



May 8, 2014

Mr. Timothy Horan
Contracting Officer
General Services Administration
1800 F Street NW
Washington, DC 20405-0001

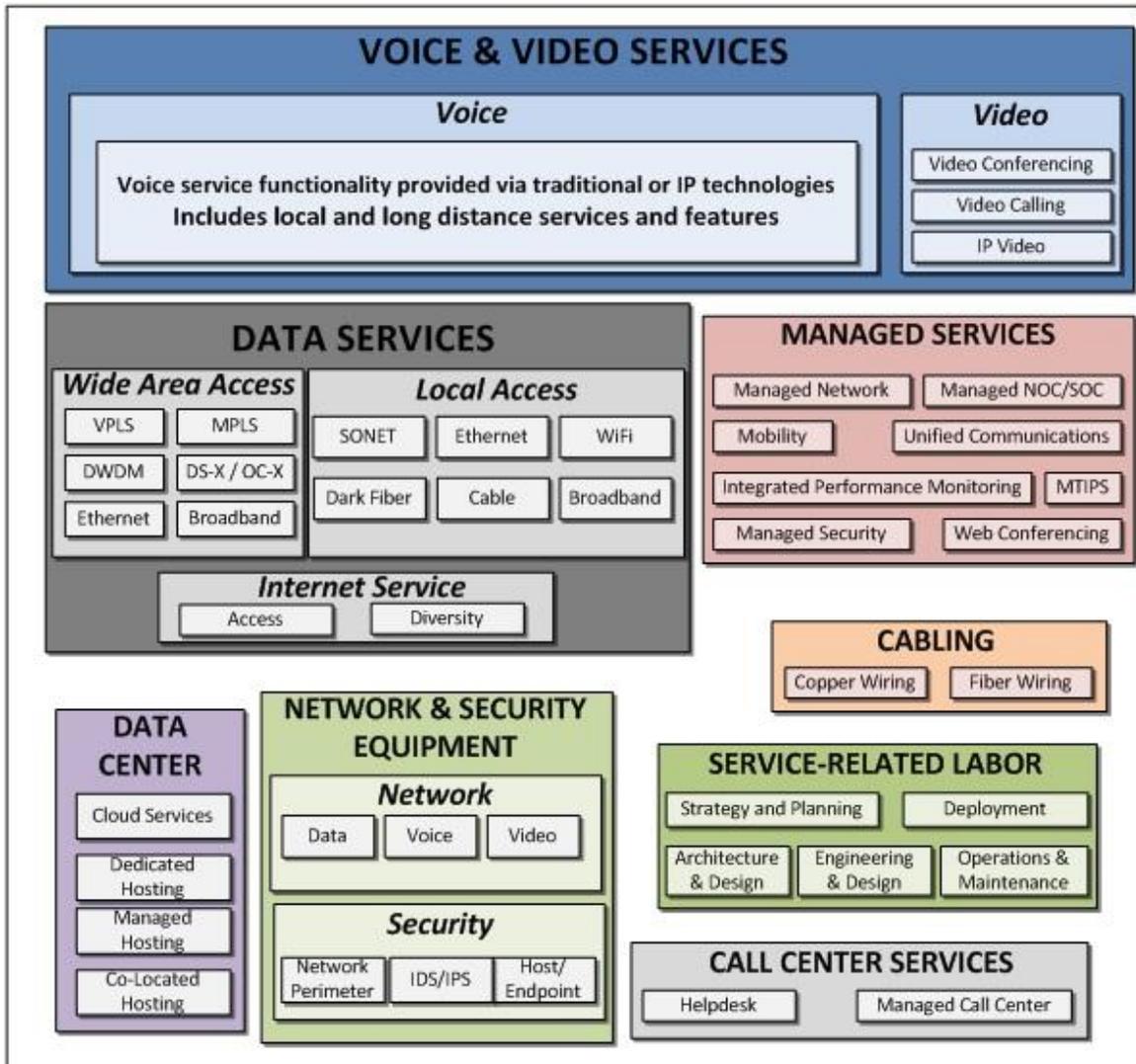
RE: Enterprise Infrastructure Solutions (EIS), Request for Information
#QTA00NS14THI3001

Mr. Horan:

The Coalition for Government Procurement (The Coalition) is pleased to respond to Enterprise Infrastructure Solutions' (EIS) Request for Information. The RFI seeks input/feedback on the Network Services 2020 (NS2020) Strategy to meet future Federal information technology and telecommunications needs.

The Coalition is a non-profit association of firms selling commercial services and products to the Federal Government. Our members collectively account for approximately 70% of the sales generated through the GSA Multiple Award Schedules (MAS) program and about half of the commercial item solutions purchased annually by the Federal Government. Coalition members include small, medium and large business concerns. The Coalition is proud to have worked with Government officials over the past 30 years towards the mutual goal of common sense acquisition.

The contract structure envisioned by the NS2020 acquisition strategy will have major implications for competition in the federal market. Moreover, the NS2020 strategy creates significant questions regarding duplication among GSA's government-wide contract portfolio. The concerns regarding the NS2020 proposed acquisition strategy center on the scope of services contemplated by the RFI and designation of mandatory services and optional services. The following chart from the RFI (Page 5, Figure 2: EIS Services) sets forth the categories and scope of proposed NS2020 services:



The RFI states that “[f]or services, the minimum mandatory requirement will be for voice and data services as identified in Figure 2.” See page 6 of the RFI. The RFI provides that in order to be eligible for award under NS2020 an offeror must propose compliant video and data services as identified in Figure 2. The remaining products/services identified in Figure 2 are optional: (1) Data Center; (2) Network & Security Equipment; (3) Cabling; (4) Managed Services; (5) Service-Related Labor; and Call Center Services. As optional items under NS2020, an offeror may or may not include them in their proposal. However, in order to be eligible to provide optional products/services, an offeror must propose the minimum mandatory voice and data services.

The minimum/mandatory structure, combined with the optional products/services will unduly restrict competition. The practical impact will be to restrict the ability of cloud service providers, call center providers and a host of equipment suppliers from competing directly for requirements under NS2020. In essence, the acquisition strategy bundles requirements in a manner that will limit

competition to a small subset of the information technology and telecommunications market. For example, there are a host of cloud service providers working through GSA's FedRAMP program that are able to compete for and provide cloud services across the federal government. Will NS2020 shut these firms out of the market? How will the bundling impact small business? In order to maximize competition for NS2020, we recommend that GSA establish a separate EIS solicitation for voice and data, rather than making it a mandatory minimum requirement.

Moreover, NS2020's proposed scope and structure duplicate major portions of pre-existing GSA government wide contract vehicles, including Alliant and the GSA Schedules. NS2020's approach is also inconsistent with the contract structure used in the OASIS procurement which maximized competition across the services marketplace. The OASIS structure left it to the offerors to decide which "pools" or functional areas to propose – there was no minimum mandatory set of services.

NS2020 is the fourth generation procurement for telecommunications services managed by GSA: (1) FTS 2000; (2) FTS2001; (3) Networx; and now (4) NS2020. In each generation it appears that the transition costs and timing has become more and more challenging. Perhaps it is time to consider a GSA Schedules telecommunications solution. The GSA Schedules provide flexibility to offer a suite of services while not limiting competition across the market. Continuous open seasons would ensure access to the commercial telecommunication market on an ongoing basis meaning greater access to new services, products and technologies. The 20 year contract period would provide greater stability and ease concerns regarding the timing for task order competitions and transitions. Most importantly, GSA, as the statutory manager of the GSA Schedules program, has the discretion to structure a telecommunications Schedule that maximizes competition from the commercial market.

The Coalition thanks you for allowing us to submit comments in response to this RFI and we look forward to a positive dialogue with ITS on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Waldron", with a long horizontal flourish extending to the right.

Roger Waldron
President