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# WITHDRAWAL SHEET

## Ronald Reagan Library

**Collection Name** LUMPKINS, SHARYN A.: FILES

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| 1         | REPORT   | NNICC WHITE HOUSE STUDY | 7              | ND       | B6<br>B7(C) B7(E) |

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## Possible Talking Points

### 1. NNICC RETAIL VALUE ESTIMATE

- 1980 estimate of \$79 billion
- Revised methodology & refined data = \$52 billion in 1981
- 1982 Household Survey and Senior Survey
- Moratorium on retail value estimate for 1981, pending task force review and recommendations.
- Publish summary version of NNICC report for Calendar Year 1981.

### 2. DRAFT REPORT TO ATTORNEY GENERAL AND CABINET COUNCIL

- Must also serve as implementation report on Strategy (or do separate report).
- Original issues parallel Federal Strategy objectives and connection should be maintained.
- Some references misleading and create potential for misunderstanding regarding policies and programs involved, e.g.,
  - "full exploitation" of military assistance; exception to Posse Comitatus Act, versus change in Posse Comitatus Act.
  - Domestic Eradication Program: errors in accuracy and terminology; development of economic impact assessments as criteria for prioritization; implied involvement of Agency in domestic cultivation estimates.....
  - Including FDA with agencies having drug enforcement and intelligence responsibilities.
  - Attempting to move epidemiology interests into legal policy.
  - Interdiction portion omits the most controversial issues (follow-up investigations and intelligence).
- Proliferation of coordinating bodies, versus utilizing the coordinating bodies which already exist.



## Letters

### De Lorean's Fall

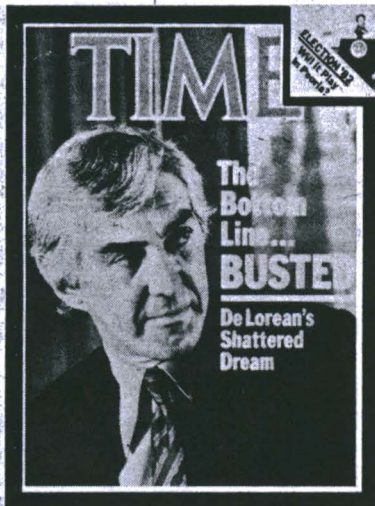
To the Editors:

The John De Lorean story [Nov. 1] has a haunting quality that goes beyond the personal tragedy. He may be typical of the best, and possibly the worst, in the free-enterprise system's hustle for success. Others, including some astute corporations, have been succumbing with alarming frequency to overwhelming pressures and strains that have caused them to spin out of control like De Lorean.

Hans Kleefeld  
Toronto

Many businessmen have gone under after decades of success. I lost my home, career and pension. Unlike De Lorean, most of us started again from scratch without resorting to the drug trade.

Ian Bulloch  
Moraga, Calif.



Certainly no one would condone John De Lorean's actions. Nevertheless, we should be grateful to him. Our society craves such people in order to reaffirm our self-worth and goodness. The higher they are and the harder they fall, the greater our fix.

Carol J. Moola  
Bloomfield Hills, Mich.

John De Lorean probably saw his auto company going down the drain and subconsciously courted disaster. For many highly successful people the only alternative to spectacular success is dramatic failure. De Lorean was too shrewd not to be aware of the dangers a novice faces in the drug trade. Your story noted that he appeared calm and unsurprised when he was arrested. Perhaps De Lorean was also relieved.

John Pritchard  
Somerset, N.J.

Do not worry about John De Lorean. Once he gets over this crisis he will revert to being the entrepreneur. He will begin work on his autobiography, which will be

made into a motion picture, and he will become a highly paid speaker on the lecture circuit. If he goes to jail he will be born again and will make inspiring sermons.

Martin Elkort  
Beverly Hills, Calif.

The De Lorean bust is a typical case of entrapment and sensationalism. The Drug Enforcement Administration claims that he stood to make \$50 million from the sale of 100 kilos of cocaine. I'm a former dealer serving time on drug charges, and I can tell you that a dealer would get a return of between \$10 million and \$15 million. The standard rule in selling drugs is that you can double or triple your money in a very short period of time. The notion that someone can make a 900% profit is an affront to anyone with any business sense.

Earnest Paul Tress #334287  
Sugar Land, Texas

Your Essay "The Man Who Wrecked the Car" asks, "Why have the adventures of John De Lorean attracted so much notice?" The answer is that the media have sensationalized a criminal event beyond all reason. Rich or poor, De Lorean is a suspected dope dealer who hardly merits the attention.

Gerd S. Grombacher  
Sierra Vista, Ariz.

After reading your extensive coverage of John De Lorean, I was reminded of the story of a junior high school student whose assignment was to write an essay on penguins. At the end he wrote, "This is really more than I cared to know about penguins."

Dickie S. Allen  
Pacific Palisades, Calif.

### Freeze Factor

Your story on the nuclear-freeze movement [Oct. 25] says that the issue has been overwhelmed by interest in the 10.1% unemployment rate. But unemployment is the primary concern of many of the nation's pro-freeze organizations. A study commissioned by the International Association of Machinists and Aerospace Workers concludes, "While military spending creates jobs, almost any alternative use of the same money would create many more jobs. If tax dollars are spent on weapons, jobs are forgone in other fields like housing, education, civilian research, energy efficiency and consumer goods." By wanting to convert weapons manufacturing into civilian industries, the nuclear-freeze movement will help stimulate employment and aid economic recovery.

Cindy Lubel  
Miami

The proposal that the U.S. and the Soviet Union should agree to a freeze on nuclear weapons is absurd and unrealistic. Soviet aggression will be contained only if the U.S.S.R. fears the military capability



### Tina has never had a Teddy Bear.

A mother's love. A doll to cuddle. Tina knows nothing of these things. But she does know fear, rejection, and hunger.

For just \$18 a month, you can help save a child like Tina.

Through our sponsorship program you can help provide a child with a better diet, clothes, medical attention, school. And even a toy or two.

But don't wait. There are so many. And somewhere, right now, a child is dying from starvation and neglect.

Write to: Mrs. Jeanne Clarke Wood  
Children, Incorporated, P. O. Box 5381,  
Dept. T11T2, Richmond, Va. 23220 USA

- ☐ I wish to sponsor a boy ☐ girl ☐ in  
☐ Asia, ☐ Latin America, ☐ Middle East,  
☐ Africa, ☐ USA, ☐ Greatest Need.  
☐ I will give \$18 a month (\$216 a year).  
Enclosed is my gift for a full year ☐, the  
first month ☐. Please send me the child's  
name, story, address and picture.  
☐ I can't sponsor, but will help \$ \_\_\_\_\_  
☐ Please send me further information.  
☐ If for a group, please specify.

Church, Class, Club, School, Business, etc.

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1 REPORT

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NNICC WHITE HOUSE STUDY

B7(C)

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THE WHITE HOUSE

WASHINGTON

January 24, 1983

  
Dear Mr. Mullen,

The 1982 Federal Strategy calls for a review to insure that appropriate data systems and intelligence estimates are available to support the needs of drug law enforcement and future Federal Strategies. The annual narcotics estimate prepared by the National Narcotics Intelligence Consumers Committee incorporates the best available information on the production and use of illegal drugs. Because of recent changes in the supporting data systems and recurring questions regarding estimating methodology, the review called for in the Strategy is particularly critical.

I request that you arrange for the NNICC to conduct a comprehensive review of the system used for developing drug intelligence estimates and prepare a written report, with recommendations.

At a minimum, the review should include an assessment of the quality and availability of data, estimating methodology, and the resulting estimates in the following areas:

- Production of illicit drugs worldwide, including within the United States.
- Consumption of illicit drugs within the United States, by type and use patterns, if significant.
- The informal price structure associated with drugs of abuse, the available sources of price information, and the validity of price information.

The NNICC should also review other related estimates, such as the social and economic costs of illicit drugs, the impact of illicit drugs on the "underground economy", and drug-related crime and recommend any additional research which could contribute significantly to management or policy decisions.

You will have my support for tasking other agencies to provide any necessary assistance, including being responsible for working groups to assess subjects in their areas of expertise. In particular, NIDA has access to the consumption data and has already done some work on the social cost considerations. I hope that you will involve all of the Federal agencies in the drug program so that we may gain new perspectives on the drug abuse estimates.



If I can provide any assistance, do not hesitate to call. My staff will be available to participate in the review. I would appreciate receiving the report by May 25, 1983.

Sincerely,



Carlton E. Turner, Ph.D.  
Director  
Drug Abuse Policy Office

Mr. Francis M. Mullen, Jr.  
Acting Administrator  
Drug Enforcement Administration  
1405 I Streeet, N.W.  
Washington, D.C.

cc: OSWG Members



of total retail value of all illicit drugs

potential financial influence of illicit drugs in general

~~The NNICC estimate of total retail sales of illicit drugs is a measure~~

~~indicator of drug trafficking and of the financial power of the traffickers. As such, it can be compared, within limits, with general indicators of activity in the U. S. economy and with other sources of illegal earnings. Because of changing prices and methods of quantifying use, the dollar figure is not a completely valid indicator of the relative social and physical harm of different types of illicit drugs.~~

the methodology for the retail value figure since the first NNICC estimate (for 1977) was published, and it has been under continuous review for

the past two years. In the near future, the White House Office of Drug Policy will establish a commission or panel to assist in this review.

The NNICC believes that this review will decrease the current estimate of \$79 billion in illicit drug sales for 1980. This lower figure will result from a change in methodology and should not be construed as an improvement in the overall drug situation. Pending the results of this review, no figure for 1981 retail sales will be published.

drug sales → effects ←

↑ ↓

not necessarily valid figure

It does not include

The 1981 NIE reflects

annual changes in use pattern and values and further new technology and updated production estimates are now available.



DICK.1

The estimate of the retail value of illicit drugs available for consumption in the United States is a hypothetical indicator of drug trafficking and of the maximum potential financial influence of illicit drugs in our economy. It has long been recognized that the retail value estimate is not representative of the money which changes hands and, therefore, is not comparable with general indicators of activity in the U.S. legitimate economy. For instance, comparisons of the estimate of total retail value with the factual profit and loss statements of U.S. corporations or with licit production of foodstuffs leads to gross exaggerations and is not a valid indicator of the relative social and physical harm of different types of illicit drugs. Only minor revisions have been made in the methodology for the retail value figure since the first annual NNICC estimate was published for 1977. The constant methodology has not reflected changes in user patterns and costs to the user. Further, new detection technology and updated production estimates are now available which suggest that significant changes in estimation methodology are needed. Because credibility is absolutely essential in mounting an effective national campaign against drug abuse, the White House Drug Abuse Policy Office will be establishing a task

force to conduct a comprehensive review of available data and methodology used for estimating consumption and production, as well as social and economic costs of illicit drugs to our society. Pending completion of this review, the 1981 Narcotics Intelligence Estimate reflects the best information available for Calendar Year 1981. No attempt is made to continue the hypothetical retail value estimate pending the recommendations of the task force.



The estimate of the retail value of illicit drugs available for consumption in the United States is a hypothetical indicator of drug trafficking and of the maximum potential financial influence of illicit drugs in our economy. It has long been recognized that the retail value estimate is not representative of the money which changes hands and, therefore, is not comparable with general indicators of activity in the U.S. legitimate economy. For instance, comparisons of the estimate of total retail value with the factual profit and loss statements of U.S. corporations or with licit production of foodstuffs leads to gross exaggerations and is not a valid indicator of the relative social and physical harm of different types of illicit drugs. Only minor revisions have been made in the methodology for the retail value figure since the first annual NNICC estimate was published for 1977. The constant methodology has not reflected changes in user patterns and costs to the user. Further, new detection technology and updated production estimates are now available which suggest that significant changes in estimation methodology are needed. Because credibility is absolutely essential in mounting an effective national campaign against drug abuse, the White House Drug Abuse Policy Office will be establishing a task

4. The estimated retail value, if credible, is representative of the money which changes hands. If  $x$  buyers purchase a drug @  $\$y$  per unit, then the total amount of money which changes hands is  $\$xy$  per unit. It is not representative of what happens to this money after it changes hands, but that is a different matter.

→ IT IS NOT AN INDICATOR OF  
SOCIAL, PHYSICAL OR even  
economic harm -

see Strat. p - 9

→ now that these are  
available

I THINK WE COULD BE  
more generous here -

1. Credibility is absolutely essential  
in mounting effective national  
campaign etc.
2. NNICC tried to make  
consumption estimate  
more credible in

~~to~~ the retail value  
still is bad  
both inaccurate  
and misleading



→ 2. It cannot be compared to factual profit and loss statements but it can be compared with annual retail sales which is a general indicator of activity.

→ 3. It leads to gross exaggerations because (a) the estimate itself has <sup>probably</sup> been exaggerated, (b) there is no estimate of profit and loss, etc. to maintain the perspective. For example, the validity of the information is somewhat violated if we say "Xerox had gross retail sales of \$79 bill in 1980 an increase from \$65 bill in 1979," but fail to note that Xerox costs ~~for 1981~~ were \$80 bill in 1980 and only \$60 in 1979.



force to conduct a comprehensive review of available data and methodology used for estimating consumption and production, as well as social and economic costs of illicit drugs to our society. Pending completion of this review, the 1981 Narcotics Intelligence Estimate reflects the best information available for Calendar Year 1981. No attempt is made to continue the hypothetical retail value estimate pending the recommendations of the task force.



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| 2. For Reference Consult<br><i>Sharon Yumppkins</i>                                                                                                                                        |                |                                                                           |                                                                                                                                         | 3. Agency<br><i>OPD</i>                                                                                                                                                                                                                      |                  | 4. Telephone No. (extension)<br><i>X 7090</i>                                                                                                                 |               |
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| 7. Title:<br><i>Executive Summary</i>                                                                                                                                                      |                |                                                                           |                                                                                                                                         |                                                                                                                                                                                                                                              |                  |                                                                                                                                                               |               |
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| e. Viewgraphs                                                                                                                                                                              |                | f. Certificates                                                           |                                                                                                                                         | g. Diagrams                                                                                                                                                                                                                                  |                  | h. Stationery                                                                                                                                                 |               |
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# An Evaluation of the Methodologies for Producing Narcotics Intelligence Estimates

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← Prepared by the  
National Narcotics Intelligence Consumers Committee  
← at the request of the  
← White House Drug Abuse Policy Office  
← August 1983



*Actual  
Cover*

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# An Evaluation of the Methodologies for Producing Narcotics Intelligence Estimates



## EXECUTIVE SUMMARY

*to describe*

Annual Narcotics Intelligence Estimates (NIEs) are prepared by the National Narcotics Intelligence Consumer Committee (NNICC) and incorporate the best available information on the production and use of illegal drugs. The estimates are widely used ~~in describing~~ the nature and extent of our drug abuse problems and to provide information to Federal decision makers.

Recent changes in supporting data systems and recurring questions regarding estimation methodology have caused concern over the validity and usefulness of these estimates. The 1982 Federal Strategy for Prevention of Drug Abuse and Drug Trafficking calls for a review "to ensure that appropriate data systems and intelligence estimates are available to support the needs of drug law enforcement and future Federal Strategies."

At the request of the White House Drug Abuse Policy Office, a study was undertaken by the 11-agency NNICC. The central focus of the study is the adequacy and appropriateness of the data and methodologies utilized in deriving the quantitative estimates for production of illicit drugs worldwide and consumption, price, purity and retail value of illicit drugs consumed in the United States. The study also reviews related estimates concerning the impact of illicit drugs on the underground economy and the social and economic costs of drug abuse.

Overall, the study identified a number of deficiencies in the existing estimation process which, if corrected, will make the estimates more valid and timely. However, it must be recognized that the covert and illicit nature of the activities being estimated will continue to limit the precision that can be achieved in the estimation process.

The key findings and recommendations of the study are:

- *Many of the data systems and other indicators utilized in deriving NNICC estimates were developed for other applications and are not ideally suited for intelligence estimation purposes. Some limited data losses are due to erosion in budgetary resources to maintain data bases.*

Recommendations: Existing data systems should take NNICC requirements into consideration and make the necessary refinements if at all possible. In selected areas, agencies should fund research to develop refined estimation capability within their respective areas of responsibility, with funds specifically identified and budgeted for this purpose. The prioritization of research areas should be established through close coordination of NNICC members.

- *Information in the NIEs is generally 18 to 30 months out of date and consistency is not always maintained in the presentation of supporting statistics from one report to another.*

Recommendations: Shorten and simplify the NIEs and substantially reduce the time to issue these reports by focusing on estimates and supporting statistics for which the NNICC is specifically responsible.



- *The NNICC estimation process has not realized its full potential because of a shortage of personnel possessing expertise in certain technical skills, notably economics, statistics and data analysis. These special skills are necessary to refine the estimation process and develop complex estimates.*

Recommendation: Establish a nucleus of highly qualified analytic personnel with the necessary technical expertise to support the NNICC process. This is especially important at the Drug Enforcement Administration which has a central responsibility in the development of estimates.

- *The lack of adequate data on the potency, composition and price structure of illicit drugs is a major problem. The number of data samples taken is generally insufficient and the samples taken do not fully represent overall retail conditions.*

Recommendation: Data bases should be refined and expanded to utilize available state and local information.

- *Estimates of field production are too imprecise and too many steps removed to provide a proper basis for developing estimates of drugs consumed within the United States. Technical improvements in estimating acreage are not likely to overcome this problem. Nevertheless, field production estimates are of value in working with host countries in developing eradication and assistance programs.*

Recommendation: Consumption estimates should not be based upon estimates of field production except where data concerning prevalence, frequency and dosage of use are not available.

- *Estimates of the total retail value of illicit drugs are imprecise and flawed conceptually. These estimates have high visibility, are used as the primary basis for assessing the impact of drug trafficking on the underground economy, and should be more representative of illicit drug transactions.*

Recommendations: Discontinue the retail value estimate and replace that estimate with a more appropriate measure of final sales, pending necessary improvements in estimation methodology.

- *The development and dissemination of overall economic and social cost estimates related to illicit drugs is not an intelligence matter, despite the fact that the intelligence community draws upon some of the same methodologies and data as the research community which develops such estimates.*

Recommendation: The NNICC should maintain an awareness of research which is being pursued in this area, but economic and social cost estimates should not be included as an established responsibility of the NNICC. Individual members of the NNICC, however, may develop aspects of these estimates in pursuit of their agency responsibility.

Detailed conclusions and recommendations begin on page 79 of this report.



# **AN EVALUATION OF THE METHODOLOGIES FOR PRODUCING NARCOTICS INTELLIGENCE ESTIMATES**

**Prepared by the  
National Narcotics Intelligence Consumers Committee**

**at the request of the  
White House Drug Abuse Policy Office**

**August 1983**

## COMMENTS ON NNICC METHODOLOGY REVIEW

### II. THE ANNUAL NNICC REPORT

Pages 3-7: Please add the following as appropriate:

- (a) The Annual Report for 1978 (Office of Drug Abuse Policy) provided the first documentation of methodology for estimating the amounts of heroin and cocaine imported into and consumed in the United States (see Attachment A). This should be discussed in this chapter and mentioned as appropriate throughout the methodology review.
- (b) A discussion/quote of the Caveat which has always appeared at the front of the NIE should be included. The Caveat for the 1981 NIE, in particular, is appropriate to this report.

Page 4, paragraph 4, line 2: "sharing of perceptions..." =  
"sharing of information..."

Page 4, paragraph 4, line 4: Omit "DEA" and replace with "U.S. officials..."

Page 6, paragraph 4, line 6: "process has dragged on..." =  
"process has continued..."

Page 6, paragraph 6, line 5: "...not compressible,..." =  
"unavoidable..."

### III. PRODUCTION ESTIMATES

Pages 8-14: Suggest that sections in Chapter III (Production Estimates) be reformatted as follows:

PURPOSE AND SCOPE OF ANALYTICAL EFFORT  
OPIUM AND HEROIN PRODUCTION ESTIMATES  
    Methodology  
    Adequacy of Methodology  
COCA AND COCAINE PRODUCTION ESTIMATES  
    Methodology  
    Adequacy of Methodology  
MARIJUANA PRODUCTION ESTIMATES  
    Methodology  
    Adequacy of Methodology  
HASHISH PRODUCTION ESTIMATES  
    Methodology  
    Adequacy of Methodology

Page 9, paragraph 2, lines 6-8: Reword "This information is, however, not important to know because these two countries are not thought to be significant in the illicit opium traffic." to read "However, these two countries are not believed to be significant in the illicit opium traffic."

Page 9, paragraphs 3-4: Suggest following rewording. (In reference to deleted lines 8-10 (para. 3), it should be noted that, although heroin is the opiate form which poses the most severe threat to the United States, it still takes opium to make heroin and effective, long-range control of heroin is more likely possible at the "opium" source.)

Following an estimation of illicit crop yield, determinations must be made as to how much of the illicit opium produced is consumed within the source country, how much is exported, how much is converted to heroin, how much is consumed in secondary countries other than the United States, and how much from a particular source country or area is consumed in the United States. This is as important to U.S. international control initiatives as the illicit crop yield estimate because it provides the Department of State with information concerning the impact of illicit production, both within a specific source country and in the international illicit market. Again, serious obstacles exist in developing such estimates.

Addict populations, and the resulting consumption estimates, can be only crudely estimated in Southeast Asia, Pakistan, Iran, Afghanistan, India and the Near East. A determination must be made as to whether the opium or heroin is consumed by smoking or by eating. A change of one gram in the assumed daily intake of the Iranian opium eater makes a difference of about 200 metric tons in the annual consumption requirement. Similar difficulties arise in estimating heroin consumption in Western Europe, although not to the same degree. Larger quantities are consumed by heroin smokers than by those who inject heroin.

As a general rule, ten kilograms of refined opium are required to make one kilogram of heroin. It has been suggested that, if the number of heroin laboratories and their production capacities could be accurately estimated, an estimate of world production of heroin could be determined even if our knowledge of the illicit opium supply remained murky. The locating and dismantling of heroin laboratories justify high priorities for intelligence collection and enforcement. There have been significant concentrations of heroin laboratories along the Thai-Burmese border, and in Pakistan, Sicily, France, Mexico and elsewhere; however, these concentrations most often occur in inaccessible or protected areas and individual laboratories demonstrate a significant variety in production capabilities. The typical heroin laboratory in Burma, for example, is a fairly simple



operation set up at a well-guarded campsite. It can be buried or moved on short notice. The difficulties involved in identifying a single laboratory operation create considerable uncertainties in the potential for calculating total production by laboratory count.

Furthermore, only a small fraction of the total amount of heroin produced worldwide enters the U.S. market. Enhanced data on the volume of heroin laboratory production would have to be supplemented by accurate data concerning worldwide heroin consumption before an accurate estimate of the illicit supply of heroin to the United States could be determined.

These problems are mitigated to the extent possible by comparison of production-based estimates of heroin available to the U.S. market with estimates of heroin consumed in the United States, and by source determination of heroin removed from the illicit market.

Page 10, paragraph 3, first sentence: The statement that "The bulk of cocaine production...is destined for the U.S. market" is misleading even though it is basically correct. It may be worthwhile to note the increasing market in Europe, i.e., "The bulk of cocaine production, unlike that of opium and heroin, continues to be destined for the U.S. market, although the availability of cocaine in Western Europe has been increasing in recent years."

Page 11, paragraph 2, lines 9-14: This rather incredible result may prompt questions, but primarily it demonstrates that an analysis of imports of critical processing chemicals cannot provide a means for determining laboratory production at the present time. Suggest the following rewording:

...supply by NNICC estimates. This rather incredible result prompts more questions than it answers. For example, could some of the tainted distributors have been selling ether to legitimate users part of the time? Could we have overestimated the efficiency of cocaine conversion? Could cocaine laboratory operators have been stockpiling ether in 1981? These questions and others would have to be answered before the imports of critical processing chemicals will provide a valid indicator of cocaine laboratory production.

Page 11-12, Marijuana: Although this report is primarily based on conditions and methodology affecting the NIE's for 1981 and earlier, it may be worthwhile to mention the significant technological advance which was made in determining the acreage devoted to cannabis in the primary source country during 1982, and the fact that 1982 was the first year that data was systematically collected for domestic production. These two advances, which are having a dramatic impact on production estimates for 1982, represent a substantial improvement in the accuracy of marijuana production estimates.



Page 11, paragraph 3, line 1 and line 5: "marijuana" = "cannabis..."

Page 11, paragraph 4, line 5: "marijuana" = "cannabis..."

Page 11, paragraph 4, lines 9-10: "are commonly" = "may be..."  
Insert sentence (line 10, following "...greenhouse operations."):  
"A related problem is that an estimated 1 million people in the United States are growing cannabis indoors, primarily for personal use."

Page 12, paragraph 1: Delete last two sentences (in parentheses) and add discussion of domestic marijuana production estimates. The following material was developed by the Domestic Marijuana Working Group and may be useful.

The pattern of cultivation in the United States does not allow for data collection and surveying comparable to that which is done in foreign source countries. The contrasts between domestic and foreign marijuana production remain dramatic. Domestic cannabis cultivation is most accurately measured by plant count and not by acreage. Domestic cultivation occurs in "plots" or with individual plants scattered among other vegetation, versus cultivated fields in foreign source countries. Domestic marijuana is largely produced for personal use or distributed within the local area, versus foreign marijuana in multi-ton shipments and involving international and national trafficking and distribution organizations.

Intelligence estimates of the amount of marijuana produced in the United States have been hampered by the predominantly small-scale and highly-diversified nature of domestic cannabis cultivation. The preliminary data base for domestic production has been complicated by confusion in some areas between cultivated cannabis and naturalized cannabis weeds (hemp variety), or between sinsemilla and regular marijuana. A lack of reporting standards resulted in an estimated average yield of marijuana per cannabis plant which varied by as much as 1 pound in different reports. Adding to the confusion was the reporting of wet plant weight (including roots) as estimated marijuana yield, or the practice of roughly estimating the number of plants based on acreage, a practice which has resulted in estimated plant counts which vary by thousands of plants for the same plot.

In recognition of the above, the data base for estimated domestic marijuana production was enhanced in 1982 as part of the 1982 Domestic Marijuana Eradication/Suppression Program, and substantial collection refinements are underway in 1983. In addition, a domestic marijuana working group of intelligence, enforcement and research experts has established reporting standards, such as average yield per



plant, so that consistent and accurate information can be available to and reported by all officials involved in the 1983 data collection and eradication effort.

Page 12, paragraph 4, last sentence: Department of State requirements for data and estimates go beyond that "to be used by U.S. executive directors to international financial institutions" and, in effect, provide ammunition to every element of U.S. international drug control initiatives.

Page 13, paragraph 2: This does not explain why "Mexico's opium production is a significant estimate relating to the U.S. import estimate," especially with heroin from Southwest and Southeast Asia supplying an estimated 64 percent of the U.S. market in 1981. Nor does it explain how the Mexican opium estimate could "become the primary method for determining U.S. heroin consumption" under any circumstances. What it does seem to say is that (a) estimated opium production in Mexico is more directly aligned with the amount of Mexican heroin imported into the United States than production/importation estimates for the other major source areas, and (b) ...the Mexican opium estimate will not become the primary method for determining U.S. consumption "of Mexican heroin."

An additional paragraph would be appropriate to explain the use of consumption data and the Signature program to supplement inadequate production information in order that the Department of State and drug law enforcement have the "best possible" strategic intelligence concerning international drug production and trafficking trends.

Page 13, paragraph 3, line 9: "Cocaine conversion laboratory" = "Cocaine processing laboratory" (versus heroin conversion)?

Page 13, paragraph 4, third sentence: Suggest deleting: "It remains to be seen whether this closer approximation will continue to obtain in the face of burgeoning estimates of domestic production." This statement is confusing and, if it means what it seems to mean, it is possibly not well founded. The "burgeoning estimates of domestic production" are, to a large degree, a direct result of "greater refinement in estimating marketable production in the field."

Page 14, paragraph 2, lines 9-10: Reword "the NNICC must continue to rely on them imto; a satisfactory alternative becomes available." to read "they are the best believed to be available until a satisfactory alternative appears."



#### IV. CONSUMPTION ESTIMATES

Page 16, paragraph 2: This paragraph needs clarification and probably some elaboration. There seems to be a logic or linguistic problem. First, it would seem that purity data, in addition to prevalence data, is directly linked to development of consumption estimates. Secondly, it is difficult to determine the meaning or the purpose of the second sentence, i.e.: (a) "As a result" of what? Perhaps, "most data are only directly linked to the development of consumption estimates" because "most data sources are less than ideal"? (b) What is the meaning of "less than ideal?"

Page 17, last paragraph: Reword as follows:

While some of these views may be extreme, they nevertheless underscore the difficulty of developing good intelligence estimation methodologies to support the needs of the diplomatic, drug law enforcement and health communities and the interests of those concerned with drug abuse policy.

Page 18, paragraph 2, line 4: "was made by DEA..." = "was developed by DEA..."

Page 20, paragraph 5, last line: "...or the users." = "...or of the user."

Page 20, paragraph 7 - Page 21, paragraphs 1-2: Section on Computational Procedures should be reworded as follows:

Estimates of cocaine consumption are calculated by multiplying number of users by frequency of use and average amount consumed per session. The 1981 estimate employed updated results from the 1979 National Survey on Drug Abuse (the most recent survey available) which indicated that 15 percent of all cocaine users take the drug five or more days per month, 30 percent of users take the drug one to four days per month, and 55 percent of users take cocaine less than once per month. In making the estimates, the NNICC has assumed that the number of administrations in an average abuse session is three, and that the average purity of cocaine used is 30 percent.

The computational procedures used for the 1981 estimate represented a departure from methods used in previous estimates. Two subgroups were created within the population which used cocaine five or more days per month, differentiating between heavy use characterized by injection and smoking versus those characterized by inhalation. Based upon NIDA data, the subgroup characterized by injection and smoking was estimated to consist of 6.9 percent of the total user population. For this subgroup, the number of administrations per session were calculated at four, and the average purity of cocaine used was calculated at 45 percent.



Although the 1981 estimate was based on an estimated 2.5 million additional cocaine users than in 1980, the resulting cocaine consumption estimate for 1981 was 34.4 metric tons, compared to the supply based estimate for 1980 of 31.5 metric tons. The 1980 NNICC estimate of 31.5 metric tons assumed that 30 percent of annual users used cocaine five or more days per month, that the number of administrations in an average abuse session is three, and that the average purity of cocaine used is 30 percent. In an independent calculation for 1980, the Internal Revenue Service (IRS) stated that average cocaine purity was 12.7 percent, that there were two instead of three administrations per abuse session, and that 14 percent of the annual users were heavy users. The difference in results was significant: 31.5 metric tons for the NNICC estimate versus 7.8 metric tons for the IRS estimate.

Page 22, paragraph 1, last line: "...may be the highest." = "...may be significantly higher than the general population."

Page 23, paragraph 4, line 4: "...marijuana trade." = "...marijuana market."

Page 23, paragraph 5 - Page 24, paragraph 1: Move last two sentences of the paragraph, i.e., "Dangerous drugs consist of a variety...and stimulants." to first of paragraph. Follow with "The first dangerous drug...in defining drug class."

Page 24, paragraph 4, line 2: Correct "fundings" to "findings."

Page 25, paragraph 3, lines 1-2: Correct "(e.g., methamphetamine, and all hallucinogens) are derived..." to "(e.g., methamphetamine) and all hallucinogens are derived..."

Page 25, paragraph 3: Is the National Household Survey used in formulating the estimate for hallucinogens, since hallucinogens are one of the drug categories included?

Page 25, paragraph 4: The National Household Survey provides estimates for 11 drug categories; it provides estimates for only four categories of psychotherapeutic drugs. In addition, it provides estimates for hallucinogens. Therefore, the National Household Survey provides estimates for five dangerous drug categories.

## V. RETAIL PRICE AND PURITY ESTIMATES

Page 27, paragraph 1, line 1: "...illicit drugs..." = "...illicit drugs..."

Page 27, paragraphs 2-3: Drug price and purity should be given equal attention. The Overview discusses the second use of statistics on drug "prices" and provides a summary of how "price" statistics are developed. What about the second use of statistics on drug "purity," i.e., development of consumption estimates, and a summary of how "purity" statistics are developed?

Page 28, paragraph 2, last sentence: "...based upon both retail-level purchases and retail-level seizures." ???

Page 29, paragraph 2: This is confusing. Suggest rewording.

Another...major ports of entry. Many other areas of the United States have a trade in illicit heroin; because of DEA's emphasis on the upper-level trafficker, prices in these areas are not proportionately represented in its removals data base. To remedy possible biases, DEA is now utilizing the Uniform Crime Reports arrest data to apportion the weight given to exhibits obtained in each geographic area of the country.

Page 29, paragraph 6, line 5 - Page 30, paragraph 1, line 1: Suggest rewording to: "This lends more relative importance to the exhibits having a higher cut weight (i.e., lower purity)."

Page 30, paragraph 1, last sentence: Does "pocket" = "packet"? What is the purpose of this sentence? It seems to be identical to taking the average of the exhibit purities which is discussed above. Unless there is a purpose which can be clarified, suggest deleting last sentence and adding an explanation to the sentence which precedes it, e.g., "This situation favors the weighted average as more representative of the actual market."

Page 31, paragraph 1, line 2: "...Uniform Crime Report Data for narcotics arrests to weight..."

Page 33, paragraph 2, line 5: Extra space between "DEA/" and "NIDA".

Page 33, paragraph 4, line 1: Does "the highest retail sales" refer to the highest purity retail sales or the highest priced retail sales?

Page 33, paragraph 5, line 5: Replace "improving retail qualities" with "increasing retail qualities" (improving from standpoint of consumer) or "decreasing retail qualities" (improving from standpoint of NYCPD), depending on which is appropriate.



Page 33, paragraph 6, line 2: Insert comma following "...and/or PCP trade"

Page 34, paragraph 2, line 1: "...the average retail price..." = "...the average retail purity..."

Page 34, paragraph 5, line 1: To prevent confusion here and on page 36, suggest clear identification of Dangerous Drug Pilot Project, i.e., "The recently implemented Dangerous Drug Pilot Project, a NIDA-sponsored Community Correspondents Group program, provides..."

Page 36, paragraph 1, lines 1-2: Confusion. If this means "the retail prices of most illicit dangerous drugs", then the "notable exceptions" listed include "most illicit dangerous drugs," or at least the more important illicit dangerous drugs. An alternate meaning could be "Although the retail prices of most illicit drugs tend to be relatively stable, illicit dangerous drugs are a notable exception, as may be seen from the prices for 1981-1982 which are listed below."

## VI. RETAIL VALUE ESTIMATES

Page 38: The chapter on Retail Value Estimates is an excellent discussion of the methodology involved in developing the retail value estimate and a very credible summary of the complexities of the overall NNICC estimating process. It does not address the policy issues concerning the retail value estimate and, in fact, this was not specifically required in the official tasking. Nevertheless, it is recommended that the chapter on Retail Value Estimates include, at the beginning, a section on "Basic Issues" because of the high visibility and controversial nature of this particular estimate. The following wording is suggested.

### SOME BASIC ISSUES

A measure of the economic effects of drug abuse and drug trafficking is important to our understanding of the magnitude of the drug problem and of the relationship of drug abuse to the underground economy. The NNICC has published an estimated retail value of illicit drugs supplied to the U.S. market for each of the years from 1977 to 1980. An estimated retail value estimate was developed for 1981, but was not published.

Of the annual estimates developed by the NNICC, none has received as much public visibility nor become as controversial as the annual retail value estimate. Since the first estimate was published for 1977, this hypothetical gross retail value figure has been widely utilized by government officials, the media and other elements to illustrate the extent of the illicit drug problem. In addition, the estimated average street sales value, available via the retail value estimate, is the predominant value used in the media to describe the importance of a drug seizure. The alternative, determining the number of users who would have been supplied had the shipment been distributed at the retail level, is less convenient and seems to have less public impact.

Given this high visibility, there has been concern that a retail value estimate is too easily misinterpreted, that it is not representative of the total economic cost of drug abuse, and that it has a high degree of uncertainty.

- o A retail value estimate tends to over emphasize the profits to be made by trafficking in illicit drugs. The retail value estimate, which does not reflect total net revenues, expenses, assets and liabilities, exaggerates the economic importance of the illicit drug traffic, especially when the retail value estimate is mistakenly compared to "profits" of legitimate corporations.
- o A retail value estimate in no way reflects the economic or social cost to the United States of drug abuse and



drug trafficking, i.e., the marginal costs of health care, security, the criminal justice system, lost productivity and tax revenues; the substantial cost to the individual of violent or property crime associated with illicit drugs; and the unquantifiable cost of pain, suffering and family disruption which often accompanies drug abuse.

- o Ongoing improvements in data bases and methodology during the past two years has made it increasingly apparent that retail value estimates published for 1978 through 1980 were too high. The estimate for 1980 was \$79 billion. The 1981 estimate of \$52 billion reflected revised methodology rather than improvements in the drug abuse situation and it was expected that substantial revisions would again occur in the 1982 estimate.

Based on the above concerns, a decision was made, prior to the publication of the NIE for 1981, to discontinue the retail value estimate pending completion of a comprehensive review of available data and methodology for estimating consumption, production, price structure and the social and economic costs of illicit drugs to our society. The following chapter provides a thorough discussion of methodology and data used for developing the retail value estimate. Subsequent chapters on the underground economy and the social and economic cost of drug abuse explore the feasibility of developing more definitive economic cost estimates for drug abuse and drug trafficking.

Pages 38-47: Additional comments will be provided to expand this chapter.

Page 38, paragraph 2, line 5: "...the illegal drug business..." = "...the illegal drug traffic..."

Page 41, paragraphs 2-3: The material concerning the methodology used for the 1981 cocaine estimate is largely incorrect. The actual methodology used is well documented in both the draft NIE (pp. 43-46 and B-1 through B-7) and, minus the retail value estimate, in the final NIE (pp. 43-46 and 102-107). Recommend the following rewording:

The retail value estimate for cocaine in the revised NIE draft report for 1981 was derived using a combination of the results from a consumption methodology and a production methodology. The cocaine retail value estimate is shown as a range extending from \$16.3 billion to \$21.4 billion.<sup>11</sup> The details provided on the derivation of these figures show that two different average prices have been used. They are \$0.40 per milligram at 100 percent purity for heavy users who, as mentioned eariler, are believed to be well connected to the distribution system, and \$0.60 per pure milligram for others who must rely on routine street buys.<sup>12</sup>



Based on a consumption methodology, the minimum amount required for consumption was computed at 34.4 metric tons. Based on a production methodology, the maximum amount available for import was computed at 30-60 metric tons. Total cocaine consumption was thereby estimated at 34.4 to 45.0 metric tons, with 34.4 metric tons representing the minimum amount required based on consumption figures and 45.0 metric tons representing the mid-point of the range for maximum amount available based on the production methodology.

The retail value estimate for the minimum amount required (consumption methodology) totaled \$16.3 billion and was computed by multiplying the amount consumed by the estimated average price for each user category and adding the results. The retail value estimate for the maximum amount available (production methodology) totaled \$21.4 billion and was computed by extrapolating the percentage of total amount consumed for each user category to the production-based estimate, deriving the theoretical maximum amount available to each user category, and proceeding as above. Again, the two resulting totals were used to form a range.

The 1981 estimate differs from earlier ones insofar as a two-tiered price system was introduced to recognize that heavy users were able to buy their cocaine at lower prices. However, the procedure for 1981 represents a more important departure from earlier practice insofar as, for years prior to 1981, the quantity factor entering the retail value calculation was based on a production/importation approach rather than the combined consumption/importation approach which was used for the 1981 estimate. Earlier reports made reference to trends in consumption, and the 1980 estimate provided an alternative estimate of cocaine tonnage based on U.S. consumption,<sup>13</sup> but there was no indication that these were directly included in the retail value calculations.

Page 42, paragraphs 1-3: There appear to be problems with the marijuana discussion (para. 1) when compared to the 1981 NIE (draft and final versions) and with information submitted to the Drug Abuse Policy Office in conjunction with development of the 1981 estimate. This information, which was incorporated into a chart (Attachment B), indicated that the marijuana retail value estimate was based on the estimated supply to the U.S. market and the average retail price for each type of marijuana by source country. This was also indirectly referred to in a paper prepared on the subject of estimating methodology for the 1981 marijuana estimate (see Attachment C), but the specific retail prices used for each category were not provided.

Although the estimated 9,600-13,900 metric tons was labeled as a "consumption" estimate (para. 1, lines 4-9) in figure 1 of the draft NIE (page 2), this was corrected to "estimated supply" in the final NIE (page 1). Estimates included in the marijuana



section of both the draft NIE (page 54) and the final NIE (page 52) are clearly identified as estimated "supply." As explained in Attachment A, "no separate estimate of consumption was attempted..."

Based on all available information, the bulk of the market (para. 2, lines 5-6) continues to be made up of regular marijuana. Sinsemilla is estimated to make up only about 33 percent of domestic marijuana production, or about 3 percent of the total estimated marijuana supply in 1981. In 1982, although about 42 percent of cannabis plants eradicated were listed as sinsemilla, intelligence continues to indicate that about only 33 percent of domestic marijuana production is sinsemilla, or roughly 7 percent of the total U.S. supply. Jamaican production, of which an undetermined amount is sinsemilla, makes up about 9 percent (1981) to roughly 16 percent (1982) of U.S. supply. At maximum, the amount of sinsemilla available to the U.S. market would be around 20 percent of the total supply.

The "competitive advantage of sinsemilla" (para. 2, lines 8-10) is a controversial subject. Many experts believe that the market for sinsemilla is primarily limited to "connoisseurs" or sophisticated, long-term daily users. According to research, the "high" produced by high-potency sinsemilla is so intense that it is unpleasant to the average marijuana user. The continued high price of sinsemilla coupled with the fact that the 1982 National Household Survey indicates a decrease of 1.4 million daily marijuana users between 1979 and 1982 would seem to indicate that this market will not increase substantially in the foreseeable future.

Research conducted by the University of Mississippi further indicates that, contrary to popular belief, the production of sinsemilla does not always result in a higher potency product. In fact, sinsemilla potency ranges from 0.1 to a rare 11 percent and, therefore, some sinsemilla has a lower potency than regular marijuana. It is further believed that not all marijuana sold as sinsemilla is, in fact, sinsemilla. Many users who believe they are buying sinsemilla may be buying regular marijuana or "buds" at sinsemilla prices.

According to the 1981 NIE, "Sinsemilla...requires such controlled conditions and is so labor-intensive that production of this type is limited." (page 51) This assessment was "ratified" by the Domestic Marijuana Working Group members in April 1983. Were the demand for sinsemilla to increase so as to represent the bulk of the market, it is doubtful that U.S. production could meet the increased demand, especially with the eradication program in full swing. Under these conditions, as noted in the 1980 NIE, "some shift to Jamaica as a source seems likely. Jamaican cultivators enjoy an enormous cost advantage over domestic growers in producing this labor-intensive crop (page 56). At any rate, domestic marijuana production cannot be directly equated with the production of sinsemilla (para. 2, lines 12-14).



More to the point, the problems and misinterpretations which result from a lack of documentation are clearly demonstrated by this attempt to address the 1981 marijuana estimate. It is not possible to reconstruct the estimate even after a thorough review of the draft NIE and a special paper prepared on the subject. The estimating staff could probably reconstruct the estimate. In addition, a discussion of the high potential for confusion inherent in the presentation of this particular estimate is appropriate to the purpose of this paper.

Page 43, paragraph 2, line 6: "(i.e., ..." = "(e.g.,..."

Page 43, paragraph 2, line 15: Delete "had" between "methodology used for 1981" and "yielded..."

Page 43, paragraph 4, lines 6: This is a good assessment of that particular decision.

#### VIII. SOCIAL AND ECONOMIC COSTS

Pages 51-52: Three options are available:

- (1) Give up the idea of developing an estimate of the social and economic costs of drug abuse to society. Obviously, based upon the conclusions reached in this paper, the benefits of developing the empirical base for statistically valid studies are not cost effective. Nevertheless, the public perception of the drug abuse problem is important to citizen involvement and support in solving the problem, and estimates of this nature seem to be meaningful to the public.
- (2) Explore the possibilities for the development of an "intelligence" estimate of the minimum economic cost of drug abuse to society. If this were feasible, it would provide an extra dimension to our perception of the drug abuse problem and help to balance the controversial retail value estimate. An intelligence estimate, based upon the RTI study and updated and/or supplemented with other available data, could have greater validity than some of the other key intelligence estimates which are developed.
- (3) Publish available estimates on various elements related to the economic cost of drug abuse. This would require minimal work or cost and would add an important dimension to the NIE.

Neither Option 2 nor Option 3 are outside the responsibility of the NNICC. Both are being explored in more depth and an expanded chapter on social and economic costs is being developed.



## IX. CONCLUSIONS AND RECOMMENDATIONS

Page 53, paragraph 1, line 3: "drug enforcement policy" = "drug abuse policy..."

Page 53, paragraph 1, line 5: "...to managing the drug enforcement effort." = "...to developing national drug abuse policy and to managing the international cooperation, drug law enforcement and drug abuse health efforts."

Page 57, Recommendation 1: Anyone who relies heavily on the NIE will strongly support this recommendation. What seems to be needed is a short report which presents all estimates (including primary trend estimates such as prevalence, consequence, price, purity, etc.) in an orderly and efficient format, possibly through the use of charts and, when necessary, concise bullets. Two of the major difficulties in using present and previous NIE's are inconsistency in the types of estimates provided and difficulty in accessing key estimates and trend data for overall drug, geographic or activity trends. For example, some of the information for a specific drug is often included in the Executive Summary but not in the drug section. Not all estimates or data elements presented for one drug are presented for another drug, even when appropriate, and the type of estimates provided for a particular drug vary from year to year. (These problems do not apply to those major estimates which are presented in chart form on an annual basis.)

The revised format would result in accessibility, consistency and flexibility. In addition, the NIE would have greater credibility if all primary trend estimates were available (an important point to be considered in conjunction with Recommendation 4).

Development of the revised format might also take into consideration the specific needs of the various types of consumers, i.e., national policy, international cooperation, drug law enforcement, interdiction, treatment, prevention and research.

Page 59, Recommendation 11b, last line: "underterminated" = "undetermined."

## APPENDICES

Appendices C through T: There are some inconsistencies in header format.

Appendix C, third page: Duplicate last pages. (Appears to be two originals.)

Appendix D, Political Sensitivity: Delete "The data collection does not involve a conflict between Congress and the Executive Branch because" and begin sentence with "The ANSR..." or clarify first part of sentence so that it has meaning to the uninformed reader. Reword "The country may be unwilling to accept assistance because it does not share our perception of the country's role" to read "The country may be unwilling to accept our perception of the country's role in the drug traffic..."

Appendix E, Definitions/Assumptions, last sentence: Enforcement personnel estimate the yield of marijuana on the basis of the estimated average weight of drug yield per cannabis plant, assuming maturity.

Appendix E, Contractual Arrangements: Extra space between "on" and "a state-by-state..."

Appendix F, Primary Usage of the Indicator, line 2: "bility" = "ability..."

Appendix F, Collection Methodology, paragraph 1: The statement "Approximately 800 heroin exhibits are sampled randomly each year" (lines 7-8) implies that approximately 800 exhibits in addition to an unidentified number of exhibits from ports of entry are sampled each year, since all port of entry seizures are analyzed and non-port-of-entry seizures are sampled "randomly." Should the word "randomly" be deleted from this statement?

Appendix G, Collection Methodology, paragraph 2, lines 4-5: "legitima- tely" = "legiti- mately..."

Appendix H, Organization Providing Indicator Data: Break in header underlining.

Appendix I, Collection Methodology, line 3: "where data is" = "where data are..."

Appendix I, Collection Points, line 2: Extra space between "nearest" and "to..."

Appendix K, General History of the Indicator: It should be clarified that a decrease in availability may indicate either an increase in demand or a decrease in supply and vice versa. Also, the statement "that the index's use as an analog is limited since it represents 100 percent pure heroin or cocaine" is somewhat confusing. Limited in what way(s)?



Appendix K, Relative Importance of the Indicator to NNICC:  
Should purity be included, i.e., "A reasonably accurate price/purity analog...is a necessity..."??? The actual consumption is essentially a product of estimated consumption per episode multiplied by number of episodes and purity per unit of heroin. On the other hand, the estimated retail value is essentially a product of estimated total consumption, multiplied by price per unit of heroin. "The gross weight consumption figure for heroin" does not represent "1979 Household Survey data..." but the Heroin Problem Index (cf. page 18, para. 3-5).

Appendix L, General History of the Indicator: See comments for Appendix K, General History of the Indicator.

Appendix L, Collection Methodology, paragraph 1: The last line, i.e., "\$5.00 per milligram for pure heroin," should be corrected to cocaine.

Appendix M, Collection Methodology: Do DEA's 19 divisions represent 25 district offices or are resident offices included in this figure? If so, change "district" to "field..."

Appendix N, Special Collection or Computational Problems, last line: More to the point of intelligence, these data have a definite enforcement policy bias.

Appendix O, Definitions/Assumptions, paragraph 4, line 3: "in the area where the changing patterns are observed" = "in the area where the data is collected"???

Appendix P, Other Indicators Used in Conjunction...: First sentence has no subject.

Appendix P, Validity: Accuracy/Completeness, paragraph 2, line 7: "judgement" = "judgment"

Appendix P, Special Collection or Computational Problems, paragraph 1, line 4: Extra space between "assistance" and "activities..."

Appendix P, Special Collection or Computational Problems, paragraph 2, last line: Need two lines on a page.

Appendix Q, Other Indicators Used in Conjunction, line 3: Omit comma between "population" and "and..."

Appendix Q, Definitions/Assumptions, paragraph 2, bullet 3: "Even used" = "Ever used..."

Appendix Q, Validity: Accuracy/Completeness, paragraph 1: The age groups in paragraph 1 are from CODAP or DAWN, not the National Survey. Age groups for the National Survey are youth (12-17), young adults (18-25), and older adults (26 and older).

Appendix Q, Validity: Accuracy/Completeness, paragraph 3, line 5:  
"rish" = "risk"

Appendix Q, following Timeliness: Appendix Q is missing sections for Validation Procedures, Availability/Accessibility, Special Collection or Computational Problems, Cost and Manpower Requirements, Contractual Agreement, Political Sensitivity, and Prospects for Continued Funding.

Appendix R, Primary Usage of the Indicator, paragraph 2, last line: It may be appropriate to note that the high school seniors surveyed are at an important transitional age of their lives (from youth to young adults), an age which is particularly important for determining drug abuse trends.

Appendix R, Relative Importance of the Indicator: (a) paragraph 1, line 1 - "provide" = "provides", (b) paragraph 2, line 2 - insert "other" between "from" and "existing..."

Appendix R, Definitions/Assumptions, paragraph 1, line 5: Insert "and from" between "heroin" and "amphetamines..."

Appendix R, Collection Source Agent, line 5: "represenatives" = "reprsentatives..."

Appendix R, Validity: Accuracy/Completeness: (a) paragraph 1, line 5 - "one percent refuses..." ??? and (b) paragraph 2 - "five to ten percent" = "5 to 10 percent." (for percentages only)

Appendix R, special Collection or Computational Problems, No. 2:  
"%" = "percent"

Appendix U: Interesting and well-formated chart. "Import" should be deleted from title. Under Heroin Use Prevalence, 1978, insert "emergency" between "for" and "room mentions..."