



August 14, 2017

Dana N. Weaver
Supervisory Contract Specialist
U.S. General Services Administration
819 Taylor Street
Room: 11A30
Fort Worth, Texas 76102

Subject: Request for Information for Strategic Sourcing, Janitorial and Sanitation (“JanSan”) Supplies Purchase Channel Next Generation

Dear Ms. Weaver,

Thank you for the opportunity to provide comments in response to the General Services Administration (“GSA”) Request for Information (“RFI”) regarding their proposed plans for the next generation JanSan purchasing channel.

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 a significant percentage of the sales generated through GSA contracts including the Multiple Award Schedule (“MAS”) program. Coalition members are also responsible for many 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 for more than 35 years towards the mutual goal of common sense acquisition.

Pursuant to the RFI, GSA is considering creating at least one, and possibly more than one, enhanced Special Item Number (“SIN”), to serve as the next generation Federal Strategic Sourcing Initiative (“FSSI”) purchasing channel for JanSan solutions on Schedule 73. In addition to maintaining many of the current generation’s Best-in-Class (“BIC”) and FSSI features, the new enhanced SIN(s) could include many additional features, including but not limited to, targeted set-asides, zonal pricing, and ancillary services.

Our understanding is that GSA is seeking specific industry input in response to the RFI that can be used to design an Enhanced SIN that offers certain BIC features and “lowest possible pricing” for JanSan solutions. Based on the current RFI, however, Coalition members have more questions about the

proposal rather than specific suggestions. For this reason, we request that GSA provide additional details about the Enhanced SIN (or SINs) through a second RFI and/or Industry Day so that industry can better understand the proposal and provide more substantive feedback.

Until additional details are provided, we recommend that any next generation solution for the JanSan Purchasing Channel promote competition and access to innovation by allowing all interested vendors to participate on the Enhanced SIN(s), including all current JanSan FSSI vendors. In addition, we recommend that any solution include all applicable Federal regulations related to the AbilityOne Program so that compliance with AbilityOne is maintained during the transition from the FSSI contract to the Schedules program. Further, we recommend that it not include additional administrative fees (i.e. CAF) for customer agencies above the existing Industrial Funding Fee (“IFF”) of 0.75%.

According to the RFI, “[c]ontractors may be disallowed from holding an existing 51V SIN alongside its enhanced SIN(s), simultaneously. (ie, holding both current SIN for cleaning products and a new enhanced SIN)[.]” By disallowing contractors from holding an existing 51V SIN alongside the new enhanced SIN(s), the proposal could reduce competition and access to innovation on the Schedule. Currently, two-thirds of the current JanSan purchasing channel’s vendors, representing approximately 80% of sales through the vehicle, do not hold a Schedule 73 contract. Consequently, by prohibiting vendors from concurrently holding an existing 51V SIN alongside a new enhanced SIN, current vendors are being excluded from the ability to compete for new orders under the next generation solution.

In addition, the proposed SIN structure is duplicative and unnecessarily complicated for customer agencies and contractors. As outlined in the RFI:

- There could be multiple GSA vehicles for customer agencies to procure JanSan solutions through once the new Enhanced SIN(s) is created:
 - Enhanced SIN(s) 375 XXX
 - 51V SINs
 - Existing Schedule 73 SINs
 - The current JanSan FSSI purchasing solution
- Current contractors holding Schedule 51V and Schedule 73 SINs will need to decide whether they should instead offer their products under the Enhanced SIN 375 XXX, and prior to the end of the current JanSan solution, 51V contractors will have to decide which Schedule 73 to offer their products under in the future.
- It is unknown which solution will be prioritized by customer agencies when purchasing JanSan solutions.

Given GSA’s emphasis on offering lower pricing for customer agencies, GSA should eliminate the proposal’s 2% Contract Access Fee (“CAF”) and apply the standard IFF of 0.75%. This would maintain consistency with the entire Schedules program. Otherwise, contractors’ electronic systems may need to be updated to monitor not only Schedule sales, but Schedule sales by SIN, to ensure that the

appropriate fees are being submitted to GSA on a quarterly basis. It would be more cost efficient for contractors and customer agencies to maintain the standard IFF.

Again, the Coalition requests that GSA share what they learned from feedback submitted in response to the RFI and what their plans are regarding the proposal moving forward. Specifically, the Coalition requests that GSA provide additional details about the Enhanced SIN (or SINs) through a second RFI and/or Industry Day so that industry can better understand the proposal and provide more substantive feedback.

Thank you for the opportunity to provide public comments in response to the proposed rule. If there are any questions, please contact me at (202) 331-0975 or 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