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**DECISION**



**THE COMPTROLLER GENERAL  
OF THE UNITED STATES**  
WASHINGTON, D. C. 20548

**FILE:** B-186998

**DATE:** November 9, 1976

**MATTER OF:** Availability of funds for printing invitations to Coast Guard change of command ceremony

**DIGEST:** Government payment of expense of printing invitations to Coast Guard change of command ceremony is proper since ceremony is traditional and appropriate observance, and printing of invitations may be considered necessary and proper expense incident to ceremony.

Mr. K. A. Mill, an authorized certifying officer of the United States Coast Guard, Department of Transportation, has requested our advance decision concerning the propriety of certifying for payment a voucher in the amount of \$61, for printing by a commercial printer of invitations to a change of command ceremony for a Coast Guard vessel, the USCGC Confidence. The printing was authorized by the Commanding Officer of the USCGC Confidence. Payment would be made from appropriations authorized for U.S. Coast Guard operating expenses.

Printing of any document or matter by any agency or establishment of the Government is not allowed unless it is authorized by law and necessary to the public business. 44 U.S.C. § 1102 (1970). Printing meeting these requirements may be purchased directly from commercial establishments, rather than from the Government Printing Office (GPO), if commercial printing is more economical, or if the GPO is not able to execute the order. Usually, the agency desiring commercial printing must secure authorization from the GPO. 44 U.S.C. § 504 (1970). However, commercial printing may be procured without such authorization if: (1) it is not of a continuing repetitive nature; (2) it is not conducive to the establishment of an open ended indefinite quantity contract; (3) it cannot be ordered against existing GPO contracts; and (4) it costs less than \$250 per line item. Government Printing and Binding Regulations, 43-2 (1974).

The printing of invitations in this case appears to meet these regulatory requirements for using a commercial establishment without GPO authorization. The crucial issue, then, is whether the printing of invitations is authorized by law and necessary to the public business of the Coast Guard, as required by 44 U.S.C. § 1102 (1970).

In B-122515, February 23, 1955, we allowed invitations to official State Department functions overseas to be paid for with appropriated funds. However, the appropriation charged in that case was for representation expenses, specifically including costs of official entertaining. We did not allow the cost of printing similar invitations to be paid from appropriations for representation expenses in 42 Comp. Gen. 19 (1962). The decision in that case turned on a specific State Department regulation prohibiting the use of representation allowances for printing or engraving. The special circumstances in both these cases prevent generalization of either result to the present case.

In B-11884, August 26, 1940, we allowed payment for the printing of invitations to a Government cornerstone ceremony, as an expense necessarily incident to the ceremony. Payment of expenses for cornerstone ceremonies and for building dedication ceremonies is allowed because such ceremonies are traditional practices associated with the construction of public buildings. See 53 Comp. Gen. 119 (1973).

Changes in command occur within the Armed Forces, including the Coast Guard, when a commander is transferred or retired, and a new officer takes command. We have been advised informally that ceremonies in observance of changes in command are a Coast Guard tradition of long standing, although they are not specifically authorized by statute or regulation. Just as building dedication ceremonies are considered to be a proper way of commemorating the completion of public buildings, so a ceremony may be a proper way of observing a change in command in the Armed Forces. Since our Office has allowed appropriated funds to be used to pay for the printing of invitations as an expense necessarily incident to cornerstone ceremonies, it appears proper to allow appropriated funds to be used to pay for the printing of invitations to change in command ceremonies.

Mr. Mill noted, in his letter to us, that several of our decisions had not allowed the printing of greeting cards or calling cards at Government expense, and that these decisions might preclude payment in the instant case. The prohibition against printing greeting cards and calling cards at Government expense is well settled, 47 Comp. Gen. 314 (1967); 41 Comp. Gen. 529 (1962); 10 Comp. Dec. 506 (1904); B-156724, July 7, 1965; decisions cited in those cases; and Government Printing and Binding Regulations, Para. 20 (1974). These decisions are based on the rationale that greeting cards and calling cards are inherently personal in nature. For example, 10 Comp. Dec. 506, 507 (1904), which denied payment for calling cards, stated:

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"An officer's appointment or commission is the legal evidence that he holds such office or place. If for convenience he desires other evidence of such fact, this is not a legal necessity, but a matter of mere personal convenience, for which he should personally pay \* \* \*."

In our view, invitations intended to procure the attendance of appropriate people at an official Government ceremony are not inherently personal, as are greeting cards and calling cards. B-11884, supra. Therefore, the voucher may be certified for payment if it is otherwise correct.

Acting

  
Comptroller General  
of the United States