA, Commerce's U.S. Travel and Tourism Administration is involved in another type of export promotion activity--promoting foreign tourism in the United States.

the Departments of Defense and Energy), receiving advice back from them, and conducting dispute resolution procedures if there is no consensus. Disagreements between agencies on export control issues are to be dealt with through an interagency process.

Commerce shares responsibility with the International Trade Commission (ITC) for administering countervailing duty and antidumping laws. The U.S. government can place an additional duty on imports of goods that are being unfairly subsidized or "dumped" (i.e., unfairly sold below market prices) in the United States to the detriment of U.S. firms. ITA's Import Administration (IA) unit is responsible for making these determinations. In a parallel proceeding, ITC is to determine whether injury or the threat of injury has occurred to U.S. firms as a result of the subsidies or dumping. If subsidization or dumping and injury exist, then duties are to be imposed on the importers. Commerce's IA unit also administers other import programs, such as those under the machine tool and semiconductor agreements with Japan.

Several organizations in the Commerce Department collect, analyze, and disseminate trade or international investment data. The Census Bureau compiles current statistics on exports, imports, and shipping. Census also prepares and analyzes estimates of U.S. direct investment abroad and foreign direct investment in the United States. Commerce's National Technical Information Service and Bureau of Economic Analysis also work with trade data.

TWO PAST EFFORTS TO REORGANIZE AND REFOCUS TRADE FUNCTIONS

There have been two efforts made in the last 15 years to reorganize and/or refocus federal trade functions. The experience with these efforts is relevant for today's debate on rearranging these activities. The first effort, in 1980, was a major restructuring involving the trade policymaking, export promotion, and trade regulation bureaucracies. The other endeavor, in 1992, was an attempt to sharpen the strategic focus of federal export promotion efforts without resorting to a reorganization.

1980 Trade Reorganization

During the latter part of the 1970s, the U.S. business community expressed concern about the implementation of specific federal trade functions. One concern was over the quality of the State Department's commercial activities overseas. Until 1980, the State Department had primary responsibility for this function. State Department commercial officers at U.S. embassies implemented programs that the Commerce Department in Washington, D.C., designed, managed, and offered to U.S. businesses nationwide.

However, as we reported in 1982,[3] when State had primary responsibility for commercial work abroad the agency accorded it a very low priority, as compared with foreign policy, economic, and consular work. The State Department devoted fewer resources to commercial activities than to other functions and failed to recruit employees with strong commercial experience. State Department employees performing commercial work suffered from low career status and fewer promotions and were often encouraged to work on noncommercial affairs that State considered to be higher priority matters. The State Department's disinterest resulted in poor commercial service for U.S. businesses.

At the same time, the U.S. business community and some Members of Congress questioned the ability of State's commercial officers to vigorously monitor and enforce foreign government compliance with agreements resulting from the Tokyo Round of multilateral trade negotiations under GATT.[4] They expressed concern about potential conflicts of responsibility inherent in having State monitor foreign government compliance with trade agreements as well as maintain diplomatic relations with these governments. They also maintained that the Treasury

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[3]Problems Hamper Foreign Commercial Service's Progress (GAO/ID-83-10, Oct. 18, 1982).

[4]See The International Agreement on Government Procurement: An Assessment of Its Commercial Value and U.S. Government Implementation (GAO/NSIAD-84-117, July 16, 1984).

Department, which at the time administered U.S. antidumping and countervailing duty laws, was not, in practice, fulfilling these responsibilities.

Also, there were concerns that the Office of the Special Trade Representative, as USTR was then known, did not have sufficient authority over trade policymaking within the government to function effectively in all international trade-related negotiations. At the time, for example, the State Department had primary responsibility for several areas of trade negotiations, including commodity and East/West trade negotiations.

Consequently, Congress included in the Trade Agreements Act of 1979 (P.L. 96-39) a provision requiring the President to submit a proposal to reorganize the federal trade bureaucracy. The reorganization was to result in the upgrading of commercial programs and commercial attaches overseas to ensure that U.S. trading partners were meeting their trade agreement obligations. The act also required the President to "consider" strengthening the coordination and functional responsibilities of the Special Trade Representative's Office. The administration responded with Reorganization Plan No. 3 of 1979.

The Administration's Plan Reorganized Multiple Trade Functions

Reorganization Plan No. 3 made three major changes to the structure and functioning of the federal trade bureaucracy. First, it transferred from the State Department to the Commerce Department primary responsibility for overseas commercial work. Second, it moved responsibility for administering antidumping and countervailing duty laws from the Treasury Department to Commerce. Third, the plan renamed the Office of the Special Trade Representative the Office of the U.S. Trade Representative, and enhanced its status. Under the plan, USTR was made responsible for developing and coordinating U.S. international trade policy, including commodity and trade-related investment matters. The plan further provided that USTR should have lead responsibility for conducting international trade negotiations, including representing the United States in GATT matters, trade and commodity matters considered in the

Organization for Economic Cooperation and Development and the United Nations Conference on Trade and Development, and East-West trade negotiations. Moreover, the plan designated USTR as the principal adviser to the President on international trade policy, as vice chairman of OPIC, and as a nonvoting member of the Board of Directors of the Eximbank.

1992 Creation of the Trade Promotion Coordinating Committee

Twelve years after the 1980 reorganization, Congress acted to change the operations of one of the government's trade functions. However, the concerns involved only one trade function--export promotion--and the solution that was attempted stopped short of a major reorganization.

Congressional concerns in this area were sparked, in part, by a January 1992 GAO report.[5] This report said that federal export promotion activities were fragmented among numerous agencies and lacked any governmentwide strategy or priorities. The report, and subsequent GAO work, found that this fragmentation resulted in inefficiency, overlap, duplication, and apparent funding anomalies that increased costs and undermined the potential success of export promotion activities. For example, we found that in fiscal year 1991 almost 75 percent of export promotion funds went to USDA, even though agricultural exports accounted for only about 10 percent of U.S. exports. Also, three federal agencies maintained separate networks of field offices that provided export assistance, which likely confused and discouraged some U.S. firms from seeking such assistance.

The Export Enhancement Act of 1992

In October 1992, Congress acted to correct this situation. Title II of the Export Enhancement Act of 1992 (P.L. 102-429) statutorily authorized the TPCC and required it to issue an annual report containing "a governmentwide strategic plan for federal trade promotion efforts" and

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[5]See Export Promotion: Federal Programs Lack Organizational and Funding Cohesiveness (GAO/NSIAD-92-49, Jan. 10, 1992).

describing the plan's implementation. The act mandated that this strategy be based on a set of governmentwide priorities and include a unified budget proposal that reflected those priorities.

Both Efforts Addressed Specific Problems Through a Minimally Disruptive Approach

Both the 1980 and 1992 efforts addressed specific problems with the trade bureaucracy in a minimally disruptive way. The 1980 reorganization represented a compromise between those who wanted to create a cabinet-level Department of Trade and those who believed that no such reorganization was needed. Participants debated whether creation of a new cabinet agency was necessary to highlight and symbolize the importance of trade to the United States and strengthen the management of trade activities or whether such a department would only lead to more protectionist trade policies. It was left to the administration to devise a new bureaucratic structure that would realize the objectives of the Trade Agreements Act of 1979.

Similarly, the 1992 statutory authorization of TPCC and the requirement that it develop a governmentwide strategy for export promotion represented an attempt to find a minimally disruptive solution to the problems caused by this function's organizational fragmentation. The Export Enhancement Act did not require the administration to reorganize, or to consider reorganizing, the export promotion function. A key issue, therefore, was whether, with such a mandate, TPCC could overcome interagency disagreements over priorities and funding requirements and bring a true strategic focus to the federal export promotion effort.

COMMENTS ON PROPOSALS TO REORGANIZE COMMERCE'S TRADE OPERATIONS

Proposals calling for the elimination of the Commerce Department provide Congress and the administration with both an opportunity and a challenge. The opportunity lies in the ability to take a fresh look at all of the government's trade programs and activities. The challenge is to determine if the programs and activities can be better organized in a manner that does not harm the government's ability to carry out necessary functions and permits congressionally mandated policy goals to be achieved in a more administratively efficient manner.

Trade Policy Functions

Formulating trade policy and negotiating trade agreements are core international functions of the federal government. Any reorganization of Commerce's trade apparatus needs to be sensitive to how it might affect the government's abilities to carry out these activities.

We are concerned that one proposal, contained in the Department of Commerce Dismantling Act (H.R. 1756, 104th Cong.), could have a deleterious impact on trade policymaking and negotiating. This proposal would eliminate ITA's country and industry desks. We are concerned that eliminating these offices--IEP and TD--would deprive USTR of much of the analytic support that it needs to formulate trade policy and negotiating strategies for trade agreements. Presently USTR has fewer than 170 people. If it remains this size, it will need to continue to rely on others for this support. IEP and TD staff devote nearly one-half of their time to supporting trade policy activities, according to a 1993 report by Commerce's Inspector General.[6] Were these two organizations to be abolished, it is not clear who would be able to perform this work, including the work that may be required for future trade negotiations, such as expanding NAFTA to other Latin American countries.

Others have proposed transferring the overseas component of USCS to the State Department. This could affect the government's ability to monitor and enforce other countries' compliance with trade agreements. USCS staff

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[6]Assessment of Commerce's Efforts in Helping U.S. Firms Meet the Export Challenges of the 1990s, U.S. Department of Commerce, Office of Inspector General, IRM-4523 (Washington, D.C.: U.S. Government Printing Office, Mar. 17, 1993), pp. 31-7.

overseas, in particular, help with this monitoring. However, as in 1980, a concern may be raised that State would experience a conflict of responsibility between maintaining good diplomatic relations and monitoring foreign government compliance with trade agreements.

Export Promotion

Last month we testified before this Subcommittee on the rationales that generally are used to justify export promotion programs.[7] We said that there is no definitive empirical work that demonstrates unequivocally the net impact on the nation--positive or negative--of these programs. Consequently, debates over government assistance to exporting rely heavily on qualitative arguments.

Proponents have justified export promotion activities using microeconomic and trade policy arguments. For example, ITA's export facilitation and information services have been justified by reference to "market failures," which can occur when certain key conditions in markets are not met. One such market failure can occur if U.S. producers of competitive products do not export because they lack information about foreign markets and lack the economies of scale to justify expenditures for such information. ITA has programs to collect and distribute commercially valuable information on foreign markets that the private sector may not otherwise be able to acquire.

Similarly, proponents also use trade policy arguments to make a case for U.S. government "advocacy" efforts. Advocacy refers to U.S. government representation on behalf of a U.S. firm competing for a potential foreign sale. To the extent that U.S. officials can counter the advocacy of foreign government officials, U.S. firms with competitive products can be made better off by such efforts. TPCC maintains an advocacy center in the Commerce Department to

[7]See Export Promotion: Rationales for and Against Government Programs and Expenditures (GAO/T-GGD-95-169, May 23, 1995).

identify circumstances when high-level advocacy is appropriate and to initiate such advocacy.

Because Commerce is the lead agency for export promotion, proposals to eliminate the Commerce Department would have a major effect on this function. Thus, were Commerce to be abolished, Congress would need to consider who, if anyone, should chair and provide leadership for TPCC.

Proposals to relocate Commerce's USCS also could have major consequences for export promotion. H.R. 1756 would move the foreign operations of USCS to USTR. Although this might result in better integration of export promotion with trade policy, it would be important to consider whether USTR has the resources to manage USCS. In addition to having fewer than 170 staff, USTR has a minimal administrative support system. Overseas, USCS employs in a hierarchical structure about 800 foreign commercial and foreign national employees in over 130 markets. Managing this network is a complex logistical responsibility, especially considering that the foreign commercial staff tend to relocate every few years. In our 1982 report,[8] we found that the Commerce Department, with considerably greater administrative capability than USTR, experienced great difficulty administering the newly created Foreign Commercial Service.

In addition, by eliminating ITA's industry and country desk staff, as well as the domestic component of USCS, H.R. 1756 would abolish staff who provide much of the tasking for USCS officials stationed overseas. These industry and country experts and domestic office staff help organize and recruit companies for overseas trade missions and trade fairs. USCS officials abroad help support the firms' participation in these events. In addition, these Commerce staff in the United States refer many companies to overseas USCS officials for expert advice and help arrange itineraries for overseas business travel.

[8]GAO/ID-83-10.

Compared to transferring USCS to USTR, relocating it to the State Department would not present such an obvious management challenge. Furthermore, doing so could infuse a more commercial orientation into State. On the other hand, such a move could cause the export promotion mission to be subordinated to other foreign policy priorities, as was the case before commercial work was transferred from State to Commerce just 15 years ago.

Reorganizing Trade Regulation

Currently, most of Commerce's trade regulation functions are mandated by law. This includes licensing the export of dual use goods and administering countervailing duties, antidumping investigations, and other import programs. Therefore, the government will need to retain the capacity to carry out Commerce's trade regulation activities as long as those laws apply.

The Department of Commerce Dismantling Act would split Commerce's trade regulation activities among several government agencies. Commerce's export-licensing authority would transfer to the State Department, thus consolidating all export-licensing authority in one agency. BXA's enforcement operations would go to the Treasury Department's Customs Service, further centralizing those activities. H.R. 1756 would move Commerce's import administration unit to USTR.

Administering the export licensing of dual use commercial products has always involved a balancing of national security, foreign policy, and commercial interests. Therefore, consideration should be given to whether placing licensing authority for such products in the State Department could alter the necessary balancing of interests. Further, placing the import administration function in USTR could create a considerable administrative burden on USTR and thus could harm the efficiency with which the function would be implemented.

PRINCIPLES FOR REORGANIZING GOVERNMENT

With any government reorganization, difficult decisions have to be made in terms of defining both the appropriate role for government and the right organizational structures for delivering services to the public. In recent testimony, the Comptroller General presented the following five principles that could be used to guide efforts to reorganize the government, based upon GAO's work across the government.[9] These principles are as follows:

1. Reorganization Demands an Integrated Approach

The interconnectedness of government structures and activities cannot be underestimated. Reorganizations that do not consider the broader picture could create new, unintended consequences for the future. For this reason, it is important that Congress and the administration form an effective working relationship on restructuring initiatives and regulatory changes.

2. Reorganization Plans Should Be Designed to Achieve Specific, Identifiable Goals

Reorganization efforts can be better served if specific goals are identified. However, decisionmakers may find it difficult to reach a shared understanding of the goals. Regardless of what the specific objectives are, certain overarching goals should be kept in mind. These would include a government that serves the public efficiently and economically, one that is run in a business-like fashion with full accountability, and one that is flexible enough to respond to change.

3. Once the Goals Are Identified, the Right Vehicle(s) Must Be Chosen for Accomplishing Them

Discussions involving government reorganization often include a debate about the role of the federal government.

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[9]Government Reorganization: Issues and Principles (GAO/T-GGD/AIMD-95-166, May 17, 1995).

Even when decisions are reached that the government should play a role, questions will remain about how that role should be exercised. For example, should the government act directly or through another level of government? If the government is to act directly, should agencies or departments be organized, for example, around national missions or around customers or users of the programs?

4. Implementation Is Critical to the Success of any Reorganization

No matter what decisions are made about how to reorganize the government, fulfilling the promise of any new plan will depend on its implementation. For example, our work over the past decade has shown how many federal agencies have lacked the basic program and financial information needed to gauge progress, improve performance, and establish accountability.[10] Moving to a smaller, more efficient federal government that stresses accountability and managing for results will require better processes and information technology.

5. Oversight Is Needed to Ensure Effective Implementation

The process of reorganizing government should not stop when a plan is adopted. Although agencies will have the primary responsibility for ensuring that their programs are well managed and any changes are having their intended results, it is important that Congress continue to play a significant role in both its legislative and oversight capacities to establish, monitor, and maintain both governmentwide and agency-specific management reforms.

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[10]See GAO High Risk Series (GAO/HR-95-1 through GAO/HR-95-12, Feb. 1995). For examples of work stemming from our management reviews, see U.S. Department of Agriculture: Revitalizing and Streamlining Structure, Systems, and Strategies (GAO/RCED-91-168, Sept. 3, 1991); Tax Administration: Opportunities to Further Improve IRS' Business Review Process (GAO/GGD-92-125, Aug. 12, 1992); and Department of Transportation: Enhancing Policy and Program Effectiveness Through Improved Management (GAO/RCED-87-3 and 87-3S, Apr. 13, 1987).

CONCLUSIONS

Federal trade functions are important government responsibilities. The debate on closing the Commerce Department presents an opportunity to revisit the issue of how best to organize trade responsibilities and programs across the government. The Comptroller General's five principles for reorganizing government can be applied to such an endeavor.

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If you or your staff have any questions concerning this letter, please call me at (202) 512-4812. The information in this letter was developed by John Hutton, Assistant Director; Joseph Natalicchio, Senior Evaluator; and David Genser, Senior Evaluator.

Sincerely yours,

Allan I. Mendelowitz

Allan I. Mendelowitz, Managing Director
International Trade, Finance, and Competitiveness

TRADE-RELATED FUNCTIONS OF THE FEDERAL GOVERNMENT

One way to categorize the federal government's international trade-related activities is to divide them into six groups: trade policy, export promotion, trade regulation, trade and investment data collection and analysis, taxation, and other functions.

1. Trade Policy

   Agencies involved include the U.S. Trade Representative; and the Departments of Agriculture, Commerce, State, and Transportation. Activities include:

   A. Working through an interagency process to formulate and coordinate international trade or investment policies; and coordinating those policies with domestic policies, and with U.S. business and consumer interests and state and local governments.

   B. Negotiating international trade or international investment agreements.

   C. Funding and representing U.S. interests in trade-related international organizations.

2. Export Promotion

   Agencies involved include the Departments of Agriculture, Commerce, Energy, and State; the Export-Import Bank of the United States, the Overseas Private Investment Corporation; the Trade and Development Agency; and the Small Business Administration. Activities include:

   A. Formulating and coordinating export promotion policy.

B. Combating foreign export subsidies.

C. Financing and insuring U.S. trade or U.S. investments in other countries, or funding feasibility studies on major infrastructure and development projects.

D. Providing "trade facilitation" services to the public, such as export counseling, foreign market analyses, or trade missions or trade fairs.

E. Providing government-to-government advocacy on behalf of U.S. businesses.

F. Developing foreign markets for U.S. goods and services.

G. Providing tourism promotion services and formulating and coordinating tourism policy.

3. Trade and Investment Regulation

Agencies involved include the Departments of Agriculture, Commerce, Defense, Justice, Labor, State, and the Treasury; and the International Trade Commission. Activities include:

A. Licensing and restricting exports, imports, or foreign investments in the United States for national security, foreign policy, or short supply reasons.

B. Inspecting exports or imports for health, safety, or certain other reasons.

C. Enforcing U.S. laws on illegal drugs, money laundering, counterfeit goods, and other cross-border activities.

D. Enforcing U.S. laws that seek to protect U.S. companies or workers from "unfair" or harmful foreign trade practices, such as antidumping and countervailing duties laws; and providing financial assistance to offset such harm, such as trade adjustment assistance.

E. Enforcing U.S. rights under trade agreements and responding to certain foreign practices (secs. 301-310 of the Trade Act of 1974, as amended.)

F. Enforcing U.S. antiboycott laws and the Foreign Corrupt Practices Act.

G. Administering foreigners' blocked assets in the United States or adjudicating U.S. citizens' claims against foreigners.

4. Trade and Investment Data Collection and Analysis

Agencies involved include the Departments of Agriculture, Commerce, and the Treasury; and the International Trade Commission. Activities include:

A. Documenting and tracking trade and investment transactions and maintaining U.S. tariff schedules.

B. Analyzing or distributing trade and investment data to government decisionmakers or to the public.

5. Taxation

Agencies involved include the Department of the Treasury. Activities include:

A. Collecting customs duties and fees.

B. Taxing U.S. persons or corporations overseas or foreign persons or corporations that owe U.S. taxes.

6. Other Trade-Related Functions

Agencies involved include the Departments of Commerce, Justice, State, and the Treasury; and the Federal Reserve System. Activities include:

A. Issuing patents and registering trademarks.

B. Developing and maintaining information on U.S. product standards.

C. Regulating the banking activities of subsidiaries of foreign companies in the United States and subsidiaries of U.S. companies located abroad.

D. Enforcing U.S. antitrust laws that affect U.S. companies' ability to trade or invest abroad.

E. Adjudicating disputes over traded goods; e.g., the International Trade Commission's "Section 337" cases).

Sources: Budget of the U.S. Government for Fiscal Year 1996 (Washington, D.C.: U.S. Government Printing Office, 1995); Federal Staff Directory 1993/1 (Mount Vernon, Virginia: Staff Directories, Ltd., 1993); Export Programs: A Business Directory of U.S. Government Services, Trade Promotion Coordinating Committee (Washington, D.C.: U.S. Government Printing Office, 1995); GAO.

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