

APPENDIX III:

**UNIVERSITY OF ARIZONA
RESPONSE TO ARIZONA GAME AND FISH DEPARTMENT
PUBLIC COMMENTS**

Response to Comments From the Arizona Game and Fish Department (AGFD)

In written comments received during the second public comment period, the Arizona Game and Fish Department (AGFD) and the Grand Canyon State Electric Cooperative Association (with Arizona Generation and Transmission Cooperatives and Arizona Public Service as co-signatories) suggested that ASM's responses to AGFD's written comments submitted to ASM during the first public comment period were insufficient. In order to address this concern, ASM has prepared a point-by-point response to AGFD's written comments received during both rounds of public comment.

First Round Comments and Responses:

1. ASM should use the outline from the statute to present its information.

Response: With the exception of the fact that ARS § 15-1631(D)(1)(d) was placed ahead of § 15-1631(D)(1)(a), the Notice of Intent and Proposal to Increase Rates and Fees follows the outline of the statute.

2. ASM needs a truly independent review.

Response: ASM would welcome a paid, independent review from a non-partisan, external entity. In the meantime, ASM and the UA Office for Research, Discovery, and Innovation (RDI), the unit to which ASM reports, has initiated a process-mapping project to help streamline ASM business practices. ASM is also engaging an external accounting firm in an attestation on the calculated rates and fees.

3. There is no real justification presented for the rates or fees.

Response: We realize that what constitutes justification to some individuals is simply outside the realm of possibility. ASM contends that the documentation presented meets generally accepted standards.

4. Statute and regulations (specifically, ARS § 41-844, "Duty to report discoveries; disposition of discoveries; definitions") only cover costs associated with services related to human remains, not artifacts, historic sites, etc.

Response: The Arizona Legislature has set out language in ARS § 15-1631(C) that provides that "The Arizona Board of Regents shall adopt any fees for services performed by the state museum pursuant to title 41, chapter 4.1, article 4 and section 41-865." This language clearly provides authority for the Board of Regents to adopt fees for services performed by the state museum for the entirety of Title 41, Chapter 4.1, Article 4, i.e., ARS §§ 41-841 through 41-847.

5. There is no discussion of the amount of the increase.

Response: The amount of the increase is discussed within the section "Quantification of the Rate and Fee Increase" in the Notice of Intent.

6. Could better management practices, improved organization, and/or more efficient processes reduce costs? ASM does not address methods for minimizing costs, fees, rates, and increases.

Response: ASM is always looking for ways to be more efficient and more frugal, within the constraints of statutory and regulatory guidance as to what tasks must be performed and how they must be performed. ASM must also abide by ethical standards and best practices established by professional organizations, including the American Alliance of Museums. ASM reduces costs to CRM firms in many ways. One example is buying acid-free collections storage boxes at a large volume discount and providing them, at cost (\$9-\$11 each), to CRM firms for the submission of collections. Another example is the proposed use of an interest-bearing account. Use of an interest-bearing account will allow ASM to charge project proponents less than it would be able to otherwise.

Occasionally, representatives of agencies in other states ask for tours of and information about ASM's repository and other ASM mandated programs so that they may use ASM's policies, procedures, and practices as models for improvements to their own programs. Representatives of federal agencies do this on a regular basis. The United States Department of state, recognizing ASM as a national leader in archaeological repository management, recently contracted with ASM faculty and staff to share ASM mandated programs policies, procedures, and practices with cultural institutions in foreign countries.

The great size of ASM's growing curatorial backlog related to mandated services, and the rate study conducted to produce the new proposed rate and fee structure, demonstrate that ASM is not recovering the costs associated with providing these services. If anything, ASM has been too frugal for too long. Rates and fees should have increased dramatically in the past, in order to generate the operational funds necessary to provide one-time services and curation in perpetuity. That said, ASM addresses efforts to minimize costs, fees, rates, and increases both in the initial draft proposal and in the revised draft proposal. The text that follows is from the revised draft proposal:

Efforts to Avoid Fee Increases or Reduce Costs and/or Regulatory Burden

ASM's mandated mission consists of serving our stakeholders and communities in ensuring that construction or similar projects remain compliant with the regulatory framework to which they are subjected under federal and state law. Although the burden imposed upon such projects as a result of this regulatory framework is outside ASM's purview and well beyond the University's authority and control, the University and ASM have pursued several efforts to reduce the charges assessed to project sponsors in meeting our mutual responsibilities under the law.

There are substantial pools of costs that are allowable in the development of the proposed rates and fees that were not included in order to mitigate the burden borne by project sponsors and to keep charges as low as possible.

Cost Mitigation Efforts

RDI Business Support to ASM

ASM is provided accounting, human resource and other business service support by the RDI Business Center. The personnel, equipment, office supplies and other costs associated with the provision of these services were wholly excluded from the rates and fees for mandated programs in order to reduce charges to project sponsors.

Leveraging ASM Expertise

ASM, as part of the University of Arizona, is also able to leverage the expertise of its faculty and

staff in archaeology and museum conservation such that only a small percentage of each highly trained professional's effort is expended in supervising lower-cost employees who complete the great majority of the tasks comprising mandated cultural resource management services.

Compactor Shelving

ASM's utilization of compactor shelving significantly reduces the space costs associated with curation in perpetuity of both boxes of artifacts and linear feet of documentation. Excluding consideration of the necessary costs associated with environmental controls, the per-box or per-linear-foot savings from employing compactor shelving is a net present value of \$1,432.56. These savings are a direct result of the fact that compactor shelving makes 45% more efficient use of square footage of storage space than standard shelving. The cost differential between compactor and standard shelving is recuperated within the first 85 boxes of artifacts or linear feet of documentation curated, and each compactor carriage can store an average of 336 boxes or linear feet of documentation. These savings are incorporated in the proposed rates and fees, and the benefits passed on directly to the entities that engage ASM for services under mandated programs.

Future Curation in UA Warehouse

Currently all curation at ASM is carried out within two historic buildings on the University of Arizona campus. The curation fees for both boxes of artifacts and linear feet of documentation are based on facilities cost of \$25.19 per square foot per month, as calculated within the University's RCM Budget Model. This rate takes into account operations, utilities, and debt payments associated with facilities and grounds. Recently ASM submitted a 12D Funding Request through the Apache Gold Casino Resort for \$200,000 of the estimated \$1.6M necessary to secure and outfit 30,000 square feet of archaeological collections curation and research space in an off-campus facility. Once ASM is able to secure the remaining \$1.4M of funding, for which it is currently conducting a donor-based philanthropic campaign, this off-campus facility will be retrofitted to meet ASM's specific storage needs. This off-campus site will enable ASM to continue to meet its mission relating to the curation of artifacts and documents even as its historical space reaches capacity, and it is anticipated that this off-campus location can be operated at lower cost than the historical buildings that currently serve as the storage space. If realized, these cost reductions will be built into the rates and fees for mandated programs and the benefit passed through to project sponsors.

Consolidated Collections Information System

In September of 2016, ASM faculty submitted a grant proposal under the Humanities Collections and Reference Resources funding announcement offered by the National Endowment for the Humanities' division of Preservation and Access. If funded, this grant will provide \$289,502 towards the total estimated cost of \$625,628 needed to replace ASM's current antiquated information system with a modern consolidated information system. This new system will enable ASM staff to more efficiently, accurately, and adequately complete the process of cataloguing its holdings, thereby minimizing costs to projects associated with processing artifacts deposited. The simplified infrastructure of the new consolidated system is also anticipated to drive reductions in IT costs associated with server maintenance and storage.

Independent IT Assessment for Museums

In December of 2015, ASM's parent organization, the University's Office for Research, Discovery & Innovation (RDI), engaged WTC Consulting to formulate a strategy for complex networking, IT & telecommunications to be implemented across ASM, the Center for Creative Photography and the University of Arizona Museum of Art. After their analysis of server and storage infrastructures, user systems, applications and data management, and existing IT support, WTC formulated a strategy to create a shared IT support model across the three RDI units, which leveraged existing University Information Technology Services (UITS) services with targeted internal IT support. RDI and ASM are currently implementing this plan in stages, including submission of the aforementioned CCIS grant to the National Endowment for the Humanities, and a reduction in direct IT support staff. The recommendations included within the strategy have assisted in reducing the costs associated with the provision of mandated services and providing greater security to ASM's digital records.

ASM's final rate and fee proposal (posted 25 August 2017) adds updated information on ASM's efforts in fundraising to support the creation of an off-campus archaeological repository:

To date, ASM has raised more than \$245,000 and has submitted five grant proposals requesting a total of \$1M toward the estimated \$1.6M necessary to secure and outfit 30,000 square feet of archaeological collections curation and research space in an off-campus facility. Once ASM is able to secure the remaining funding, this off-campus facility will be retrofitted to meet ASM's specific storage needs. This off-campus site will enable ASM to continue to meet its mission relating to the curation of artifacts and documents even as its historical space reaches capacity, and it is anticipated that this off-campus location can be operated at lower cost than the historical buildings that currently serve as the storage space. If realized, these cost reductions will be built into the rates and fees for mandated programs and the benefit passed through to project sponsors.

ASM and the UA Office for Research, Discovery, and Innovation (RDI), the unit to which ASM reports, are currently engaged in a number of efforts that could potentially lower costs and, therefore, lower ASM's fees and rates. RDI has initiated a process-mapping project to help streamline ASM business practices; ASM has recently completed time-saving upgrades to its existing collections database (while awaiting acquisition and implementation of a new system) and has planned additional upgrades to be implemented before 1 July 2018; and RDI has initiated the transition of ASM's digital collections to less expensive storage models.

7. It is unclear what the methodology is for calculating costs.

Response: Costs are all based upon salary information in the University of Arizona's system of record or upon documentation of historical transactions entered into by ASM for goods and services necessary to provide mandated services.

8. There is no breakdown in terms of the tasks assigned to different labor pools and the appropriateness of these assignments cannot be evaluated.

Response: As discussed in the draft Notice, ASM is subject to many regulations that dictate services to be provided, professional standards by which they must be provided, for which service charges may be assessed, and even who must bear the burden of the costs of such services.

This regulatory framework includes:

- Curation of Federally Owned and Administered Archeological Collections, 36 CFR 79;
- State law, including but not limited to ARS §§ 15-1631, 41-865 and 41-841, et seq.;
- ABOR Policy, including but not limited to 8-101 through 8-110 and 8-201 through 8-207; and
- Professional Standards as set out by the American Alliance of Museums.

The ASM Director and professional staff are responsible for determining the appropriate staff classification for completion of a given task in order to ensure compliance with the aforementioned obligations and standards. Because our goals are to serve our stakeholders efficiently and to keep costs as low as possible, much of the day-to-day, hands-on work is indeed performed by lower-cost employees, and then reviewed by senior personnel to ensure compliance with the statutory obligations and professional standards previously mentioned. However, there are certain activities (e.g., those that require more training or experience to conduct) that entail the direct effort of professional staff.

ASM, as part of the University of Arizona, is able to leverage the expertise of its faculty and staff in archaeology and museum conservation such that only a fraction of each highly trained professional's effort is expended in supervising lower-cost employees who complete the great majority of the tasks required for mandated cultural resource management services.

9. Simple, straightforward standards for collections submission would save ASM labor costs by preventing duplication of effort.

Response: ASM does not perform the same tasks required of those submitting collections for curation. ASM, as a public repository pursuant to ABOR Policy 8-204(H), has the following responsibility:

All specimens and records resulting from the permitted activity must be accessioned, inventoried, and fully documented by the repository. Accession and catalog records are considered to be part of the records that must be permanently preserved.

The lists provided below include tasks completed by ASM staff, rather than staff of CRM firms or others submitting collections, for curation (many of these appeared in the draft and revised notices).

Partial List of Tasks Completed by ASM Staff as Part of Collections Intake (Bulk Boxes):

- Reviewing the structure of the submitted electronic database, confirming it is compatible with ASM structure, loading it onto a server, and making format changes for upload into ASM's Collections Information System (CIS) software.
- Checking the contents of boxes against the inventory provided.
- Rehousing bulk material collections, using new bags and bag labels (tags), if necessary.
- Making hard-copies of the checked inventory data and distributing them to the individual boxes, the project accession file, and the repository files.
- Entering data about the collection into the CIS Box Collection table.

- Transferring the boxes to a collections storage area.
- Recording new storage locations for boxes, including updating the project accession file and the CIS.

Partial List of Tasks Completed by ASM Staff as Part of Collections Intake (Individually Catalogued Objects):

- Laying out individual objects and matching them to the submitted inventory and the submitted report illustration and/or text.
- Generate a unique catalog number for each item and label all pieces (if not previously done by those submitting the collection for curation)
- Creating a tracking document to locate each object and its progress through the cataloguing process.
- Creating digital images for documentation in the CIS and on Catalog Cards, including editing and labeling each image according to ASM guidelines .
- Creating a CIS Image Project record for the project (not each image).
- Creating a digital catalog card template for the project.
- Generating and customizing a catalog card for every individual specimen.
- Completing a descriptive record, documenting the recovery context, recording measurements, and embedding digital images into each catalog card.
- Editing draft catalog cards.
- Printing cards - double sided.
- Creating a CIS entry for each specimen.
- Creating museum-quality storage mounts when necessary.
- Generating storage inventory sheets.
- Recording storage locations in the CIS and on each catalog card.

In processing the collection, ASM staff may identify (based on best practices, accepted standards, and knowledge/expertise) objects not previously identified by those submitting the collection for curation as requiring individual cataloguing. Such objects must be catalogued.

By way of comparison, the tasks required of CRM firms in advance of submitting collections for curation, as detailed in the ASM Repository Manual (Griset et al. 2004), Sections 2.1 through 7.7, include:

- appropriate cleaning of all artifacts submitted (unless cleaning would cause damage or, in the case of selected specimens, such action would hamper scientific analyses, e.g., residue analysis);
- minimal efforts to stabilize objects in need of stabilization;
- labeling each individually catalogued item with its unique number (according to ASM standards);
- labeling bulk material with an accession number and field specimen number (according to ASM standards);
 - bulk items smaller than the size of a U.S. quarter coin are excepted from this rule, and need not be labeled.
 - for larger collections of bulk material (e.g., a large bag of 30 or more small sherds, a bag of 60 pieces of debitage), at least 10% of the items in the bag must be labeled.
- organizing the collection physically, according to site, major artifact class or analytical category, and intrasite provenience;
- inventorying the collection and producing inventory forms for each box, as well as an electronic and paper inventory of the entire collection;

- documentation of individually catalogued objects:
 - catalog number
 - object name (e.g., reconstructed Sacaton Red-on-buff jar)
 - number of specimens associated with each catalog number (e.g., 1 complete jar, 1 partial jar comprising 3 sections, 25 stone beads)
 - brief description of the object's significance (i.e., why it was selected for cataloguing)
 - associated image or illustration number in report;
- packing the artifact collection according to ASM standards, using archival quality materials;
- physically organizing and inventorying photographic images (including digital images);
- providing documentation for each image:
 - date of image
 - field number
 - subject (description of archaeological structures, features, procedures, equipment, artifacts, etc., as well as the names of any individuals in the photograph)
 - provenience (site number, site name, intrasite provenience, and orientation from which the photograph was taken, i.e., looking to the Northwest ; include site-specific units of designation such as features, floor numbers, burial numbers, grid numbers, etc.)
 - photographer's full name;
- packing the photographic image collection according to ASM standards, using archival quality materials (if prints and negatives are present);
- physically organizing and inventorying all associated archival material (e.g., field notes, field forms, maps, profiles);
- providing documentation for each item of archival material, e.g.:
 - project name and project number
 - project map field number, if assigned
 - name of cartographer
 - date map was drafted
 - ASM site number and site name, if assigned
 - north arrow and scale
 - brief description of the map or profile
- packing the archival material according to ASM standards, using archival quality materials; and
- assigning box numbers and affixing numbered box labels with required information.

10. ASM should adopt bar-coding to save money.

Response: ASM, as an affiliate of the Smithsonian Institution, occasionally sends staff and/or faculty to Washington, D.C. to participate in trainings related to best practices, new methods, and new technologies. In 2014, ASM sent a repository curator to the Smithsonian (using donated funds) to learn about bar-coding and to evaluate the potential for applying this technology at ASM. Although bar-coding has its benefits, in terms of inventory control, among museum professionals, there is no consensus that bar coding actually saves time or money for collections managers, as the system is only as good as the keyboarded information associated with each code. ASM determined that the investment in software, bar code stickers, bar code reading devices, and the keyboarding necessary to populate a new database would be expensive and would add to the fees charged by the museum. ASM decided to forestall investment in such as system until after it addressed more urgent concerns, such as securing enough

space and purchasing enough shelving to continue accepting repository collections. If ASM adds bar-coding to its processes, the additional costs associated with this system will be passed on to project proponents.

11. Do ASM personnel travel as part of their duties? Will the proposed increases pay for this?

Response: Yes, ASM personnel travel as part of their duties. No travel costs were included within the calculated rates. Costs of travel associated directly with a single project will be passed through directly to that project. This is neither a rate nor a fee and was, therefore, left out of prior discussions.

12. Why mention AZSITE, NAGPRA, and permits if these expenses are not part of the structure?

Response: These programs are discussed in order to demonstrate that the costs associated with them were considered, measured and intentionally excluded from the calculation of rates associated with the provision of mandated programs services. This is discussed in both the initial draft proposal and the revised draft proposal.

13. None of the costs discussed in the proposal are adequately defined.

Response: A reasonable knowledge of business and economic activities was assumed in the preparation of the required documentation. The information provided therein is readily understandable to a reasonably informed user.

14. Why charge for archival materials if collections are submitted in archival materials?

Response: ASM provides acid-free boxes to CRM firms for submission of collections and must recover the associated cost. Each of these boxes costs between \$9 and \$11, and ASM reduces costs to CRM firms by buying them at a large volume discount. Also, portions of an object collection are often submitted incorrectly (e.g., over weight limit) and must be rehoused properly in archival materials. Associated documents are submitted in acid free boxes but not acid-free folders. ASM transfers them into acid-free folders and other containers during the inventory process. Although archival quality materials will last many years, they will not last forever, and they must be replaced.

15. Why assume shelving will only last 20 years?

Response: Twenty years is a conservative estimate of the economic life of these assets, as well as being the useful life of the assets, which dictates the annual depreciation expense. Additionally, compactor shelving has a shorter expected life due to the fact that it has moving parts and is therefore far more susceptible to degradation than traditional shelving.

16. ABOR is required to set aside space for ASM and these costs should be borne by ABOR, not project sponsors.

Response: ARS § 15-1631 simply states that ABOR shall set aside space for ASM. There is no indication or mandate that ABOR must bear the cost of this space.

17. Will these “Allowable Costs Not Included” be included in the future? Nothing ensures that they will not.

Response: That is correct. There is nothing that ensures that in future calculations these costs will not be included within rates. Assuming no change in legislation, if future rate increases are sought, ASM will complete this process once more, and show these as costs included within the rates, if that is their wish.

18. Will the cost of the retrofit be passed along to project proponents if funding is not found?

Response: The costs of the retrofit are not currently contained within the proposed rate structure. If funding is not found, ASM will need to determine whether it is in its best interest to submit another Notification of Intent to Increase Rates and Fees in order to recoup some of the costs of the retrofit.

19. Who will pay the costs of moving collections to the new facility?

Response: Moving of collections between facilities has nothing to do with completion of projects, and will therefore not be charged to CRM companies or project proponents.

20. It is more expensive to register a project than to excavate a burial. This seems incorrect and all the rates seem high.

Response: This comment appears to reflect a misunderstanding of the costs for project registration and burial excavation discussed in the draft proposal. The figures cited in the draft proposal are examples and they assume a certain minimum or average number of hours for each given task. Actual costs (based on estimated time to complete) will be billed, and in many cases, a burial excavation will be more expensive than project registration.

21. The curation costs are too high and are not justified.

Response: ASM argues that the rate study, the data presented in the initial and draft proposals, and the responses to both rounds of public comment justify the proposed rates and fees.

22. The costs for burial agreements and consultation are too high, as these mostly are boilerplate.

Response: This comment appears to reflect a misunderstanding of the costs for burial agreements and consultation discussed in the draft proposal. The figures cited in the draft proposal are examples and they assume a certain minimum or average number of hours for each given task. Actual costs (based on estimated time to complete) will be billed, and in some cases, burial agreements and consultation will cost less than the examples given. Costs differ dramatically depending upon whether or not the burial agreement or consultation involves the development of a project-specific or a general burial agreement and based on the number of tribes involved.

23. There is no evidence that this proposal is responsive to the concerns of stakeholders.

Response: Stakeholders repeatedly requested, in meetings held at the state capitol and at ASM, a rate and fee structure that scaled costs to project scope through direct billing of time, such that an individual

project proponent will not be paying costs associated with projects sponsored by other proponents. This is the essence of the structure ASM has proposed (time-based versus task-based recovery of costs).

In addition, it is important to note that in the revised draft rate and fee proposal, ASM has reduced the unit bases in the rate and fee structure in response to stakeholder input. The half-box will be used as a minimum billing unit (for charges related to objects) in situations where ASM deems appropriate, and the linear inch (rather than the linear foot) will be used as a minimum billing unit to recover costs associated with the curation of documents in perpetuity.

Further, in terms of associated business practices, based on stakeholder input:

- ASM has committed to scope-dependent quotes for services, reducing budgetary uncertainty for project proponents, agencies, and CRM firms.
- ASM is developing an easy-to-use, online questionnaire for stakeholders to request quotes.
- ASM has committed to a two-day turn-around in issuing quotes.
- ASM has waived previous plans to require a 15% deposit for estimated costs associated with all services to be provided up to collections intake and in-perpetuity curation.
- ASM has changed its proposed billing system. Instead of monthly billing events for each job, ASM now proposes a two-bill cycle. The initial billing event will occur when a quote is accepted by the client. This billing will cover the costs of activities undertaken by ASM to complete work up to the point of collections intake. The second billing event will be triggered at the time of collections intake for projects curated at ASM, and at the completion of work for all other projects. The second billing will cover collections intake (processing) and curation in perpetuity (objects and documents) for projects curated at ASM. The second billing event will cover the cost of document curation for projects generating objects not curated at ASM.
- ASM has committed to a policy of returning collections not submitted in accordance with state standards (Griset et al. 2004). However, ASM will still have to recoup costs associated with time spent determining that collections have been submitted improperly, in addition to the costs assessed for final intake and curation of those materials once re-submitted. Given current staffing levels ASM cannot commit to a one-week turnaround for this process. ASM will commit to a one-month turnaround for returning improperly submitted collections.

24. The proposed rate and fee structure is not transparent.

Response: A reasonable knowledge of business and economic activities was assumed in the preparation of the required documentation. The information provided therein is readily understandable to a reasonably informed user.

25. Many services provided by ASM involve tasks that are repetitive, time-consuming, and lend themselves to automation.

Response: ASM is unaware of any automated systems for completing the tasks required under statute and regulation (e.g., inventorying the contents of boxes, cataloguing objects, rehousing collections, entering information into databases, adapting submitted data to ASM standards). ASM is unaware of any archaeological repository in the country that is automated.

26. It is not clear that the new curation facility will be less expensive to operate (no data are provided in support of this claim).

Response: The draft proposal contrasts, in a general sense, the costs associated with maintaining space and equipment (as well as utilities costs) in two historic on-campus buildings (built in the 1920s and the 1930s) with similar categories of costs associated with newly constructed space.

27. It is not clear that anyone will benefit from the increases proposed.

As stated in the initial draft proposal (and later drafts), the entities who will directly benefit from the proposed rate and fee increases are project sponsors and the people of the state of Arizona, including the state's tribal communities. Project sponsors will benefit from the greater predictability, transparency, and scalability in charges for ASM to provide the mandated cultural resource management services that support and enable their commercial, residential, and infrastructure development projects to proceed under federal and state law. The people of Arizona, including the state's tribal communities, will benefit not only from the development projects facilitated by ASM's mandated mission, but also in that the information and objects recovered as a result of archaeological activities in advance of development will be studied, documented, and curated in perpetuity for ongoing research and use in educational programs and exhibitions, in compliance with federal and state law.

Second Round Comments and Responses:

1. ASM ignored the Arizona Game and Fish Department's comments.

Response: The Arizona Game and Fish Department submitted 27 specific comments (depending upon how one counts comments) during the first public comment period. ASM addressed at least 17 of these, either within the draft proposal itself, in its response to first-round public comments, or in both documents. Many were addressed in responses to general (summary) public comments, but some were listed as specific public comments and addressed. Those not addressed in the response to first-round comments fell into four categories: (1) statements that are simply untrue (e.g., the contention that state statute does not address curation costs, only costs associated with services related to human burials; see above); (2) value judgements with which ASM disagrees (i.e., the suggestion that no one will benefit from the proposed fee and rate increases that will cover the costs of meeting ASM's mandated mission); (3) questions relating to allowable costs not included in the rate and fee study (and therefore not being recovered from project proponents); and (4) vague, unsupported statements regarding the purported cost-savings associated with certain processes, such as bar-coding. Each of these 27 specific comments is addressed above.

2. There were 115 pages of comments submitted to ASM and only 10 pages of responses.

Response: To be precise, the 115 pages include 36 pages of public comments and a single title page. One of the public comments was accompanied by 7 appendices. These appendices, together, are 78 pages in length (including 14 blank pages and 7 appendix title pages). One of the appendices consists of a 31-page research paper published by the National Park Service, and 25 of the remaining appendix pages that bear text were generated by ASM or RDI (historical ASM curation fee data, ASM budgetary data, and a PowerPoint presentation from one of the stakeholder meetings held at ASM).

3. The proposed increases are not justified.

Response: We realize that what constitutes justification to some individuals is simply outside the realm of possibility. ASM contends that the documentation presented meets generally accepted standards.

4. The proposed structure is not transparent.

Response: A reasonable knowledge of business and economic activities was assumed in the preparation of required documentation. The information provided therein is readily understandable to a reasonably informed user.

5. It is unclear if the revised draft proposal meets the requirements of statute.

Response: ASM contends that the revised draft proposal meets or exceeds statutory requirements.

Reference Cited

Griset, Suzanne, Arthur W. Vokes, and Catherine Sarther, with contributions by Teresa Moreno 2004 *Requirements for the Preparation of Archaeological Project Collections for Submission to the Arizona State Museum*. Collections Division, Arizona State Museum, University of Arizona, Tucson.

http://www.statemuseum.arizona.edu/media/statemuseum/file/repository_manual.pdf