in many Government engineering staffs. The consulting engineer practices his profession over a wide and varied field, and will thereby apply new ideas, innovations, and techniques to projects he designs.

As you well know, sudden adjustments in civil service staffs to obtain particular skills, knowledge, or experience for a specific project is neither practicable nor probable.

4. Greater alertness to effective prosecution of the work in compliance with time schedules: Consulting engineers in private practice are accustomed to executing work under pressure and thereby comply with time schedules as specified in contracts. Seldom do planning and design projects run beyond time limits as long as the scope of the project is not materially changed. Government staffs may often have projects delayed by other projects assigned a higher priority. Often this predicament cannot be avoided and, if the staff is already working to capacity, a serious delay may result. The consulting engineer works under a very rigid contract, prepared by the Government, which stipulates, very definitely, the time limit. Therefore, the retaining of consulting engineers reduces the possibility of unwarranted delay to the minimum.

5. A deterrent to overexpansion of Governmental departments, thus minimizing "empire building": There is a growing and continuing tendency for Government agencies to increase their engineering staffs. Much of this is the result of sudden expansion to handle specific problems or temporary peak demands. The services of engineers in private practice can be utilized to great advantage in these instances, and the judicious use of consulting engineers will be a deterrent to overexpansion of Government staffs. This is sometimes referred to as "empire building," and must be discouraged in the interest of economy in Government.

6. True and complete records of engineering costs allocable to specific projects in an improved accounting system that would serve the interests of sound administrative procedures: Often engineers in private practice are called upon to prove that the cost of consulting engineering services is more economical than the same services provided by Government forces. We know the cost of our services is less, but we find ourselves at a great disadvantage to prove it conclusively because of the unrealistic accounting system of our Government. It is deplorable that our Government insists that private business maintain financial records for tax purposes from which we can submit an accurate and realistic cost for doing business, but it does not have an accounting system which indicates the true and complete cost of providing its engineering services. It is questioned, in published data by Government agencies regarding cost of engineering services, whether nonproductive time or items paid out of unallocated funds are included, such as cost and maintenance of buildings and utilities. These are certainly overhead costs and, to make a true and honest comparison with private business, must be included since they are a cost to the taxpayer. Government cost information, in its entirety, is not available to us, but it is to you gentlemen, and we recommend that you investigate this matter to assure yourselves that all costs for services are included before making a comparison with fees paid to consulting engineers. We believe that the cost accounting system of the Government should be revised so that it will be a fully reliable basis for examining costs of engineering work performed by Government staffs. We believe further that the private practice of engineering, or any other private enterprise, should not be subject to price competition by Government activity.

We wish to refer you to appendix C, below, entitled "Consulting Engineering Services by Private Firms Versus Public Agencies." This important resolution was adopted by the American Institute of Consulting Engineers on May 4, 1960. It vividly expresses the fallacy of comparing engineering costs without a reliable basis for doing so and urges that Government agencies establish proper systems of accounting to provide a reliable basis for comparison.

7. Economies in the handling of engineering in Federal programs, particularly for increased workloads occasioned by programs of an emergency nature, and projects of unusual character or magnitude: It is the council's contention that definite economies can be realized in the engineering design of Government projects by consulting engineers. Particularly those where it is deemed necessary to suddenly augment Government staffs to care for increased workloads occasioned by emergency programs of unusual nature or size. Reduction of Civil Service staffs seldom occurs, if ever. Staffs not kept busy to maximum efficiency are very costly and should be avoided. We believe that every owner or client is entitled to the highest possible return on money spent for engineer-