



Ms. Kimberly Bass
Defense Acquisition Regulations System
Office of the Undersecretary of Defense for Acquisition and Sustainment
Defense Pricing and Contracting, Room 3B941
3060 Defense Pentagon
Washington, DC 20301-3060

Subject: "Expediting Contract Closeout" Proposed Rule (DFARS CASE 2017-D042)

Dear Ms. Bass,

The Coalition for Government Procurement ("the Coalition") sincerely appreciates the opportunity to submit comments in response to the Expediting Contract Closeout proposed rule.

The Coalition is a non-profit association of firms selling commercial services, products, and solutions to the Federal Government. Our members collectively account for tens of billions of dollars of the sales generated through the GSA Multiple Award Schedules (MAS) program. Coalition members include small, medium, and large businesses that account for more than \$145 billion in Federal Government contracts. The Coalition is proud to have worked with Government officials for over 40 years towards the mutual goal of common-sense acquisition.

The Department of Defense (DoD) is proposing to amend the DFARS to expedite contract closeout by waiving entitlement by the Government and the contractor to any residual dollar amounts below \$1,000 under certain contracts.

The Coalition supports the Department's efforts to expedite contract closeout and reduce the administrative costs of processing any residual amounts due to either the Government or the contractor below \$1,000.

We appreciate DoD's intent to streamline the contract closeout process and the proposed rule's application to contracts for commercial items under the simplified acquisition threshold (SAT). In addition to contracts under Part 12, we recommend that DoD explicitly apply the expedited contract closeout capability to all contracts regardless of contract type or commerciality to include:

- Federal Supply Schedule contracts awarded under Part 8
- Competitive and non-competitive contract awards over the SAT under Part 15, and
- Contracts and orders issued under Part 16

Our members report regularly investing significant time and effort to reconcile *de minimis* dollar amounts at contract closeout for all types of contracts, not only commercial item contracts under Part 12. We ask that the DPC consider expanding the application of the proposed *Expediting Contract Closeout* clause to

contracts under Parts 8, 15, and 16 so that taxpayer dollars are better utilized for contract activities that directly support the Department's mission.

Thank you again for the opportunity to submit comments in response to the Expediting Contract Closeout proposed rule. If you have any questions, I may be reached at (202) 315-1053 or rwaldron@thecgp.org.

Best regards,

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

Roger Waldron
President