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Comments Received :

Supporting Statement A:

13. VTP says, "There are no capitol, start-up costs".

Add: Cost estimates for computer, internet access, scanner, printer, ink, paper, envelopes, stamps, pens, telephone calls, electronic messaging...

"The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information.

"Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers..."

"Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred."

"Operations and maintenance cost include the cost of mailing faxing or calling in information, making paper copies, notary costs, and electronic transmissions."

"Regular maintenance of any equipment initial cost fall under capital and start-up would also belong here."

14. VTP did *not* provide *any* costs of the BTSSS to the Federal Government.

Add: BTSSS development and operation costs, BTSSS recurring costs, additional personnel, overtime...

"... provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and *any other expense* that would not have been incurred without this collection of information."

VA Form 10-3542: Instruction 6:
<https://www.reginfo.gov/public/do/DownloadDocument?objectID=1400>

VTP regulation 38 CFR 70.20(e) "Additional information", cited in item 2, equals VOA *determination* criteria.

Determination criteria, is *beyond* VTP authority to *make* payments or *not make* payments.

VOA has transformed *application* procedures into *determination* criteria to *deny* payments.

VTP cannot alter determination criteria "Prescribed by the President".

38 USC 111, Payments or allowances for beneficiary travel:

"... the Secretary *may* pay... an allowance based upon mileage at a rate of 41.5 cents per mile ..."

"if... the Secretary exercises the authority under this section to *make* any payments..."

"... the Secretary *shall* make the payments... to or for the following persons:"

See (b)(1)(A) through (b)(3)(C)(a) for the *only* authorized determination criteria.

Cite the law; chapter, paragraph and sentence, requiring VOA, on the VA Form 10-3542 and in item 2 above.