



December 10, 2012

Houston Taylor
Assistant Commissioner
Office of Acquisition Management
General Services Administration
2200 Crystal Drive
Arlington, VA 22202

Re: Transparency for MAS Contractors via eBuy

Dear Houston,

I am writing on behalf of members of The Coalition for Government Procurement regarding the transparency of eBuy to GSA Multiple Award Schedule (MAS) contractors.

The Coalition for Government Procurement 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 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. The Coalition is proud to have worked with Government officials over the past 30 years towards the mutual goal of common sense acquisition.

The Coalition is pleased that the Office of Acquisition Management has increased its involvement in the development of e-systems to ensure that their design is consistent with acquisition policy. We believe that the new framework will greatly improve the effectiveness of these tools. Given Acquisition Management's role regarding GSA e-tools, we would like to bring to your attention concerns regarding the transparency of eBuy.

Currently, it is our understanding that access to information on eBuy about specific procurement opportunities is less than transparent with visibility of Requests for Quotes (RFQs) limited within and across SINs. This limitation on contractor visibility of requirements is a

recurring issue that has come to our attention again with changes to eBuy that restrict the view of set-aside orders to small business concerns. Given the convergence of technologies and the fact that many of today's services span multiple disciplines, we are concerned that not all MAS contractors that have the ability to meet specific requirements are receiving adequate notice. The MAS program is ultimately designed to streamline the procurement process. Limiting the ability of MAS contractors to view RFQs, for even benign reasons, can have a negative impact on the efficiency and effectiveness of the MAS program overall. It can ultimately restrict competition by limiting the ability of companies to team and creates inefficiencies in bid response times when MAS contractors receive notice second-hand. The result is increased costs for contractors and customer agencies.

In addition to the sound business reasons cited above, there is also a regulatory basis for making information on eBuy more widely available to MAS contractors. Providing all MAS contractors with the opportunity to view RFQs within and across SINS is consistent with requirements of FAR 8.4. As you know, the FAR requires that for MAS orders exceeding the Simplified Acquisition Threshold, contracting officers must:

1. Post the RFQ on eBuy to afford all schedule contractors offering the required supplies or services under the appropriate multiple award schedule(s) an opportunity to submit a quote; or
2. Provide the RFQ to as many schedule contractors as practicable to reasonably ensure that quotes will be received from at least three contractors that can fulfill the requirements. Transparency of RFQs within and across SINS will ensure that this regulatory mandate is met and increase the usefulness of eBuy for customer agencies.

As such, the Coalition recommends that GSA increase the transparency of eBuy by enabling MAS contractors to view requirements across SINS. Such functionality will facilitate delivery of better solutions by MAS contractors for customer agencies and the American taxpayer.

As always, the Coalition appreciates your openness to suggestions to improve the efficiency and effectiveness of the MAS program. We would appreciate an opportunity to meet

with you concerning the transparency of eBay. Please let me know if you have any questions and we look forward to hearing from you.

Sincerely,

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

Roger Waldron

President