



Charges decision made under the *Freedom of Information Act 1982*

Decision and reason for decision of Position Number 62210022, Information Law Section, Legal Services and General Counsel Branch, Department of Veterans' Affairs

Applicant: Verity Pane

Charges Notice issued: 24 October 2018

Decision date: 2 November 2018

FOI reference number: FOI 24762

Issued by email: foi+request-4847-b4c684a7@righttoknow.org.au

Dear Verity Pane,

Freedom of Information Request: FOI 24762

1. I have made a decision to impose a charge in the amount of \$217.41. This takes into account a 25 per cent reduction of the overall charge of \$289.88 on the grounds of public interest. A deposit of \$54.35 is required.

Authority to make this decision

2. I, Position Number 62210022, Assistant Director, Information Law Section, am an officer authorised by the Secretary of the Department of Veterans' Affairs (the Department) to make decisions about access to documents in the possession of the Department in accordance with section 23(1) of the *Freedom of Information Act 1982* (the FOI Act).

Summary

3. On 27 September 2018, you made a request for the Department to create a document from data in the possession of the Department. Your request sought access to:

"...In light of recent media reporting and admissions by the Minister in Federal Parliament that the Department spent more than \$0.6m in external legal services fees in regards to just one veteran - Martin Rollins - in relation to DVA's deliberate backdating of a rewrite of a DVA policy to exclude Mr Rollins' receiving a benefit he was entitled to at the time of his applying for it (<http://www.abc.net.au/7.30/dva-secretly-...>) there is a public interest in understanding how

the Department is expending public funds on external legal services.

While the Department reports just one summary total of expenditure on external legal services in its annual reports, this is clearly insufficient and far too opaque to understand what the Department is spending on external legal costs for individual matters. While this information does indicate the Department spends between \$7m - \$10m on external legal services roughly every financial year, it gives no indication whether it may relate to only a small number of individual veterans or many or what the Department roughly spends per legal issue - which is important to understand when considering if the claims that the Department is combative and litigious are overstated or not.

Certainly the recent admission (initially refuted) that the Department has spend in excess of half a million dollars, litigiously, to defend this backdated change of policy to deny Martin Rollins a benefit that existed at the time he applied for it (and ironically this legal expenditure many hundreds of thousands of dollars greater than the benefit he was otherwise entitled to receive), raises public interest questions whether such excessive external legal expenditure is endemic or is a one off isolated case.

To that end, under FOI, I seek under s 17 of the FOI Act for a summary document to be created (so as to avoid unnecessary disclosure of irrelevant Departmental information) from data in the Departments financial and information management systems, to break down these global external legal services expenditure, so that greater transparency is given.

I seek a breakdown to be provided for the month of June 2018 - to be broken down to matters involving individual veterans and other. Where matters involved individual veterans, this should be further broken down to stating the cumulative external legal services expenditure per veteran involved (with each veteran referred to by pseudonym - so first veteran is Veteran A, next is Veteran B, and so on). An example of the layout I seek is below:

*.....June 2018\$.....
Other
Veteran A
Veteran B
etc..."*

4. On 24 October 2018, the Department provided you with a Charges Notice, advising an estimate of a charge in the amount of \$413.47. You were also advised that a deposit of \$103.37 was required before any further action could be taken on your request.
5. On 25 October 2018, you sent an email disputing the charge. You specifically noted:

"...Charges levy of \$413.47 made by DVA for one recent month (July 2018) of external legal services expenditure data

<https://www.righttoknow.org.au/request/4847/response/13318/attach/4/FOI%2024762%20Charges%20notice.pdf>

Contrast to charges levy of \$690.75 made by DVA for same data, but for the whole of FY15/16, which included according to submissions made by DVA to the OAIC, the need to access offsite storage due to the age of the financial year.

<https://www.righttoknow.org.au/request/4697/response/13131/attach/3/FOI%2023544%20Charges%20Decision.pdf>

Again, DVA's charges levies have little to do with the actual work involved, but rather are a measure of how much DVA dislikes the applicant and the topic of the FOI, contrary to the Act.

The wild discrepancies between calculations confirm this - the actual cost of providing one month of identical data does not equate to 2/3rds of 12 months of exactly the same type of data. Relevantly, the prior FOI was one where DVA practically refused the request for three financial years of data, because it would take 60 hours, but when scope was reduced to just one financial year, said it would take 40 hours, despite the reduction in two thirds in scope.

Again, even DVA would be hard pressed to ignore these discrepancies and clearly these grossly inflated charges levied are made in intentional bad faith, which is an ongoing consistent theme with DVA (and perhaps why your Secretary has to apologise for the Department's conduct multiple times a year)

The charges levy is challenged ..."

Material taken into account

6. In accordance with section 26(1)(a) of the FOI Act, my findings on any material question of fact, the material on which those findings were based and the reasons for my decision to apply a charge to process your request follows.
7. I have taken the following material into account in making my decision:
 - the terms of your request;
 - the Charges Notice, dated 24 October 2018;
 - your correspondence contending the Charges Notice, dated 25 October 2018;
 - the ease in which the Department can retrieve the data/information you have requested to create a document that does not already exist;
 - the content of the document that falls within the scope of your request once the document is created;

- information received by the relevant business area about the work involved in creating the document you have requested;
- sections 3, 11 and 11A of the FOI Act which give the Australian community a legally enforceable right to obtain access to information held by the Government of the Commonwealth. I also considered section 29 of the FOI Act (Charges) relevant to my decision;
- the *Freedom of Information (Charges) Regulations 1982* (Charges Regulations); and
- the Guidelines issued by the Australian Information Commissioner under section 93A of the FOI Act (FOI Guidelines).

8. A full extract of all FOI Act provisions used to make my decision are provided in **Schedule 1**.

Decision

9. I have made a decision to impose a charge in the amount of \$217.41. This takes into account a 25 per cent reduction of the overall charge of \$289.88 on the grounds of public interest. A deposit of \$54.35 is required.

Reasons for Decision

10. Section 29 of the FOI Act provides that charges can be imposed for processing requests. Unless a decision is made to waive the processing charge in whole or in part, the combined effect of section 11A(1)(b) of the FOI Act and Regulation 11(1) of the Charges Regulations is that an applicant is required to pay any charge before any access is given.

11. The Charges Regulations specify different rates for the various activities involved in processing a request with the first five hours of decision-making time free for all FOI applicants.

Is the charge wrongly assessed?

12. As noted above, you are of the view that “...DVA’s charges levies have little to do with the actual work involved, but rather are a measure of how much DVA dislikes the applicant and the topic of the FOI, contrary to the Act...”

13. You also made comments about another FOI request where you asked the Department to create another document under section 17 of the FOI Act. This was for similar data but relating to the entire 15/16 Financial Year as opposed to one month in the 17/18 Financial Year which is the subject of this current request. Those charges were the subject of FOI 23544 and the subsequent internal review of FOI 24804. Charges in all these matters are essentially based on the number of line items (e.g. payments) that need to be investigated and then arranged in the format you have requested. Each month contains a different number of line items and as such, the work involved for each month

and each FOI request will differ. The number of line items that apply to this current request total 84, whereas the number of line items applicable to the other FOI matter total 1,443. As noted to you in the internal review decision, the charge applied at the primary decision was incorrect and the charge was subsequently rectified at internal review.

14. Part 4 of the FOI Guidelines state that an agency or minister can impose a charge that does not exceed the actual costs incurred by the agency or minister in:
- retrieving and collating information stored on a computer or on like equipment (Charges Regulations, Schedule, Part I, Item 3);
 - retrieving and collating information stored on a computer and using the computer or other equipment to make deletions from the record of the information (Schedule, Part II, Item 4) producing a computer tape or disk (Schedule, Part II, Item 4A);
 - arranging for an applicant to hear a recording or view a stored image (Schedule, Part II, Item 5) producing a copy of a recording, film or videotape (Schedule, Part II, Item 6);
 - posting or delivering a document to an applicant, as requested by the applicant (Schedule, Part II, Item 8).
15. In calculating processing charges for FOI requests, the Department applies relevant provisions of the Charges Regulations, FOI Act and FOI Guidelines in relation to the amounts it is permitted to charge.
16. In matters where an applicant requests the Department to create a document in accordance with section 17 of the FOI Act, Part I, Item No 3 of the Charges Regulations Schedule provides that:
- “Where the request, being a request made to an agency, is in respect of information that is not available in discrete form in documents of the agency – a charge in respect of the production of a document containing the information in discrete form by the use of a computer or other equipment that is ordinarily available to the agency for retrieving or collating stored information”*
- then the amount of rate of charge applicable is:
- “an amount not exceeding the actual cost incurred by the agency in producing the document”*
17. The FOI Guidelines at [4.3], state that a Department has the discretion to impose or not impose a charge. You have requested the Department to create a document for you. In this instance, the Department has used its discretion to impose a charge to process your request.
18. The Charges Notice took into account the actual costs incurred for staff to retrieve, search and create the document you have sought under section 17 of the FOI Act. I have reconsidered the amount of time it will take to search through each line item relating to June 2018 and note that there are in fact

84 line items that will need to be searched, not 61 line items as estimated. Although this is greater than advised in the preliminary assessment, I have reduced the time required to investigate each item from 3 to 2 minutes. I have also separated the task of retrieving the initial data and sorting through the data to gain a more accurate reflection of the stages of work required. This has decreased the overall estimated time, and as such, the applicable charge.

19. I am of the view that the hours involved to process your request, as highlighted at **Schedule 2**, remain conservative. The charges applied take into account Part I, item 3 of the Charges Regulation Schedule. This item enables the Department to charge for actual costs associated with processing a request in respect of information that is not available in a discrete form. In this case, it relates to your request for the Department to collate data and arrange it in the format you have requested; by asking the Department to create the document under section 17 of the FOI Act.
20. As I have detailed at **Schedule 2**, the Department will charge for the actual costs involved for an EL1 and APS6 to process your request. The hourly rates applicable to these staff are set by and derived from the Department's Enterprise Agreement. The costs incurred for decision-making remain at the set rate.
21. As such, I am satisfied the charge has been correctly assessed.

Would charges cause financial hardship?

22. As you have not advised that payment of the charge would cause you financial hardship, I have not considered a waiver or reduction on the basis of financial hardship.

Is giving access to the document(s) in the public interest?

23. As noted above, you are of the view that there is public interest in the information you seek access to.
24. Part 4 of the FOI Guidelines detail factors I must take into consideration when considering whether public interest may apply. As mentioned in those guidelines, the issue is not whether it is in the public interest to reduce or not to impose a charge, nor whether it is in the public interest for a particular applicant to be granted access to a document. While you as the applicant may benefit from disclosure of the documents, the question is whether there is a benefit that will flow more broadly to the public or substantial section of the public if the documents are to be released to you.
25. In deciding whether giving access to the documents is in the general public interest or in the interest of a substantial section of the public I have considered both the content of the documents [content of the document once created], and the context of its release.
26. I have considered:
 - whether giving access to the document in question is in the general public interest or in the interest of a substantial section of the public;

- the public interest argument you put forward as detailed above;
- whether disclosure would advance the objects of the FOI Act;
- whether you can be expected to derive a commercial or personal benefit or advantage from being given access to the documents and if it is reasonable to expect you to meet all or part of the charge;
- whether the document is primarily of interest only to you and is not of general public interest or of interest to a substantial section of the public; and
- whether information in the documents has already been published by or commented on by the Department and the documents do not add to the public record.

27. Based on the above, I have decided that reducing the charge for disclosure of the document in question is in the general public interest or in the interest of a substantial section of the public, for the purpose of a decision in accordance with section 29(5)(b) of the FOI Act, but that this interest does not warrant a full waiver of the charge. As such, the charge has been reduced by 25 per cent to bring the total amount payable to **\$217.41**.

Your liability to pay a charge

28. As the charge is more than \$100.00, you will need to pay a deposit of **\$54.35** (which is 25 per cent of the total charges applying to your request) before further action can be taken on your request. This amount is set in Regulation 12(2)(b) of the Charges Regulations.
29. The deposit is not refundable except in some limited circumstances (for example, if the Department fails to make a decision on your request within the statutory time limit), or may be refundable in part if the final charge is less than the deposit paid.
30. On payment of the charge in full, or the required deposit, processing of your request will commence. Payment can be made by:

(a) forwarding a cheque for the required amount to:

Post: Legal Services & Assurance Branch, Department of Veterans' Affairs
 GPO Box 9998, Canberra ACT 2601
Required Reference: FOI24762/Verity Pane

Or

(b) paying by electric funds transfer directly into the Department's banking account using the following details:

Account name: Reserve Bank of Australia
BSB: 092009
Account number: 112084
Required Reference: FOI24762/Verity Pane

Access to the document requested

31. The Department will continue to process your request once the deposit (or the full charge if you prefer) is received. If you pay the deposit, the document will not be released to you until payment of the remaining charge has been made.
32. Please note that payment of a charge does not guarantee full access to the document.

Your rights of review

33. If you are dissatisfied with my decision, you may apply for internal review or Information Commissioner review of the decision. We encourage you to seek internal review as a first step as it may provide a more rapid resolution of your concerns.

Internal Review

34. Under section 54 of the FOI Act, you may apply in writing to the Department for an internal review of my decision. The internal review application must be made within 30 days of the date of this letter. Where possible please attach reasons why you believe review of the decision is necessary. The internal review will be carried out by another officer within 30 days.
35. You can make your application for internal review in one of the following ways:

Post: Legal Services & Assurance, Department of Veterans' Affairs
GPO Box 9998, Canberra ACT 2601
Facsimile: (02) 6289 6337
Email: information.access@dva.gov.au

Information Commissioner Review

36. Under section 54L of the FOI Act, you may apply to the Australian Information Commissioner to review my decision. An application for review by the Information Commissioner must be made in writing within 60 days of the date of this letter, and be lodged in one of the following ways:

Online: www.oaic.gov.au

Post: Office of the Australian Information Commissioner

GPO Box 5218, Sydney NSW 2001

Facsimile: (02) 9284 9666

Email: enquiries@oaic.gov.au

In person: Level 3, 175 Pitt Street, Sydney NSW.

37. More information about your review rights under the FOI Act is available in Fact Sheet 12 published by the Office of the Australian Information Commissioner: <http://oaic.gov.au/freedom-of-information/foi-resources/freedom-of-information-fact-sheets/foi-factsheet-12-your-review-rights>

Contact us

38. If you wish to discuss this decision, please do not hesitate to contact the Information Law Section using the following details:

Post: Legal Services & Assurance, Department of Veterans' Affairs

GPO Box 9998, Canberra ACT 2601

Facsimile: (02) 6289 6337

Email: information.law@dva.gov.au

Yours Sincerely,

Position Number 62210022

Assistant Director

Information Law Section | Legal Services & General Counsel Branch

Legal Assurance and Governance Division

2 November 2018



Schedule of relevant provisions in the FOI Act

3 Objects—general

- (1) The objects of this Act are to give the Australian community access to information held by the Government of the Commonwealth or the Government of Norfolk Island, by:
 - (a) requiring agencies to publish the information; and
 - (b) providing for a right of access to documents.
- (2) The Parliament intends, by these objects, to promote Australia's representative democracy by contributing towards the following:
 - (a) increasing public participation in Government processes, with a view to promoting better informed decision-making;
 - (b) increasing scrutiny, discussion, comment and review of the Government's activities.
- (3) The Parliament also intends, by these objects, to increase recognition that information held by the Government is to be managed for public purposes, and is a national resource.
- (4) The Parliament also intends that functions and powers given by this Act are to be performed and exercised, as far as possible, to facilitate and promote public access to information, promptly and at the lowest reasonable cost.

11 Right of access

- (1) Subject to this Act, every person has a legally enforceable right to obtain access in accordance with this Act to:
 - (a) a document of an agency, other than an exempt document; or
 - (b) an official document of a Minister, other than an exempt document.
- (2) Subject to this Act, a person's right of access is not affected by:
 - (a) any reasons the person gives for seeking access; or
 - (b) the agency's or Minister's belief as to what are his or her reasons for seeking access.

11A Access to documents on request

Scope

- (1) This section applies if:
 - (a) a request is made by a person, in accordance with subsection 15(2), to an agency or Minister for access to:
 - (i) a document of the agency; or
 - (ii) an official document of the Minister; and
 - (b) any charge that, under the regulations, is required to be paid before access is given has been paid.
- (2) This section applies subject to this Act.

Note: Other provisions of this Act are relevant to decisions about access to documents, for example the following:

- (a) section 12 (documents otherwise available);
- (b) section 13 (documents in national institutions);
- (c) section 15A (personnel records);
- (d) section 22 (access to edited copies with exempt or irrelevant matter deleted).

Mandatory access—general rule

- (3) The agency or Minister must give the person access to the document in accordance with this Act, subject to this section.

Exemptions and conditional exemptions

- (4) The agency or Minister is not required by this Act to give the person access to the document at a particular time if, at that time, the document is an exempt document.

Note: Access may be given to an exempt document apart from under this Act, whether or not in response to a request (see section 3A (objects—information or documents otherwise accessible)).

- (5) The agency or Minister must give the person access to the document if it is conditionally exempt at a particular time unless (in the circumstances) access to the document at that time would, on balance, be contrary to the public interest.

Note 1: Division 3 of Part IV provides for when a document is conditionally exempt.

Note 2: A conditionally exempt document is an exempt document if access to the document would, on balance, be contrary to the public interest (see section 31B (exempt documents for the purposes of Part IV)).

Note 3: Section 11B deals with when it is contrary to the public interest to give a person access to the document.

- (6) Despite subsection (5), the agency or Minister is not required to give access to the document at a particular time if, at that time, the document is both:
 - (a) a conditionally exempt document; and
 - (b) an exempt document:
 - (i) under Division 2 of Part IV (exemptions); or
 - (ii) within the meaning of paragraph (b) or (c) of the definition of exempt document in subsection 4(1).

23 Decisions to be made by authorised persons

- (1) Subject to subsection (2), a decision in respect of a request made to an agency may be made, on behalf of the agency, by the responsible Minister or the principal officer of the agency or, subject to the regulations, by an officer of the agency acting within the scope of authority exercisable by him or her in accordance with arrangements approved by the responsible Minister or the principal officer of the agency.
- (2) A decision in respect of a request made to a court, or made to a tribunal, authority or body that is specified in Schedule 1, may be made on behalf of that court, tribunal, authority or body by the principal officer of that court, tribunal, authority or body or, subject to the regulations, by an officer of that court, tribunal, authority or body acting within the scope of authority exercisable by him or her in accordance with arrangements approved by the principal officer of that court, tribunal, authority or body.

26 Reasons and other particulars of decisions to be given

- (1) Where, in relation to a request, a decision is made relating to a refusal to grant access to a document in accordance with the request or deferring provision of access to a document, the decision-maker shall cause the applicant to be given notice in writing of the decision, and the notice shall:
 - (a) state the findings on any material questions of fact, referring to the material on which those findings were based, and state the reasons for the decision; and
 - (aa) in the case of a decision to refuse to give access to a conditionally exempt document—include in those reasons the public interest factors taken into account in making the decision; and

Note: Access must generally be given to a conditionally exempt document unless it would be contrary to the public interest (see section 11A).

- (b) where the decision relates to a document of an agency, state the name and designation of the person giving the decision; and

- (c) give to the applicant appropriate information concerning:
 - (i) his or her rights with respect to review of the decision;
 - (ii) his or her rights to make a complaint to the Information Commissioner in relation to the decision; and
 - (iii) the procedure for the exercise of the rights referred to in subparagraphs (i) and (ii); including (where applicable) particulars of the manner in which an application for internal review (Part VI) and IC review (Part VII) may be made.
- (1A) Section 13 of the Administrative Decisions (Judicial Review) Act 1977 does not apply to a decision referred to in subsection (1).
- (2) A notice under this section is not required to contain any matter that is of such a nature that its inclusion in a document of an agency would cause that document to be an exempt document.
(see section 11A).

29 Charges

- (1) Where, under the regulations, an agency or Minister decides that an applicant is liable to pay a charge in respect of a request for access to a document, or the provision of access to a document, the agency or Minister must give to the applicant a written notice stating:
 - (a) that the applicant is liable to pay a charge; and
 - (b) the agency's or Minister's preliminary assessment of the amount of the charge, and the basis on which the assessment is made; and
 - (c) that the applicant may contend that the charge has been wrongly assessed, or should be reduced or not imposed; and
 - (d) the matters that the agency or Minister must take into account under subsection (5) in deciding whether or not to reduce, or not impose, the charge; and
 - (e) the amount of any deposit that the agency or Minister has determined, under the regulations, that the applicant will be required to pay if the charge is imposed; and
 - (f) that the applicant must, within the period of 30 days, or such further period as the agency or Minister allows, after the notice was given, notify the agency or Minister in writing:
 - (i) of the applicant's agreement to pay the charge; or
 - (ii) if the applicant contends that the charge has been wrongly assessed, or should be reduced or not imposed, or both--that the applicant so contends, giving the applicant's reasons for so contending; or
 - (iii) that the applicant withdraws the request for access to the document concerned; and
 - (g) that if the applicant fails to give the agency or Minister such a notice within that period or further period, the request for access to the document will be taken to have been withdrawn.

- (2) If the applicant fails to notify the agency or Minister in a manner mentioned in paragraph (1)(f) within the period or further period mentioned in that paragraph, the applicant is to be taken to have withdrawn the request for access to the document concerned.
- (3) An agency or Minister must not impose a charge in respect of a request for access to a document, or the provision of access to a document, until:
 - (a) the applicant has notified the agency or Minister in a manner mentioned in paragraph (1)(f); or
 - (b) the end of the period or further period mentioned in that paragraph.
- (4) Where the applicant has notified the agency or Minister, in a manner mentioned in subparagraph (1)(f)(ii), that the applicant contends that the charge should be reduced or not imposed, the agency or Minister may decide that the charge is to be reduced or not to be imposed.
- (5) Without limiting the matters the agency or Minister may take into account in determining whether or not to reduce or not to impose the charge, the agency or Minister must take into account:
 - (a) whether the payment of the charge, or part of it, would cause financial hardship to the applicant, or to a person on whose behalf the application was made; and
 - (b) whether the giving of access to the document in question is in the general public interest or in the interest of a substantial section of the public.
- (6) If the applicant has notified the agency or Minister in the manner mentioned in subparagraph (1)(f)(ii), the agency or Minister must take all reasonable steps to enable the applicant to be notified of the decision on the amount of charge payable as soon as practicable but in any case no later than 30 days after the day on which the applicant so notified the agency or Minister.
- (7) If:
 - (a) that period of 30 days has elapsed since the day on which the agency or Minister was so notified; and
 - (b) the applicant has not received notice of a decision on the amount of charge payable;the principal officer of the agency, or the Minister, as the case requires, is, for all purposes of this Act, taken to have made, on the last day of the period, a decision to the effect that the amount of charge payable is the amount equal to the agency's or Minister's preliminary assessment of the amount of the charge mentioned in paragraph (1)(b).
- (8) If:
 - (a) the applicant makes a contention about a charge as mentioned in subsection (4); and
 - (b) the agency or Minister makes a decision to reject the contention, in whole or in part;the agency or Minister, as the case requires, must give the applicant written notice of the decision and of the reasons for the decision.

Note: Section 25D of the Acts Interpretation Act 1901 sets out rules about the contents of a statement of reasons.

(9) A notice under subsection (8) must also state the name and designation of the person making the decision and give the applicant appropriate information about:

(a) his or her rights with respect to review of the decision; and

(b) his or her rights to make a complaint to the Information Commissioner in relation to the decision; and

(c) the procedure for the exercise of those rights;

including (where applicable) particulars of the manner in which an application for internal review (Part VI) and IC review (Part VII) may be made.

(10) Section 13 of the Administrative Decisions (Judicial Review) Act 1977 does not apply to a decision referred to in subsection (8).

(11) A notice under subsection (8) is not required to contain any matter that is of such a nature that its inclusion in a document of an agency would cause that document to be an exempt document.



Charge payable under the FOI Act

PROCESSING CHARGES		
Search and retrieval*Part I, item 3 of the Charges Regulation Schedule		
Task	Time/hr	Cost @ APS/EL rate
Search and retrieval to collate initial June 18 data <i>(APS6 @ \$49.13 p/hr)</i>	0.17	\$8.19
Search of each file/line item to ascertain they are related to same or different client &/legal expense within scope <i>(noting 84 line items need to be investigated for the month of June 18)</i> <i>(EL1 @ \$59.77 p/hr)</i>	2.80	\$167.36
Collate data in format requested <i>(to transpose data in format requested)</i>	2.00	\$119.54
Preparation of schedule of documents <i>(at 3 minutes)</i>	0.05	\$2.99
Search and retrieval subtotal	4.85	\$289.88
Decision making*Part I, item 5 of the Charges Regulation Schedule		
Task	Time	Cost @ \$20/hr
Examination of documents	0.05	\$1.00
Consultation with third parties	0.00	0.00
Preparation of documents for release	0.00	0.00
Preparation of notice of access decision	1.00	\$20.00
Decision making subtotal (before deduction of 5 hours)	- 5 hours	- \$100.00
Decision making subtotal (after deduction of first 5 hours free)	0.00	0.00

ESTIMATED TOTALS AND DEPOSIT	
ESTIMATED TOTAL	\$289.88
PUBLIC INTEREST DISCOUNT (25%)	\$72.47
REVISED TOTAL	\$217.41
REQUIRED DEPOSIT	\$54.35