



October 9, 2012

General Services Administration
Regulatory Secretariat
(MVCB), Attn: Hada Flowers
1275 First Street NE, 7th Floor
Washington, DC 20417

Subject: FAR Case 2009–24, Prioritizing Sources of Supplies and Services for Use by the Government

The Coalition for Government Procurement (Coalition) appreciates the opportunity to submit comments on the correction to the proposed rule regarding prioritizing sources of supplies and services in FAR part 8. The proposed rule was published on September 6, 2012.

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 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.

Controlling Contract Duplication

The Coalition supports the proposed rule to the extent that it addresses contract duplication. Our concern with contract duplication is the recent government-wide growth in the number of contracts that offer the same or similar services and products, resulting in increased bid, proposal and contract management costs for government, industry, and ultimately the American taxpayer. Encouraging Federal agencies to utilize existing sources as much as possible takes advantage of investments that both the government and the private sector have already made to bring commercial services and supplies to the Federal market.

FAR 8.004 (a)(1) Supplies and (2) Services, as proposed, promotes the use of existing sources including the Federal Supply Schedules, Government-wide acquisition contracts, multi-

agency contracts, and blanket purchase agreements (BPAs). To further address contract duplication, the Coalition recommends that the FAR require agencies to:

- consider the use of existing sources rather than merely encourage agencies to do so
- document the contract file to reflect why an existing source does not meet their needs for requirements that exceed the simplified acquisition threshold.

Federal Supply Schedules & Small Business

Small businesses play a vital role in the U.S. economy as an engine for economic and job growth. The Federal Supply Schedule (FSS) program, in particular, has provided small businesses with significant opportunities with Federal agencies. By taking advantage of the commercial marketplace, the FSS program has consistently surpassed the government-wide small business contracting goal of 23 percent with over one third of total dollars going to small business concerns on an annual basis. To the extent that the proposed rule maximizes utilization of the FSS program and other governmentwide acquisition programs, it also promotes continued opportunities and lower cost of participation for small business in the Federal market.

Thank you for considering our comments regarding the prioritization of sources of supplies and services in FAR part 8. Please let me know if you have any questions.

Sincerely,

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

Roger Waldron
President