



May 24, 2013

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Re: JanSan and MRO Draft RFQs

Dear Glenda and JoAnn:

Thank you for the opportunity to provide comments on the draft solicitations for the Janitorial/Sanitation Commodities (JanSan) and Maintenance, Repair, and Operations Supplies (MRO) currently under development by the General Services Administration (GSA).

The Coalition for Government Procurement ("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 that offer JanSan and MRO products in the government market. The Coalition is proud to have worked with government officials over the past 30 years towards the mutual goal of common sense acquisition.

### **Strategic Sourcing Model**

The Coalition supports the use of strategic sourcing at the agency level to reduce federal spending on JanSan and MRO products rather than the use of generic government-wide contracts. Agency-level BPAs are a streamlined, flexible acquisition tool that can effectively leverage specific requirements to provide best value as authorized by Federal Acquisition

is important for vendors to know what an agency's plans are for their own BPA in addition to anticipated spend under the JanSan and MRO FSSI BPAs. Finally, the Coalition requests that agency commitments be provided when the RFQ is released versus "prior to the RFQ closing" as proposed in the draft RFQs.

### **Data Reporting**

A primary objective of the JanSan and MRO RFQs is to obtain significant reporting and transactional data to enable agencies to better manage spending. The data reporting required as part of the FSSI BPAs is significant. Usage reports are required quarterly. Management reports and Performance Metrics reports are to be submitted every month.

Data is not a free good. In response to any data reporting requirements that go beyond standard commercial practice, contractors must invest in systems to track, collect and report the information requested by the government. In cases where the government already has the data, the costs that are incurred and passed on to the government in the form of higher prices are unnecessary. In order to control these costs, the Coalition recommends that GSA conduct an open dialogue with industry about the type of data that is already collected commercially and the costs involved in additional data requirements. This is an important Myth-buster's dialogue for GSA to have in order to better assess the economic tradeoffs between acquiring certain information and achieving lower prices. It is also an opportunity for the government to explain to vendors how the data is being used. Too often, the government collects data at a cost to both the public and private sectors—and vendors are left with the impression that the data is not used to the benefit of American taxpayers.

Further, we ask that GSA remove the requirement that vendors agree in advance to provide agency-specific reports at no additional cost. Vendors should not be asked to make such a commitment without knowing the specific requirements at the task order level.

### **Small Business**

The Coalition is concerned about the unintended consequences of the JanSan and MRO FSSI BPA on small businesses that currently participate in the FSS program. As expressed in the Pre-solicitation Industry meeting on May 15, 2013, there are many small businesses that are concerned about losing the opportunity to compete for a significant portion of government business if they are not one of the few awarded under the JanSan and MRO FSSI BPAs. GSA

6. Keep Schedule SINS open to new offers to allow Federal customers continued access to new technologies and provide opportunity for businesses of all sizes in the government market.
7. Allow vendors to provide their best effort toward a non-Market Basket discount or multiple discounts based on the product categories represented in the pool.

Again, the Coalition appreciates the opportunity to provide industry feedback on the JanSan and MRO draft solicitations. We also thank GSA for the additional time that vendors have had to review the drafts and provide more detailed comments. If there are any questions, please contact me at (202) 331-0975 or [rwaldron@thecgp.org](mailto:rwaldron@thecgp.org).

Sincerely,

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

Roger Waldron

President



June 12, 2013

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 Development  
 General Services Administration  
 2200 Crystal Drive  
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Re: JanSan and MRO Draft RFQs

Dear Glenda and JoAnn:

Thank you for the opportunity to provide additional comments on the draft solicitations for the Janitorial/Sanitation Commodities (JanSan) and Maintenance, Repair, and Operations Supplies (MRO) currently under development by the General Services Administration (GSA).

The Coalition for Government Procurement (“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 that offer JanSan and MRO products in the government market.

The following is a list of questions from the Coalition membership. Some of these questions are from our previous submission on May 24, 2013. However, they do not appear to have been included in the Draft RFQ Questions and Responses posted on GSA Interact June 7.

	Subject	Question/Comment
1	Agency Commitments	Will GSA provide detailed agency commitment letters when the JanSan and MRO RFQs are released that address agency’s anticipated spend and any plans concerning existing agency-level BPAs that contain products covered by the JanSan and MRO FSSI BPA?

11	<b>Non-Market Basket Discounts</b>	<p>Non-Market Basket product discounts should not be calculated directly off of the aggregate Market Basket discount. That adds complexity to the pricing process increasing the opportunity for incorrectly calculated prices. In addition, it may not lead to the lowest price overall as businesses may need to adjust the market basket prices to ensure they are not discounting the non-Market Basket items beyond what would be reasonable. Also, placing a discount on the entire pool of products may be overly burdensome for vendors whose products from the pool may fall into multiple product categories that require different pricing methods. The vendor should be allowed to provide their best effort toward a non-Market Basket discount or multiple discounts based on the product categories represented in the pool.</p>
12	<b>Market Basket Core Items</b>	<ol style="list-style-type: none"> <li>1. Some products have the identical description in the draft RFQ. How can the bidder distinguish exactly what product GSA is requiring? This is particularly evident in the paper products</li> <li>2. Regarding toilet paper, the number of rolls per case specified is provided by only one company. To increase sourcing opportunities, can the bidders quote the same product, but with a different number of rolls per case? How will GSA ensure there is equity in the products and pricing quoted for these products?</li> </ol>
13	<b>Market Basket Nonstandard Items</b>	<p>Will GSA consider removing items that are not common JanSan type products like toilet repair kits, vacuum breaker kits for toilets, lamp recycling kits, replacement cartridges for water free urinals, spill containment berm or cartridge filter for wet/dry vacuum? These items do not logically fit into pools 1, 2 or 3.</p>
14	<b>5.2 Requirements related to Regulatory Compliance</b>	<p><i>“The following ancillary services that are compulsory as part of this requirement include...Offer payment options including...Activity Address Code (AAC) or DOD Activity Address Code.”</i></p> <p>How can a commercial vendor support this payment option?</p>
15	<b>5.2.2 Addition of Products</b>	<p><i>“In the event a commercial item become AbilityOne item through addition to the JWOD procurement list, the BPA holder is required to automatically substitute AbilityOne items when Essentially-The-Same (ETS) items are ordered.”</i></p> <ol style="list-style-type: none"> <li>1. Are we required to replace the ETS product with the A1 product creating a variance to the PO? Or, is our responsibility to notify the customer of the A1 product? If the customer insists on the ETS product, must we cancel the order?</li> <li>2. Is the BPA holder required to create a separate order for the AbilityOne item?</li> </ol>

Again, the Coalition appreciates the opportunity to provide industry feedback on the JanSan and MRO draft solicitations. If there are any questions, please contact me at (202) 331-0975 or [rwaldron@thecgp.org](mailto:rwaldron@thecgp.org).

Sincerely,

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

Roger Waldron  
President



July 2, 2013

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Re: JanSan and MRO Draft RFQs

Dear Glenda and JoAnn:

Thank you for the continued opportunity to comment on the Janitorial/Sanitation Commodities (JanSan) and Maintenance, Repair, and Operations Supplies (MRO) draft RFQs. The Coalition would like to submit the following additional comments concerning the market baskets.

<u>NUMBER</u>	<u>DESCRIPTION</u>	<u>QUESTION/COMMENT</u>
PF01	Label maker	Is this in the appropriate category?
PF09	Paint shaker	This product is not a stock item and is produced to order with a 3-4 week lead time. Do you have alternates?
MF01	Vacuum, ball type	This is only made by one source for retail trade and questionable as a commercial use product.
MF39	Vacuum, ball type	This is only made by one source for retail trade and questionable as a commercial use product.
CC26	Detergent, dish	Is the size specified correct?
CC55	Hydration tablets	This is a retail product available from only one source.

If there are any questions, please contact me at (202) 331-0975 or [rwaldron@thecgp.org](mailto:rwaldron@thecgp.org).

Sincerely,

Roger Waldron  
President



July 15, 2013

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Re: JanSan and MRO Draft RFQs

Dear Glenda and JoAnn:

The Coalition for Government Procurement sincerely appreciates the update posted on GSA Interact on July 12, 2013 concerning the upcoming Janitorial and Sanitation products (JanSan) and Maintenance, Repair, and Operations (MRO) supplies solicitations. As described in our previous comments, the Coalition supports robust competition and opportunities for businesses of all sizes under the governmentwide Federal Strategic Sourcing Initiative (FSSI). Increasing the number of awardees within the JanSan and MRO Market Basket Categories is a positive step towards driving increased competition at the task order level.

As a next step, the Coalition requests that GSA issue a second draft of the JanSan and MRO RFQs. There are many questions that industry has raised that have yet to be answered. The publication of a second draft RFQ would communicate to the vendor community how GSA plans to move forward on these issues, help to eliminate obstacles in the contracting process and will ultimately result in a better FSSI vehicle for customer agencies.

Thank you for considering our request. If there are any questions, please contact me at (202) 331-0975 or [rwaldron@thecgp.org](mailto:rwaldron@thecgp.org).

Sincerely,

Roger Waldron  
President