

INTRODUCTION

A. HISTORY

The Act of August 25, 1916, as amended (39 Stat. 535; 16 U.S.C. 1), establishing the National Park Service, the Concessions Policy Act of October 9, 1965 (79 Stat. 969; 16 U.S.C. 20), the Management Policies of the National Park Service and Title 36 CFR 51 form the basis for authorization and administration of the National Park Service Concessions Program. The former Act authorizes the Secretary to "***grant privileges, leases and permits***for the accommodation of visitors in the various parks, monuments, or other reservations herein provided for, ***." In addition, it authorizes the Secretary to make such rules and regulations as he may deem necessary for the use and management of Park System areas.

The latter Act furthers the 1916 Act in that it guides the Service as to how Congress wants it to administer the Concessions Program with the dual responsibility of preserving park values and providing for visitor enjoyment.

B. PURPOSE

The publication and release of this Guideline cancels the Concessions Manual which has been in use since March 27, 1979. It is a comprehensive reference source in that, to the extent possible, it contains all laws, regulations and policies in one place, thereby enabling us to eliminate all prior memorandums issued regarding policy or procedures. The publication of this Guideline will also supercede and cancel Special Directive 79-2 as the contents of that directive have been revised and incorporated herein.

The program authority for the National Park Service Concessions Program is vested in the Secretary of the Interior. This authority has been redelegated to the Director who has redelegated certain authorities to the Regional Directors who in turn redelegated certain authorities to the Superintendents. However, authority to change or deviate from approved Service policy remains with the Director.

C. HOW TO USE THIS GUIDELINE

The attached Guideline has been divided into the four sections listed below:

- SECTION I - Concessions Planning (Chapters 1 thru 4)
- SECTION II - Contract and Authorization Process (Chapters 5 thru 15)
- SECTION III - Concession Administration (Chapters 16 thru 34)
- SECTION IV - Index

Sections I and II are set up similarly, however, Section III has been set up a little differently since it contains a variety of subjects. The first chapter in Sections I and II contains the laws, regulations, policies and responsibilities relating to the section heading. In Section III, the laws, regulations and policies are contained in each chapter because of the diverse subject matter. In some instances, there may be no laws or regulations in which case we have so stated. We have used this approach so that everything about a particular subject can be found in one place. For ease of reading we have xeroxed lengthy quoted material directly from the source, i.e., laws were taken from the U.S. Code, regulations from the Code Of Federal Regulations. In several instances, some cross-referencing was found to be necessary but we have tried to keep it to a minimum.

The index is in the process of being developed and will be submitted at a later date. Attached at the end of this guideline is Appendix "A" which is a chronology or legislative summary of all laws pertaining to the concessions management function.

Comments concerning the contents or use of this guideline should be submitted to the Concessions Division (WASO) as questions arise.

Listed below are the Sections and chapters contained herein along with a brief statement of any changes. Most of the chapters were included in the previous Concessions manual or the contents therein have been issued separately by memoranda.

SECTION I - CONCESSIONS PLANNING

This section includes Chapters 1 through 4, all of which are new in their entirety. Chapter 3, subparagraph F, Feasibility Analysis, supersedes Special Directive 76-17, Cost and Economic Feasibility Analysis in the Planning Process, dated December 21, 1976.

SECTION II - CONTRACT AND AUTHORIZATION PROCESS

This section includes chapters 5 through 15. Chapters 5 through 7 incorporate the provisions of Special Directive 79-2 which is superseded and cancelled by the publication of this Guideline.

Chapter 5, Authority For Concession Authorizations. New chapter containing laws, regulations, policies and responsibilities relating to the concessions contracting process. This chapter incorporates and revises the role and function statements contained in Special Directive 79-2.

Chapter 6, Renewal Process For Concession Authorizations. Revised chapter to update the renewal process in accordance with delegation of contracting authority. New revised Fact Sheet language is included as Exhibit 1 to this

chapter. The Standard Contract Language (Exhibit 2) has been revised to incorporate those changes over the last several years which have already been transmitted by memorandum. Exhibit 3, the sample public notice, has been revised to omit the definition of right of preference in renewal in the next to the last paragraph. These revised languages should be used for all future contract and permit renewals.

Chapter 7, New Authorization Process. Chapter has been revised to incorporate delegation of contracting authority. New revised Prospectus language is included as Exhibit 1 to this chapter. This language should be used for all future new contracts or permits.

Chapter 8, Evaluation of Offers. New chapter.

Chapter 9, Execution and Distribution of Contracts and Permits. Revised to reflect execution authority for contracts and permits pursuant to delegation of authority.

Chapter 10, Contract Modification Documents. This chapter includes a section on Interim Letters of Authorization and Amendments and Extensions. This chapter has been completely revised.

Chapter 11, Contract Provisions. Paragraph A, Preferential Right to Additional Services, has been revised. Paragraph B, Possessory Interest, has been revised to reflect current Standard Concession Contract Language. Paragraph C, Subconcessions, has been revised to omit vending machines. Paragraph D, Terminations and Suspensions has been revised. Paragraph E, Disputes, has been revised to reflect current Standard Concession Contract Language and CFR provisions. Paragraph F, Sales and Transfers, was issued separately by memo on August 8, 1982; no changes have been made since that date.

Chapter 12, Vending Machines. New chapter.

Chapter 13, Commercial Use License. The contents of this chapter were issued separately by memorandum of June 7, 1983, but were not issued in guideline format. No changes have been made since that date except for the format.

Chapter 14, Cooperating Associations. This chapter is undergoing revision and will be published at a later date.

Chapter 15, Hostels. New chapter.

SECTION III - CONCESSION ADMINISTRATION

Chapter 16, Handicapped Access - New chapter. Includes the requirements of the Architectural Barriers Act and Title V, Section 504 of the Rehabilitation Act of 1973.

Chapter 17, Concession Facility Design and Construction - Has been extensively rewritten, updated and contains a chart on the Concessioner Design and Construction Process. Also, the reader is directed to design standards for lodging and food facilities that may be obtained from the Denver Service Center Concessions Branch.

Chapter 18, Rate Administration Program - Procedures for approving rates for campground accommodations were issued separately on May 24, 1983. No changes were made here. A new section on Hostels has been added to Method 1, Full Review of Similar Services. Method 4, Merchandise Pricing has been clarified to permit averaging different items of merchandise within a particular category. There is also a new section covering procedures to adjust rates to facilitate passing through utility charges. This was issued separately on June 8, 1983. The March 30, 1984, memo clarifying franchise fee calculation has been incorporated.

Chapter 19, Concessioner Review Program - Issued separately on September 8, 1982. Regional reporting date to WASO has been changed to December 15 of each year.

Chapter 20, Concessioner Review Program - Operational Performance - Issued separately on September 8, 1982. "Meaningful Deviation" has been clarified.

Chapter 21, Concessioner Review Program - Operational Performance Standards - Issued separately on September 8, 1982. Standard Elements pertaining to Reservations and Deposits have been modified to conform to policies contained in Chapter 29, Reservations and Conventions.

Chapter 22, Concessioner Review Program - Contract Compliance - Issued separately on February 23, 1983; no changes made.

Chapter 23, Insurance Program - A formula is now provided for the amount of liability coverage per accident or occurrence. Provisions for allowing the "no insurance"-option are clarified. The Insurance Review Checklist has been revised and is published in Chapter 22. A provision has been added whereby concessioners may have visitors sign a Visitor's Acknowledgement of Risk form for high risk activities, but may not require a waiver of liability. This was issued separately in July 1984.

Chapter 24, Financial Administration - No major changes to this chapter. Information has been updated and put into guideline format.

Chapter 25, Freedom of Information - Issued separately on October 8, 1982. No changes.

Chapter 26, Concessioner Operating and Maintenance Agreements - New chapter.

Chapter 27, Concessioner Personnel - Now includes sections on training and EEO and Affirmative Action. Section on EMPLOYMENT OF NPS PERSONNEL DEPENDENTS supersedes Director's memorandum of February 4, 1976, "Employment By Concessioners of the Spouses and Minor Children of National Park Service Employees."

Chapter 28, Handcrafts, Gifts and Merchandise - Policy expanded to cover all merchandise and includes a statement on Foreign merchandise. Chapter also includes a provision for appeals.

Chapter 29, Reservations and Conventions - Convention policy expanded cover reservations including individual visitors, commercial group tours and conventions. Policy supersedes Staff Directive 76-19, "Use of Concession Facilities for Conventions and Groups", dated November 11, 1976.

Chapter 30, Accepting Reduced Rates and Items of Nominal Value from Concessioners - Issued separately on October 22, 1983. Policy statement has been clarified to cover solicitation of gifts.

Chapter 31, NPS Concessions Employee Training - New.

Chapter 32, COMIS - Under development and will be issued at a later date.

Chapter 33, Other Operations

Paragraph A., Sales Tax - New

Paragraph B., Beverage Container Guidelines - Revisions issued September 21, 1982 - No change.

Paragraph C., Smoking in Public Places - Issued separately on September 28, 1980. No changes.

Paragraph D., Alcoholic Beverages - No change.

Paragraph E., Advertising - No change.

Paragraph F., Weights and Measures - No change.

Paragraph G., Trailer Villages - Policy revised for clarity. No substantive change.

Paragraph H., Scenic Viewers - New policy statement.

Chapter 34, Overview - Chapter is in the process of being developed and will be issued at a later date.

REVISIONS TO GUIDELINE AS OF JANUARY 1, 1986

Listed below are explanations of revisions that have been made to this Guideline since it was first released in 1984. Listed are only the chapters that contain revised or new material. Revised material has been indicated with an asterisk (*) preceding and an asterisk appearing immediately after the new or revised information. Chapters not listed contain no changes and have been reprinted as they appeared originally.

Chapter 5, Authority For Concession Authorizations - Exhibit 1 to this chapter has been revised to include the provisions of the Limited Concession Permit.

Chapter 6, Renewal Process For Concession Authorizations - Revised to include Limited Concession Permit procedures and to include a reference to Exhibit 6 which now provides sample franchise fee language for permits. Also revised to include the procedures and requirements enunciated in Special Directive 84-2 (REVISED) dated September 30, 1985. These changes are reflected on pages 3 thru 11. Also included is revised public notice language and standard contract language which have been issued previously under separate memoranda, and new pages 4 and 5 to Exhibit 6 which include sample franchise fee language for permits.

Chapter 7, New Authorization Process - Includes same changes as those mentioned above in Chapter 6.

Chapter 8, Evaluation of Offers - Revised to include limited permit requirements. Also page 28 to Exhibit 1 was inadvertently omitted from the first publication and is being included.

Chapter 9, Execution and Distribution of Contracts and Permits - Revised to reflect Limited Permit requirements.

Chapter 10, Contract Modification Documents - Revised to include more precise procedures on contract and permit extensions and to provide a sample contract amendment as a result of reconsideration of franchise fees (Exhibit 5).

Chapter 14, Cooperating Associations - New Chapter. Policy and procedures were transmitted earlier in Special Directive 78-2 (REVISED).

Chapter 16, Handicapped Access - Chapter has been rewritten to separate architectural issues in the renovation or construction of facilities from programmatic accessibility issues in Federally assisted and Federally conducted activities directed by Executive agencies. Reference to 36 CFR 1190 in Section A2. has been deleted and 41 CFR 101-19.6 has been inserted. A new section dealing with background information has been added to explain the history of the Uniform Federal Accessibility Standards. No further changes.

Chapter 17, Concession Facility Design and Construction - Section B, has been rewritten to reference Chapter 16 for the laws, regulations and policies concerning architectural and programmatic accessibility for disabled persons. No other changes made.

Chapter 18, Rate Administration Program - Paragraphs C.2. and 3. and D.4. are revised to permit Superintendents to select the method for approving rates for operations conducted under a Limited Concessions Permit. This was issued previously on May 16, 1985. The NOTE on Page 40 was revised by memorandum dated December 13, 1985, to permit the Regional Director to authorize the use of cents per gallon mark-up during periods when gasoline prices are rapidly changing. Exhibit 1 has been updated and was previously issued by memorandum dated February 22, 1985. There are no further changes.

Chapter 19, Concessioner Review Program - Revision is made to page 7 to include Limited Permit, which was issued via memorandum dated May 16, 1985. Sample NPS Concessioner Annual Overall Rating - Form 10-631 has been revised to illustrate a more detailed and effective narrative. No other changes.

Chapter 20, Concessioner Review Program - Operational Performance - Sample Periodic Concession Evaluation Report, Form numbers 10-603, 10-627 and 10-629 have been revised to correct final scores that were incorrectly entered. No other changes.

Chapter 21, Concessioner Review Program - Operational Performance Standards - Standard elements previously published for Concessioner Operated Campgrounds, issued via memorandum September 19, 1983, and Mountaineering Guide Services, issued via memorandum April 23, 1985, have been added to this chapter. Standard elements for Horse and Mule Operations, Standard IX, have been rewritten and are included in this chapter. Standard elements for Merchandising Operations, Standard V, have been revised, as per the revision to the Handcraft Policy, outlined in Chapter 28 of this guideline. No other changes.

Chapter 22, Concessioner Review Program - Contract Compliance - Pages 1 and 2 revised to incorporate compliance procedures for limited concession permits.

Chapter 23, Insurance Program - Typographical errors corrected in Paragraphs B. and C.3. Paragraph C.4a. has been revised to better reflect policy on replacing historic structures. In Paragraph C.5., Less than Full Coverage, the percentage for deductible and self assumption plans is changed from 5% to 10%. Paragraph C.6., Determining Property Values, has been revised to establish an improved system and procedures for determining property value. Paragraph D.3.(3), Liquor Liability Coverage, is changed to make clear that package sales are included. Exhibit 2 is retitled "Request For Insurance Replacement Cost Estimate" and revised to accommodate new system for determining building replacement costs. The Exhibit was informally issued by DSC's Concession Branch on February 27, 1985. There are no further changes.

Chapter 24, Financial Administration - On page 3, subparagraph a., information revised to change date on financial report form as a result of renewal and approval by OMB. Paragraph 3, Policy, on page 13, and paragraph 4, Responsibilities, on pages 13, 14, and 14a have been revised to incorporate the policies and procedures relating to franchise fees which are contained in Special Directive 84-2 (REVISED). Subparagraph d., on page 19 has been revised to include the requirement for electronic deposit of franchise fee payments of \$10,000 or more and also to provide for additional informational reference on cash management. On page 21, a typographical error has been corrected.

Chapter 28, Handcrafts, Gifts and Merchandise - Page 5, under Park Related Items, has been revised to clarify wording concerning how park related items should be displayed with United States Handcrafts. The section dealing with acceptable merchandise has been revised to include permitting the sale of merchandise fabricated from animal skins obtained from legally authorized sources, with certain labeling restrictions. The acceptable merchandise section has also been revised to permit the sale of outdated merchandise, where spoilage is not a problem, with certain labeling and display restrictions. No other changes.

Chapter 29, Reservations and Conventions - Paragraph C. 3. has been revised by adding two sub-paragraphs and retitled "Commercial Operations Outside Of Concessioner Authorizations." The revision clarifies criteria for groups to legitimately share in the common use of property kept in a park. The revision also provides for developing rental agreements to detect violation of concessioners' preferential rights and circumvention of 36 CFR §5. 3. No further changes.

Chapter 30, Accepting Reduced Rates and Items of Nominal Value from Concessioners - Paragraph F.1. is changed to require the contract or permit to be amended if an existing concessioner agrees to provide reduced rates to NPS employees while on official business. No further changes.

Chapter 33, Other Operations - Paragraph omitted from page 33 that was inadvertently entered twice in first publication.

EXPLANATION OF REVISIONS TO THE GUIDELINE AS OF FEBRUARY 28, 1987

The changes made with this Amendment No. 1 affect the following chapters. An explanation of each change is discussed below for your easy reference.

Chapter 6, Exhibit 8. Sample public notice language for Limited Concession Permits - this exhibit was inadvertently omitted from this chapter when release No. 2 was printed.

Chapter 9, page 2. The asterisked paragraph concerning limited concession permits has been added and the numbering formula for concession contracts and permits has been omitted and included in Chapter 32. No changes in policy have been made. This entire chapter was reprinted since it was only three pages and it was printed front to back.

Chapter 15. Chapter has been completely rewritten to incorporate the contents of the Director's memorandum of January 7, 1987 which included new procedures for authorizing hostel operations.

Chapter 20. The sample Periodic Concession Evaluation Report, Form 10-603 has been revised to reflect the circling of all applicable elements relating to Food and Beverage services. No other changes have been made. The sample Concessions Operational Performance Report, Form 10-629 has been revised by removing the asterisks which were used to denote changes made to the form when release No. 2 was printed. It was felt that the asterisks may cause some confusion when filling out the report.

Chapter 21. The table of contents for this chapter has been revised to reflect changes made. A new sample Food Service Establishment Inspection Report (Exhibit 1, page 5) has been included. The old form should be removed. Standard elements for the General Standard, Standard I, have been changed to add two sentences to the Garbage and Trash element which were inadvertently omitted from Release No. 2. The Periodic Concession Evaluation Report form for Horse and Mule Operations (Form 10-609) has been reprinted simply because it is a clearer copy and is easier to read. Standard Elements for Public Shower and Laundries (Standard XIII) and Trailer Villages (Short Term) and Concessioner Operated Campgrounds (Standard XIV) have been rewritten and are included in this revision. Standard elements for Concessioner Operated Campgrounds, Standard XXII have been combined into the Trailer Villages (Short Term) standard (Standard XIV). Standard No. XXII is now obsolete and should be removed. No other changes have been made.

Chapter 24, Paragraph D. - Chapter 24 D., Franchise Fees, has been completely revised. A new franchise fee system was adopted by the Director on December 15, 1986, and became effective on December 31, 1986. New procedures for determining franchise fees have been included in this section. The policy statement has

changed somewhat, however, the policy statement was approved by the Director on September 30, 1985, in Special Directive 84-2 (REVISED), the contents of which have also been included in this section.

Paragraphs E, F and G of this chapter have not been revised but had to be reprinted because of page number changes as a result of the changes made in paragraph D.

Chapter 27. 36 CFR Part 8 has been revised to permit concessioners to employ children between the ages of 14 and 16 and requires all concessioners to comply with Federal child labor standards regardless of their annual gross sales. Therefore, the regulations contained on pages 2 and 3 of this chapter have been revised to include these new regulations. This revision was issued separately on July 2, 1986, by the Director.

Chapter 32. New chapter. This chapter contains no policy statements but incorporates the contents of the Director's memorandum to all Regional Directors dated December 17, 1986, regarding numbering concession authorizations. The Concession Identification Number (CONCID) will now be used as an internal method of identifying every concession that existed in 1979 or has since been added to the rolls and will be used as the concession authorization numbering system.

Chapter 33. Changes were made in Paragraph D (Alcoholic Beverages) to this chapter as a result of recent changes to 36 CFR Parts 2 and 5 concerning alcoholic beverages. Paragraphs E, F and G were reprinted because of page number changes.

EXPLANATION OF REVISIONS TO THE GUIDELINE AS OF APRIL 1987

The changes made with this Amendment No. 2 are the result of revisions to the Insurance Program. Chapters which are affected by this revision are listed below and an explanation of each change is provided.

Chapter 6, Renewal Process for Concession Authorizations (Fact Sheet)

Exhibit 1, Standard Fact Sheet Language - has been revised to reflect new insurance requirements.

Exhibit 2, Standard Concession Contract Language - Section 15, Insurance and Indemnity has been revised and Exhibit "E", Building Replacement Cost for Insurance Purposes has been corrected.

Exhibit 6, Standard Concession Permit Language - Exhibit "A", Insurance and Indemnity, has been revised to include new language.

Exhibit 7, Limited Concession Permit Fact Sheet Language - revised to reflect new insurance requirements.

Exhibit 8, Public Notice For Limited Permits

Chapter 7, New Authorization Process - Contracts and Permits (Prospectus)

Exhibit 1, Standard Prospectus Language - revised to reflect new insurance requirements.

Exhibit 2, Limited Concession Permit Prospectus Language - revised to reflect new insurance requirements.

Chapter 8, Submission and Evaluation of Offers in Response to a Fact Sheet or Prospectus

Exhibit 1, Statement of Qualifications of Applicant - Part 3.E., revised to reflect new insurance requirements.

Chapter 23, Insurance Program

This chapter has been entirely rewritten to make it more streamlined, to more clearly follow insurance industry terminology, to describe new policy forms and their use and to simplify supervision of the program. Specific changes are discussed below:

Significant revisions to Section C., Property Insurance, include a new method for insuring joint use buildings, a different policy for buildings unoccupied for more than 60 consecutive days, deletion of the preferred sequence for alternative plans, and an increase in the percentage that each level of management

can approve for the various alternatives. Contract language has been revised to make clear that the concessioner's basic obligation is to repair or replace losses and that insurance is only the means to meet that obligation. Other changes include a requirement for hull insurance on certain watercraft, elimination of the waiver of same site property replacement clause and addition of a requirement that revisions to the contract Exhibit, Building Replacement Cost for Insurance Purposes, be sent to WASO.

Several important revisions have been made to Section D., Liability Insurance, including an explanation of new policies and their use, a new table showing minimum required coverage limits based on the number of persons at risk, and change of dollar amount limits per individual and per occurrence to per occurrence and annual aggregate amounts. We have eliminated contractual liability insurance and separate coverage amounts for comprehensive general liability and umbrella coverage. Worker's compensation is now required for concessioners if they have any hired employees because employees are not covered under any other Liability Insurance. The revised program recognizes the new practice of charging legal fees against the liability policy limits, but attempts to discourage use of such policies.

There is a new provision for future contracts/permits to allow the Secretary to revise insurance requirements for broad categories of concessioners without mutual agreement.

A table has been added to illustrate how specific types of watercraft should be insured. The United States may now be named as an additional insured in the event an insurance company refuses to write a waiver of subrogation clause. The Visitor's Acknowledgement of Risk form has been modified as described in our memorandum of July 30, 1986.

Section E., Supervision of the Program, has been changed by deleting the Broker's Analysis. The Insurance Checklist has been completely revised and retitled "Statement of Concessioner Insurance." The Statement is a two part form. Part I is completed by the park, indicating the services provided, and required insurance coverages and clauses. Part II is completed by the concessioner's insurance agent or corporate insurance department verifying whether or not the insurance coverage complies with that which is required. In order to assure that the concessioner is ready at the start of the season, the evaluation is completed prior to the start of the season or by February 1 for year round operations. The new form will reduce the park's workload in monitoring the program, provide more accurate reporting and provide the concessioner with a useful summary of its coverage. It should also assist the insurance agent in better understanding NPS insurance requirements.

EXPLANATION OF REVISIONS TO THE GUIDELINE AS OF APRIL 1988

Changes made with this Amendment No. 4 are as follows:

Chapter 6, Renewal Process for Concession Authorizations (Fact Sheet)

Exhibit 3 - Public Notice format revised to conform to "Federal Register" document drafting guidelines.

Chapter 17, Concessioner Facility Design and Construction

Exhibit 1 - The word "SUGGESTED" has been added to the heading on this form since it is not a mandatory requirement.

Chapter 20, Concessioner Review Program - Operational Performance

On page 3, the reference to §2.6(a) of the CFR has been changed to §1.5(a). This revision occurred because the CFR was reprinted in 1986 and the section was renumbered.

Page 9, 3rd paragraph under G. - The words "in the narrative section" have been added to make the paragraph more clear and a note has been added at the end of the paragraph stating that signatures are no longer required on Forms 10-629 (Operational Performance Rating) and Form 10-630 (Contract/Permit Compliance Form). These forms will be revised in the future and the signature blocks will be omitted.

Page 10 - This page was re-run because of a spill-over from page 9 as a result of the added note. Also, a statement has been added concerning evaluation of Limited Concession Permits.

Chapter 21, Concessioner Review Program - Operational Performance Standards

Exhibit 2 (Safety & Occupational Health Standard) - This entire exhibit has been revised and is now included in Chapter 34, however, the Safety and Occupational Health standard will still remain a part of the Concessioner Review Program even though it will not be included in Chapter 21.

Exhibit 8 (Marina Facilities) - Standard completely revised and sent out to Regions by memorandum dated February 10, 1986.

Exhibit 14, pgs. 4 and 5 (Short-Term Trailer Villages & Campgrounds). - A page was inadvertently omitted when this standard was revised and incorporated in NPS-48 in February 1987. The page is now being added.

Exhibit 15 (Trailer Villages - Long Term) - This standard has been completely revised and sent out to Regions by memorandum dated March 6, 1987.

Exhibit 17 (Water Guide Services) - This standard was completely revised (formerly River Runners) and sent out to Regions by memorandum dated October 30, 1987.

Exhibit 18 (Boat Rental Operations) - This standard was completely revised and sent out to Regions by memorandum dated August 31, 1987.

Chapter 24, Financial Administration

Exhibit 1, page 2 - Revised to reflect current industry statistics.
Exhibit 4, pages 1 and 2 - Revised to reflect current industry statistics.

Chapter 34, Loss Control Program

TAB and Chapter 34 - New Tab and Chapter titled "Loss Control Program". This program was sent to all Regions by memorandum dated July 28, 1987, and a subsequent memorandum clarifying certain issues raised was sent out on March 24, 1988.

Chapter 35, Leasing of Historic Structures

TAB and Chapter 35 - New tab and chapter for Historic Leasing. The contents of this chapter were finalized and sent to all Regional Directors by memorandum dated December 23, 1986. Exhibit 1 to this chapter is the Standard Contract Language to be used when contracting with concessioners where historic structures are involved.