



January 5, 2015

Carolyn Alston
The Coalition for Government Procurement
1990 M Street, N.W.
Suite 450
Washington, DC 20036

Dear Ms. Alston:

This letter is a response to your August inquiry regarding the applicability of MIL-STD-129. In August, you requested FAS consider language from MIL-STD-129, which prompted the creation of a cross-organizational team to analyze the Federal Marking, Labeling, and Packaging standards and the associated Federal Supply Schedule clauses to ensure consistent understanding and applicability of MIL-STD-129. Internal discussions with all FAS Acquisition Centers and leadership, as well as external conversations with DLA took place.

The cross-organizational team has determined that going forward compliance with MIL-STD-129 and FED-STD-123 will be strictly enforced. The decision to comply will be across the board and apply to every order without exception. We understand the request to accept commercial labels and/or practices; however, given the results of our analysis, commercial labels simply do not contain the level of detail in content or automation (bar codes) to facilitate package deliveries without delays. In cases where packages cannot be delivered, we refer to these items as frustrated freight; and, once frustrated, these items impact our customer missions due to the lack of timely receipt of items. Also, frustrated freight results in additional expense to GSA to research and eventually rectify improper marking and packaging issues.

The cross-organizational team has identified the following points regarding the applicability for MIL-STD-129 and FED-STD-123, in accordance with GSAM Clause 552.211-73, Marking.

1. For Department of Defense (DoD), including DLA and all DoD Components, standards are established by DoDM 4140.01, Volume 9 and are implemented in accordance with FAR DLAD 5452.211-9010 which is consistent with GSAM Clause 552.211-73 and also requires compliance with MIL-STD-129 and FED-STD-123.
2. Contractors shall mark and label shipments to the DoD regardless of CONUS, OCONUS, or via a Consolidation Containerization Point (CCP) in accordance with MIL-STD-129.

3. FED-STD-123 is applicable to **all** non-DoD, CONUS and OCONUS, shipments and all OCONUS orders NOT forwarded through DoD transportation and consolidation points.
4. Previously, the Hardware Center, Schedule 51 had an exception that allowed MIL-STD-129 to be applied at the task order (TO) rather than at the contract level. This practice is no longer acceptable because improperly labeled and packaged items result in significant delays and costs and is inconsistent with our customer's regulations. Therefore, the exemption has been rescinded.
5. In no case may customers opt out of compliance at the task order level.
6. MIL-STD-129 requires both linear bar codes and two-dimensional symbols on shipping labels (aka MSL) and Linear Bar Codes on DD250s or purchase orders.
7. For DoD, including DLA and all DoD Components, Commercial labels are not acceptable. All labels must be Military Shipping Labels compliant with MIL-STD-129.
8. Purchase Orders and Commercial packing lists must include all data elements as required by MIL-STD-129.

To increase vendor awareness, the Vendor Support Center (VSC) Marking/ Labeling/ Packaging tab is being reformatted and updated so vendors can easily understand what is required to produce compliant labels and packing documents. The new VSC will include Vendor "aides", sample documents, PowerPoint presentations, regulatory references, and Frequently Asked Questions.

The implementation of the new VSC web page and consistent enforcement is anticipated in approximately 4-6 weeks.

If you have any additional questions or concerns, please contact Steve Hutchinson at steve.hutchinson@gsa.gov or Robert Bourne at Robert.bourne@gsa.gov.

Sincerely,



Donna M. Jenkins
Assistant Commissioner
Office of Acquisition Management