



April 20, 2016

Diemle T. Phan
Contract Specialist
General Services Administration
1800 F St NW
Washington, DC 20405-0001

Subject: GSA Cybersecurity Services Request for Information (RFI)

Dear Ms. Phan,

Thank you for the opportunity to provide comments in response to the Request for Information (RFI) on Cybersecurity Services. The Coalition for Government Procurement (“the Coalition”) sincerely appreciates the opportunity to provide input to GSA in response to the RFI.

On behalf of our Information Technology and Professional Services member organizations, the Coalition would like to provide comments in response to two of your RFI questions on “ensuring government access to cybersecurity resources and services as quickly as possible” and “the need for a new government-wide contracting vehicle or offering to purchase cybersecurity services.” Rather than establish a new contract vehicle, the Coalition strongly recommends that GSA utilize its existing contracts and reform its current programs to deliver cybersecurity services to customer agencies.

[The need for a new government-wide cybersecurity services contracting vehicle](#)

The Coalition recommends that GSA utilize existing contract vehicles and offerings for the cybersecurity services listed in Section B of the RFI instead of establishing an additional government-wide contracting vehicle. The scope of cybersecurity services outlined in the RFI can be purchased in a more cost-effective manner under pre-existing vehicles such as GSA’s IT Schedule 70, Alliant and Alliant Small Business. Continued contract duplication increases the complexity and costs of the acquisition process for both government and industry. These costs are ultimately passed on to the customer in the form of higher prices. Overlapping, redundant contracts also have to be managed by both the public and private sectors causing inefficiencies

within and across Federal agencies and in companies for the life of these contracts. Establishing an additional government-wide contract vehicle for cybersecurity services would simply increase contract duplication at a time when the Administration and GSA have sought to reduce it through the Category Management initiative under the OFPP Administrator Anne Rung's *Transforming the Marketplace* memorandum released in December 2014.

Ensuring the Government has timely access to cybersecurity resources through GSA

GSA can ensure timely access to the latest cybersecurity resources and services by reforming its outdated pricing policies. Currently, compliance risk associated with the Price Reductions Clause (PRC) limits access to innovation and best value solutions through the Multiple Award Schedules (MAS) program. In order to ensure that the government has access to the latest cutting edge cybersecurity technologies, GSA's pricing policies must be more in alignment with the commercial marketplace. Due to pricing variability and associated risk under the PRC as well as burdensome processes having new products and services added to GSA Schedules, unnecessary barriers exist for commercial firms seeking to offer their latest technologies and solutions to GSA's customer agencies (e.g., cybersecurity tools and solutions).

The Coalition recommends that GSA take the following steps to ensure that agencies have access to leading edge cybersecurity technologies: (1) update the GSAR pricing policies and procedures to reflect the 21st century commercial marketplace; (2) revise or eliminate burdensome contracting procedures and restrictive MAS solicitation terms and conditions that restrict a company's ability to efficiently and effectively add new technologies to GSA contracts. Transforming the FSS program through updated pricing policies and ordering procedures, streamlined contract structures, and reduced government unique requirements will drive access to commercial innovation, solutions and competition for cybersecurity services.

Thank you for the opportunity to provide public comments in response to GSA's Cybersecurity Services RFI. If you would like to discuss any of these topics further or have 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 horizontal line extending to the right.

Roger Waldron
President