



May 30, 2024

Joel Lundy
Director, Office of IT Products
Information Technology Category (ITC)
Federal Acquisition Service (FAS)

Subject: Draft ASCEND BPA Performance Work Statement

Joel,

The Coalition for Government Procurement (“the Coalition”) sincerely appreciates the opportunity to comment on the Draft ASCEND Blanket Purchase Agreement (BPA) Pool 1 Solicitation. Attached, please find a spreadsheet of anonymized member responses to the Office of Management and Budget’s (OMB’s) questions. Please be advised that the spreadsheet comments do not necessarily reflect the consensus view of the membership.

By way of background, the Coalition is a non-profit association of small, medium, and large businesses that offer 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 General Services Administration (GSA) Multiple Award Schedules (MAS) program, VA Federal Supply Schedules (FSS), Government-wide Acquisition Contracts (GWAC), and agency specific multiple award contracts (MACs). In fiscal year 2023, Coalition members accounted for over \$8 billion in sales to the Federal Government for cloud computing and cloud-related IT professional services. In addition, members represented nearly two-thirds of Cloud Special Item Number (SIN) sales under the GSA MAS Program. We are proud to have worked with Government officials for more than 40 years towards the mutual goal of common-sense acquisition.

The Coalition appreciates GSA’s engagement with industry in the development of the acquisition strategy for the ASCEND BPA. Coalition members encourage GSA to rely upon Cloud Service Providers (CSPs’) industry standard practices and requirements to the greatest extent possible. As the BPA seeks to purchase commercial services and enable access to the widest catalog, it should not mandate additional agency-unique, non-standard terms/requirements that impose additional burdens on CSPs because doing so could result in increased costs and prohibit CSPs from offering their full range of services.

GSA should provide the flexibility for customer agencies to include non-standard and specific requirements at the task order (TO) level under the BPA as their missions require rather than defining such requirements at the BPA level. Mandating numerous nonstandard, customer agency unique requirements at the BPA level increases complexity and uncertainty in contract performance. This “over-specification” at the BPA level will increase costs, unnecessarily limit competition, and reduce access to



innovation. The unintended consequence of this acquisition strategy will be to limit access to best value solutions that meet customer agency mission needs.

Members would like to understand the market segment ASCEND is attempting to fill and would like additional information on GSA's plan for this vehicle within its portfolio of cloud services contract vehicles. Currently, GSA has a variety of options to provide customer agencies with cloud services. Almost 800 contractors are on the GSA MAS Cloud SIN to support a broad array of cloud requirements for Federal customers. Additionally, agencies use information technology (IT) GWACs to purchase cloud services, such as Alliant 2. ASCEND may duplicate the services offered on other vehicles, reducing the incentive for vendors to participate and will limit competition, value, and access to innovation. In addition, the lack of commitments from customer agencies will disincentive companies from making the necessary investments to participate and compete for a place on the BPA, thereby unnecessarily limiting competition. By providing information regarding potential agency commitments, GSA will ensure a robust competitive cloud market that will provide the best value to agency customers.

Members also would like further information on how complex cloud migration and modernization efforts will be procured given the breakup of services and products into three separate pools. This division may require ordering agencies to break their requirements into multiple solicitations per each sub pool. This approach is not consistent with industry practice and government acquisition patterns and may lead to increased complexity and higher costs.

Thank you again for considering Coalition member comments in response to the draft ASCEND BPA solicitation. Please contact me if you have any questions or concerns.

The Coalition hopes that you find these comments useful and thanks you for your time and consideration.

Sincerely,
Roger Waldron

A handwritten signature in black ink, appearing to read 'Roger Waldron', is written over a light gray rectangular background.

President

cc
Lawrence Hale
Deputy Assistant Commissioner, Category Management

Table 1. Ascend BPA Draft PWS Questions/Comments/Recommended Answer/Solution and Rationale					
#	Question	Dec 2023 PWS Reference (section number)	May 2024 PWS Reference (section number)	Comment	Recommended Answer/Solution and Rationale
1		Overall	Overall	Consider Standard Commercial Terms. To streamline the Federal Government's ability to take advantage of the latest technological innovations in the commercial sector, GSA should consider removal or revision of non-commercial terms in its BPA that are not standard to the commercial marketplace, nor in line with FAR 52.212-4 and -5. By aligning GSA's BPA to commercial standard terms, customers will be better positioned to submit an offer that will provide ordering agencies with direct access to our comprehensive and broadly adopted cloud, with over 200 fully featured services.	
2		Overall	Overall	Negotiate Terms at the Task Order Level. Where non-commercial terms are required for government agencies' mission success, industry continues to encourage GSA to consider making such terms optional and negotiable at the task order level. This will maximize a CSP's ability to perform task order requirements, and encourage competition with all CSPs at the BPA level. This will also allow each ordering entity to review and ensure that only applicable terms are accurately applied to their specific scopes of work under a TO, and to better align each TO with the provision of cloud services that are customarily available in the commercial marketplace. For example, to reduce costs at the BPA level, Clearance Levels (4.5.10) should be applied at the TO level for those individuals supporting customers' requirements.	
3		Overall	Overall	Additional Cost/Investment of Non-Commercial Terms. Many of these non-commercial requirements may require additional cost and investment by CSPs to modify our commercial processes to operate our services under this BPA as written. For example, requiring authorized vendors to develop a bespoke service catalog (4.4.2) and Climate Risk Management Plan (4.7.1), which is not commercial industry practice, may require CSP investment to develop and manage. Also, GSA is asking authorized vendors to be responsible for costs if unauthorized services are used (4.4.1.2.3). CSPs can offer customers tools that can help them limit access to unauthorized services, but it is ultimately the customer's responsibility to ensure they are not using unauthorized services. Where GSA is not open to revising its BPA terms to align to commercial industry standards, industry requests GSA consider, for all CSPs offering in this opportunity, funding a minimum guarantee or allowing for Program Management Office costs to cover these additional investments.	
4		Overall	Overall	Adhere to Standard CSP Shared Responsibility Models. GSA is asking authorized vendors to provide logical access logs (4.5.27.1.1) to GSA, and to authorized assessment and evaluation entities. To help ensure maximum security, GSA should not have authorized vendors provide logical access logs. Customers have the capability to access these logs themselves, and GSA should be independently providing logs only to entities it validates should be receiving them.	
5		Overall	Overall	Use Commercial Standard Compliance Requirements. our organization reports cybersecurity incidents to regulators in accordance with the applicable regulatory requirements outlined by FedRAMP and DISA. Following the discovery of a confirmed breach that results in the loss, disclosure or alteration of covered defense information, CSPs conduct a review of their network and submit a report through DIBNet within 72 hours (provided we are not prohibited from doing so by a court order or other legal requirement). We recommend GSA use these commercial standard practices—instead of requirements like 4.5.16—to help ensure it does not incur additional operational costs.	
6		Overall	Overall	Address Stringent Security Requirements at the TO Level to Preserve Flexibility. The draft PWS contains clearance and citizenship requirements that are suitable only for Top Secret and Secret workloads. While certain TOs may necessitate such requirements, implementing them at the BPA level or having them apply to Sub-Pool 1-1 and Sub-Pool 1-2 will prevent GSA from being able to access commercial regions suitable for FedRAMP Moderate and in some cases FedRAMP High workloads. Furthermore, access to classified cloud services will depend upon the ordering agency's ability to establish security agreements with the cognizant security agencies authorizing those classified services; including these requirements at the BPA level will not in and of itself ensure classified services are available.	
7		Overall	Overall	Encourage Robust Competition. In considering and making our recommended revisions to the BPA terms, GSA will encourage broad competition to the benefit of the Federal Government and taxpayers. Keeping BPA terms unchanged would impose contract requirements that are not standard for a commercial contract and would be challenging and burdensome for all CSPs to operationalize. We are concerned that such bespoke terms may impede our ability to operate at scale, innovate on behalf of all customers, and keep prices low. It may also result in CSPs being excluded from this competition, which would be contrary to Federal Acquisition Regulation competition principles.	
8		Overall	Overall; Sub-Pool 3	Recommend GSA clarify that access to classified cloud services will depend upon the ordering task order agency ability to establish security agreements with the cognizant security agencies authorizing those classified services. CSPs cannot simply grant access to classified resources without cognizant security agency approval.	
9		Overall	Overall	Much of the feedback provided in this document recommends that BPA requirements are either removed or imposed at the Task Order level. We encourage GSA to rely upon the commercial cloud service providers' standard security controls. Since the BPA seeks to purchase commercial services and enable access to the widest catalog of services, the BPA should not seek to enforce non-standard controls that impose additional burdens on the CSPs because that could result in increased costs and the inability of CSPs to offer their full range of services. Recommend any non-standard requirements be imposed at the Task Order level to enable CSPs to determine if they want to pursue the opportunity instead of potentially limiting competition at the BPA level.	
10		4.2.6.3.2 - Incidents	4.4.1.2.2. Incidents	Recommend that GSA clearly define incidents that are discussed here.	
11		4.2.6.3.3 - Unauthorized Cloud Services	4.4.1.2.3. Unauthorized Cloud Services	We recommend removal of this clause because CSPs provide offerings that allow users to restrict their access to only services authorized at the TO level. Further, the goal of the BPA should be to allow all CSP services on their respective catalog or to enable task order agencies to purchase services not on the catalog as "open market" purchases which aligns with standard GSA practices.	
12		4.2.7. - Service Catalogs - Attachment XX Service Catalog Final Formats	4.4.2. Services Catalogs - Cloud Services	GSA should consider relying on already established GSA MAS service catalogs.	
13	Can GSA please clarify what accounting systems contractors shall provide to support the accounting and management of cloud services?	4.2.8. Utilization Based Discounts	4.4.3. Utilization Based Discounts		
14	Can GSA please define the term data and data access to allow CSPs to understand what information shall be limited to US persons?	4.3.2.6 - Ownership, 4.4.2 - Data Access - US Persons	4.6.2. Data Access - US Persons	Recommend that this requirement be removed from the BPA and instead allow Task Order agencies to address these types of requirements in their specific orders or make these requirement applicable to only the correct Sub-Pool. CSPs are commercial service providers with commercial infrastructure that includes the latest technologies) and restricting access to only US Persons may unnecessarily restrict the Government from accessing the full scope of a CSPs commercial services which undermines the purpose of this BPA. Further, not all agencies require this level of restriction.	
15		4.3.3. - Annual Cybersecurity Assessment	4.5.3. Annual Cybersecurity Assessment	CSP already have robust cybersecurity requirements imposed by FedRAMP, CC SRG, executive orders, and FAR provisions. The GSA should not impose additional and likely duplicative cybersecurity assessments on commercial services. Recommend that GSA clearly state that already established assessments apply to these BPA requirements.	

16		4.3.4.4. Cybersecurity Vulnerabilities Reporting	4.5.22. Cybersecurity Vulnerability Reporting	For containers or virtual machines, to the extent a TO agency wishes to assess vulnerability postures, they can use CSP services to detect those and not rely on reporting alone.	
17		4.3.5.6 - Public Disclosure and Release	4.5.4.6. Public Disclosure and Release	Recommend removal of this requirement as a commercial service, but if not recommend GSA clarify what it means by "evaluation public disclosure and releases prior to release" to clarify what the requirement is and how CSPs determine which public disclosures apply, and that this is addressed at the TO level.	
18		4.3.6-4.3.6.2 Authorization to Operate; Findings and Recommendations, Provisional Authority	4.5.5. Authorization to Operate; 4.5.5.1. Findings and Recommendations; 4.5.5.2. Provisional Authority	Recommend GSA define what "A&A" activities, findings and recommendations are. Further, recommend that GSA clarify that CSPs can provide standard documentation to meet this requirement and do not need to produce net new documentation. Also request that GSA confirm system of record for ATO packages (e.g. eMASS or something else).	
19		4.3.7 - Banner and Consent to Monitor	4.5.6. Banner and Consent to Monitor	Recommend removing this requirement as it does not follow standard commercial services practice. Further, GSA does not establish who will be monitoring and how that monitoring will take place.	
20		4.3.10-4.3.11 - Clearance Levels - Facility, Clearance Levels - Persons	4.5.9. Clearance Levels - Facility; 4.5.10. Clearance Levels - Persons	Recommend that GSA clarify that 4.3.10-4.3.11 requirements apply at the task order level and not at the BPA level. Further, GSA should acknowledge that access to secret and top secret services will require the task order awarding agency to establish security agreements with any applicable cognizant security authority for those services. We also recommend GSA clarify that TOs can be awarded without FCL or personnel clearance requirements.	
21		4.3.4.3 - Cybersecurity Incidents Reporting	4.5.16. Cybersecurity Incident Reporting	Request that GSA please clarify what constitutes a cyber security incident. We recommend that GSA clearly state FedRAMP cybersecurity incident reporting requirements for native CSP services can be used to address the BPA requirements.	
22		4.3.15 - Cybersecurity Incident Reporting	4.5.16. Cybersecurity Incident Reporting	We recommend the Government change "Cybersecurity incidents reporting timelines (e.g., deadlines) shall start when cybersecurity incidents are discovered by authorized vendors or reported to authorized vendors, authorized vendors' persons (e.g., employees, representatives, sub-contractors), or authorized vendors' cybersecurity entities responsible for providing cybersecurity monitoring and response for authorized vendors." to "Cybersecurity incidents reporting timelines (e.g., deadlines) shall start when cybersecurity incidents are confirmed by authorized vendors or reported to authorized vendors, authorized vendors' persons (e.g., employees, representatives, sub-contractors), or authorized vendors' cybersecurity entities responsible for providing cybersecurity monitoring and response for authorized vendors."	
23		4.3.15.1 - Administrative Agency	4.5.16.1. Administrative Agency	Request the Government please provide the intent of this clause. Please confirm the intent of this clause is for the reporting to be to the TO-awarding agencies.	
24		4.3.15.2 - United States Department of Homeland Security, 4.3.15.3 - United States Department of Defense	4.5.16.2. United States Department of Homeland Security; 4.5.16.3. United States Department of Defense	We recommend removal, but if not, we recommend that GSA clarify that these requirements apply at the TO level, as reporting is determined by the customer.	
25		4.3.17.1 - United States Department of Homeland Security, 4.3.17.2 - United States Department of Defense	4.5.18.1. United States Department of Homeland Security; 4.5.18.2. United States Department of Defense	We recommend removal, but if not, we recommend that GSA clarify that these requirements apply at the TO level, as reporting is determined by the customer.	
26		4.3.19.1 - United States Department of Homeland Security, 4.3.19.2 - United States Department of Defense	4.5.20.1. United States Department of Homeland Security; 4.5.20.2. United States Department of Defense	We recommend removal, but if not, we recommend that GSA clarify that these requirements apply at the TO level, as reporting is determined by the customer.	
27		4.3.23 - Geographic Location - Cloud Services	4.5.24. Geographic Location - Cloud Services	We recommend the Government require all authorized vendors to have an offering that provides for US-located services and US persons and applying this requirement to the applicable Sub-Pool, but not restrict all work under this BPA to US-only, as certain users may require OCONUS access (e.g. State Department, USAID)	
28		4.3.24 - Information Assurance Vulnerability Management	4.5.25. Information Assurance Vulnerability Management	Recommend removal of this clause, but if not, recommend that this is optional at the TO level but not required at the BPA level.	
29		4.3.26 - Logical Access	4.5.27. Logical Access	We recommend these Logical Access requirements be optional at the TO level but not required at the BPA level. This requirement as written will restrict BPA users to a subset of the available commercial cloud offerings.	
30		4.3.29 - Physical Access	4.5.30. Physical Access	We recommend these Physical Access requirements be optional at the TO level but not required at the BPA level. This requirement as written will restrict BPA users to a subset of the available commercial cloud offerings.	
31		4.3.34 - Testing - Eligible User Solutions	4.5.37. Testing - Eligible User Solutions	Recommend removal of this clause but if not, recommend that this is optional at the TO level but not required at the BPA level.	

32		4.3.34.1 - Testing Techniques	4.5.37.1. Testing Techniques	<p>Recommend adding the following bullets:</p> <ul style="list-style-type: none"> - Denial of Service testing is considered unauthorized unless approved by the Vendor - Testing activities must stay within the bounds of IaaS, PaaS, and SaaS solutions configured by the user. - Testing that includes or exceeds the boundaries of Vendor Internal infrastructure (such as hardware, software, and networking regions) are unauthorized unless approved by the Vendor. - Testing activities that escape the confines of cloud services such as jailbreaking or sandbox escaping into Vendor internal infrastructure are unauthorized unless approved by the Vendor. 	
33		4.4 - Data Requirements - Baseline	4.6. Data Requirements - Baseline	Recommend that GSA consider that CSPs are not responsible for the location of government data.	
34		4.4.8 - Data Location	4.6.8. Data Location	Recommend that GSA remove or make this requirement applicable to specific Sub-Pools. CSPs enable end users to select where they place their data, whether within the US or otherwise. This decision is outside the control of the CSPs and CSPs are not responsible for the decisions of the end customers. Further, certain USG entities may want their data to be stored outside the US (e.g., the State Department or DoD elements located overseas), so restricting that option may reduce the BPAs applicability to all USG use cases. If removing this section is not possible, recommend changing the requirement to "CSPs shall offer End Users the ability to store their data within the US." Suggest GSA also replace the second bullet with "Authorized user data that could expect to result in damage to the customer shall be identified in the eligible users' TOs"	
35		4.4.13 - Data Sharing - Unauthorized, 4.4.14 - Data Management Incident Reporting, 4.3.15 - Data Management Incident Response	4.6.13. Data Sharing - Unauthorized; 4.6.14. Data Management Incident Reporting; 4.6.15. Data Management Incident Response	Please consider the determination that FedRAMP in consultation with OMB made regarding M-21-31. The determination was made that the requirements of M-21-31 do not apply directly to Cloud Service Provider (CSP) offerings unless that CSP is a government system; this determination is applicable to this requirement, because it notes that CSPs are required to support agency requirements to secure data etc; however, CSPs are not principally responsible.	
36		4.4.20 - Judicial or Law Enforcement Orders	4.6.20. Judicial or Law Enforcement Orders	Request GSA clarify the intent of this section.	
37		4.4.21 - Software Ownership	4.6.21. Software Ownership	Request GSA provide additional information on the intent of this section and the definition of software.	
38	Climate Risk Management Plans are not commercial service industry standard. Would GSA consider removing this requirement or allowing a Business Continuity Plan to meet this requirement?	4.5.1 - Climate Risk Management Plans, 4.5.1.1 - Climate Risk Management Plan - Annual Updates	4.7.1. Climate Risk Management Plans, 4.7.1.1. Climate Risk Management Plan - Annual Updates		
39		4.5.2 - Electronic Waste Recycling	4.7.2. Electronic Waste Recycling	Recommend GSA add language to this saying "in the event an existing recycler becomes unavailable, authorized vendors can use recyclers that may not have certification but that are vetted and engaged consistent with ISO14001-certified global EMP, which aligns with the ewaste certification standards."	
40		4.8.2.1.2 - Budget Containment	4.10.2.1.2. Budget Containment	We recommend this clause be changed to "Authorized vendors shall provide the capability for users to suspend (e.g., pause) cloud services (i.e., IaaS, PaaS) when cloud services have exceeded their budgets (e.g., cost containment) to support eligible users financial management and monitoring of cloud services (e.g., FinOps). When cloud services are suspended, authorized vendors shall not delete eligible users data from data storage devices (e.g., cache, primary, secondary, backups, archives)." There are customers (such as DHS, DOD, DOJ) with mission-critical workloads that would not want their services automatically shut off when their budget is exceeded. We provide capabilities that can alert customers when budget is exceeded and allow them to take their desired action.	
41		4.8.5.1 - Carbon Pollution-Free Electricity	4.10.5.1. Carbon Pollution-Free Electricity	Recommend changing this language to say "Authorized vendors shall offer regions that consume energy attributable to 100% renewable energy to power cloud services to support eligible users compliance with environmental and sustainability legislation, regulations, and policies"	
42		4.8.5.1.3 - Service Catalogs - Carbon Pollution-Free Electricity	4.10.5.1.3. Service Catalogs - Carbon Pollution-Free Electricity	Recommend GSA revise this language to "Authorized vendors shall identify which cloud regions consume electricity attributable to 100% renewable energy to support eligible users selection of cloud services that satisfy environmental and sustainability legislation, regulations, and policies."	
43		4.8.8.1.3 - Service Catalog	4.10.8.2.1. Service Catalogs	Recommend removal of this requirement. CSPs can identify those services that are FedRAMP Moderate, FedRAMP High and/or meet other requirements, however Customers should have access to all CSP cloud service offerings to allow them to make their own determination as to which services to use based on their own security needs.	
44		4.8.8 - Sub-Pool 1-1: Federal Risk and Authorization Management Program: Moderate / Department of Defense Cloud Authorization Services Impact Level: 2, 4.8.9 - Sub-Pool 1-2: Federal Risk and Authorization Management Program: High and Department of Defense Cloud Authorization Services Impact Levels: 4, 5	4.10.8. Sub-Pool 1-1: Federal Risk and Authorization Management Program: Moderate / Department of Defense Impact Level: 2	We recommend removal of this clause. If not, we recommend GSA provide better clarity on the intent of Section 4.8.8 and 4.8.9. Task Order awarding agencies should have the freedom to determine their own requirements as it related to their awards. Imposing arbitrary requirements will only limit the usage of the BPA in favor of less restrictive vehicles. Further, the need for security clearances or public trust reviews will create an administrative burden and cost on CSPs and the USG in adjudicating those determinations. Recommend that GSA consider existing CSP commercial service practices when crafting these types of requirements.	
45	Can GSA please provide the referenced "Appendix XX" to vendors in draft form for industry feedback in advance of final procurement?	17 - Section 508 Accessibility Standards	4.3.2. Section 508 Compliance	CSPs are committed to improving the accessibility of the Services, and will continue to review and evaluate the accessibility of the Services as well as internal and external accessibility guidance (such as, for example, Section 508 of the Rehabilitation Act of 1973 and the Web Content Accessibility Guidelines 2.1 Conformance Level AA Success Criteria, as amended and updated over time). Upon request, CSP will provide information about the accessibility of the Services, including any available accessibility conformance reports. Contractor shall provide Accessibility Conformance Reports to demonstrate how the cloud services are accessible to users with disabilities, and to show how the services align with Section 508 requirements. CSP will provide Customer with a mechanism for reporting accessibility defects, and will use commercially reasonable efforts to address those defects in accordance with our internal processes for prioritization and remediation.	

46		18 - Special Requirements	18 Special Requirements	Recommend that GSA remove all Section 18 "Special Requirements" and accept CSPs standard commercial terms in accordance with 52.212-4/552.212-4. Cloud services are commercial services and the GSA should accept a CSPs standard commercial terms for the BPA and allow ordering agencies to impose additional requirements as their specific needs require. Imposing these additional terms at the BPA is not in accordance with standard FAR Part 12 acquisitions nor 52.212-4/552.212-4.	
47	Can GSA please define various contract types which may conflict with language stating that orders shall be firm fixed price in accordance with pricing established in the awarded BPA.		Instructions to Offerors - 2, Order Type		
48	What is the Government's rationale for releasing separate solicitations for each Pool?	General	General	Based on currently available information, it appears that the Government's intent is to release individual RFPs per pool.	Based on best practices on other vehicles with a similar structure, such as OASIS+, we believe that it is feasible and more efficient to combine the efforts into one single solicitation. In this construct, offerors can respond to individual pools and sub-pools, which is similar to the domains that GSA used on OASIS+. This reduces continuous evaluations for the Government. We recommend that the Government adopt a self-scoring evaluation methodology which has been used widely by GSA and many other Federal agencies. A tool like Symphony could also be leveraged to bring automation to the process, which eases the evaluation burden on the Government and streamlines the process to make an award.
49	What evaluation approaches has the Government considered for the ASCEND BPA?	General	General	The evaluation criteria provided by the Government is similar to other recent acquisitions with primarily pass/fail criteria.	We recommend that the Government provide that criteria as soon as possible, so that potential offerors can assess their ability to meet the evaluation criteria. By providing this information sooner, this will give industry sufficient time to ask questions and to provide recommendations to the Government, which will help the Government finalize its ultimate RFP more quickly.
50	Can the Government please provide details on the sub-pools and what the evaluation criteria will be to qualify?	General	General	The Government has not provided much detail on the specific criteria and areas within the sub-pools under Pools 1, 2 and 3.	We recommend that the Government consider streamlining this requirement to align more closely to the method used on OASIS+ where projects are included within the submission along with CPARs and other contractual documents along with FPDs data with the use of annotations. By taking this approach rather than the written narrative, the Government can clearly assess an offerors success in their past performance references without the need to evaluate hundreds of offerors written narratives. In addition, the use of PPQs may place a burden on customers to complete when instead, the Government can elect to use CPARs, which match the requirements provided in the PPQs. By using this approach, we feel that the evaluation process for the Government will be streamlined.
51	Will the Government consider a more streamlined approach to past performance like OASIS+ did to better align to the rest of the proposal requirements being pass/fail?	Volume III: Past Performance	Volume III: Past Performance	In the draft Section L&M, the Government has defined the criteria for past performance; however, having one adjectively rated section with the rest being pass/fail may complicate the evaluation for the Government.	We recommend providing a ceiling for the BPA, so that industry can determine if pursuing this vehicle aligns to their corporate business cases. By providing the ceiling to industry, this has the potential to right size the vehicle to the offerors that are best suited to support future cloud initiatives and that will qualify, which will ensure this is a successful BPA for Federal agencies.
52	Can the Government please provide the planned ceiling per pool or the total ceiling for the BPA?	General	General	By establishing a ceiling, this will help the Government to determine the amount of customers that can use this vehicle and types of projects that can be procured through the BPA.	Since the Cloud SIN already exists as well as other IT MA/IDIQs to purchase cloud services, such as Alliant 2, it appears that this BPA may duplicate the services offered on other vehicles. We are interested in understanding how this vehicle will be used differently than existing vehicles and if there is a pipeline of planned work on the ASCEND BPA.
53	Can the Government provide information on customers that plan to utilize this vehicle?	General	General	It would be helpful for industry to understand potential customers that plan to utilize this vehicle once awarded.	In order for industry to properly resources pursuits on the BPA, it would be useful for us to understand the size of future call orders and the volume expected.
54	What is the average range in value of call order planned on the ASCEND BPA?	General	General	It would be helpful for industry to understand the rough size of planned call orders.	Since these are typically standard requirements, we recommend that these requirements roll-up to the pool level and also that all pools be evaluated under the same solicitation for maximum efficiency.
55	Is it the Government's intent to require Acquisition / Business / Data / Cybersecurity / Environmental & sustainability requirements / Operational / Technical Requirements at the pool level?	Volume II: Technical Evaluation Factors	Volume II: Technical Evaluation Factors	We recommend that these requirements apply to the pool level.	
56	How will the Government address call order competitions for requirements that span across multiple Pools and Sub-Pools? How does the Government plan to meet wider scale complex IT procurements that span both between pool/sub-pool and to areas outside of cloud?	General	General	IT acquisitions often encompass multiple labor categories and types of work, some of which could be focused on cloud-related activities, but there could be other IT activities outside of cloud that need to be conducted to meet Government requirements.	We recommend that GSA provide some clarification on how this vehicle is intended to be used and potentially describe a real world customer requirement that is slated to be procured on the ASCEND BPA, so that industry has a better understanding of the type of work planned.
57	What is the minimum confidence rating and minimum relevance rating for past performance to be considered to meet the criteria?	Instructions to Offerors, Section 8, Evaluation and Basis of Award	Instructions to Offerors, Section 8, Evaluation and Basis of Award	The ITO states "Award shall be made to those responsible quotes with a technically acceptable quote. Technical acceptability is defined as a quote which meets all requirements as outlined in the Performance Work Statement (PWS) date TBD."	What is the minimum confidence rating and minimum relevance rating to be considered to meet the Pass criteria? The Past Performance evaluation appears to be in conflict with the statement in Section 8 since it uses a qualitative evaluation instead of Pass/Fail.
58	Why are past performance citations and PPQs required at the BPA level regarding professional services (Pool 3)?	Instructions to Offerors, Past Performance evaluation.	Instructions to Offerors, Past Performance evaluation.	PP citations and PPQs at the BPA creates an unnecessary evaluation step since Pool 3 will need to ask for PP citations and/or PPQs for experience that is specific to a call order technical solution.	For Pool 3, the Government will need to have PP Citations and/or PPQs that are specific to a IaaS, PaaS, or SaaS solution at the call order level in order to get qualified bidders. We recommend the Government not require PP citations/PPQs for the BPA level for Pool 3, but rather require those at the call order level.
59	Will teaming arrangements be allowed at the call order level?	Instructions to Offerors, Past Performance evaluation.	Instructions to Offerors, Past Performance evaluation.	CTAs are allowed at the BPA to count as a PP citation under the conditions outlined in the ITO.	CTAs at the BPA level are allowed according to the instructions to offerors. We strongly recommend that BPA holders are allowed to add new teaming partners at the call order level since an 8-year PoP creates a situation where new SaaS solutions may become available that might require new teammates for the BPA holders on future call orders.
60	Will the Pool 3 BPA be used for major modernizations in the Federal Government such as moving an HR, Financial, Supply Chain, etc. system to a SaaS solution or moving entire functional applications from on-premise to IaaS/PaaS platforms?	General	General	Will Pool 3 be limited professional services to technical support or will major transformation/modernization contract opportunities also be done under Pool 3.	Major functional system transformations/modernizations to new solutions such as SaaS can be hundreds of millions of dollars over 5 - 7 years. Will the BPA Pool 3 be used for those types of large contracting actions or will it be limited to more modest technical support services (i.e. less than \$50M call orders)?
61	Will the Government provide more information, detail, and requirements for pools two and three?	PWS BPA pool 1	PWS BPA pool 2	Information is limited, only a high-level outline for pools two and three.	We recommend the Government provide mature PWS areas for pools two and three to provide industry the opportunity to determine capabilities the Government plans on including in those pools.
62	Will the Government provide a pipeline of planned opportunities to allow industry to better forecast which opportunities to target?	General	General	Other acquisition organizations such as Army Contracting Command-Aberdeen (ACC-APG) provide a pipeline of planned task orders on the RS3 vehicle.	We highly recommend that the Government work with its customers to provide a detailed pipeline of planned future efforts to be procured through the pools and sub-pools. This will allow industry to provide better feedback to the Government on future acquisition strategies, establishing better value and sufficient competition.
63	The Government mentions on-ramps in the Draft RFP for Pool 1, but does not provide details on the specifics. At which duration will on-ramp occur?	PWS BPA Pool 1	PWS BPA Pool 2	On-ramps are useful to maintain active participation and a manageable sized vehicle.	We recommend that the Government consider allowing for future offerors to on-ramp on the ASCEND BPA as company's capabilities can expand over time due to acquisitions or contract wins on other vehicles focused on cloud computing.
64	What are the key differences the Government sees between the existing Cloud SIN on the GSA MAS versus the ASCEND BPA?	General	General	It appears that the existing Cloud SIN already allows Federal agencies to procure cloud services, including leveraging other IT SINs for broader IT acquisitions.	We are interested in understanding why the Government is pursuing the ASCEND BPA when the Cloud SIN is already in place with nearly 800 potential offerors to support a broad array of cloud requirements for Federal customers.
65	In the latest Interact Post, GSA refers to its plan for a phased acquisition, procuring the pools in separate solicitations. What is the Government's rationale for doing a phased acquisition rather than one consolidated solicitation with all 3 pools?	General	General	A phased acquisition will delay some Federal customers in accessing cloud services on the ASCEND BPA while waiting for awards to be made for all pools.	Consolidating the pools into a single RFP will streamline the acquisition for the Government and provide an opportunity for Federal customers to use the vehicle earlier instead of waiting for contracts to be awarded for each pool.
66	Will customers still have the option to use the Cloud SIN or will they have to use the ASCEND BPA?	General	General	Understanding of plan with the existence of the Cloud SIN and the ASCEND BPA.	We are interested in gaining an understanding of the Government's plans as it pertains to the existing Cloud SIN on the GSA MAS.
67	What is the total amount of funding that Federal agencies have put against the Cloud SIN?	General	General	Understanding of the scale of cloud requirements and how agencies are procuring these services.	We are trying to get a sense of the amount of funding that could potentially go on the ASCEND BPA and if possible, by pool.
68	Has GSA identified any criteria or threshold for opportunities to be considered for Fair Opportunity rather than set-aside for small business or will this be defined through the use of market research at the call order level?	General	General	We encourage GSA to utilize market research at the call order level to ensure Federal Agencies have an understanding of potential offeror's capabilities.	The use of market research enables the Government to understand a potential number of offerors that may be able to compete at the call order level. Market research also allows industry to comment on draft documentation to help agencies fine tune future solicitation requirements.
69	Can the government clarify what is meant by "The submission must identify the requisite authorization level identified in the PWS for the sub-pool an award is being sought for.?"	7: Compliance Review FACTOR 1—authorization level	7: Compliance Review FACTOR 1—authorization level		
70	Will the government provide an example of "sufficient detail to support an effective evaluation"? What is the expected threshold for a PASS score? Given multiple sub-pool releases, will the government require vendors to submit separate proposals for each sub-pool bid?	Volume II: Technical Evaluation Factor 5:	Volume II: Technical Evaluation Factor 5:		
71	For example, if Pool 1 has 3 subpools, should we submit 3 independent proposals, or should we submit a single response with common elements to address multiple subpools that are being bid.	General	General		

72	Will the government allow the submission of latest CPARS report for each of our quals, instead of PPOs?	General	General	
73	How will the government evaluate subcontractor capabilities?	General	General	
74	Please clarify if this is truly competitively awarded where you limit the number of awards OR is "Qualification and Onboarding". Qualification meaning you meet the requirements for the vehicle and onboarding meaning you meet the requirements for the vehicle and are being added to it (the MAS or SINS). If the intent of this vehicle is to be open to any who meet the requirement the suggestion is to change wording from competitively awarded to something that describes the qualification and onboarding process for initial subawarding as well as subsequent process following initial onboarding (meaning will it be like current MAS or SIN application).	Sub-pools to be independently solicited and competitively awarded. 3. Scope, Page 11.	Sub-pools to be independently solicited and competitively awarded. 3. Scope, Page 11.	
75	Following initial procurement, will there be an open enrollment for any new Cloud Service Provider offerings that meet the requirements of the BPA sub-pool? Please clarify that this vehicle is a "living" vehicle. Meaning like MAS or SINS that new entrants can be placed on the vehicle if they meet requirements for same. Please provide description of the on-boarding process following initial procurement/onboarding. How are new offerings added "post award" to the Cloud SIN migrated over to this vehicle?	4.3.3, Page 15	4.3.3, Page 15	
76	Please clarify what facilities you are referring to... Government facility, Contractor facility. Suggested language: "Any person accessing the CSP Data Center must meet clearance requirements as specified in each respective TO"	Facility clearance levels, 4.5.9, Page 23	Facility clearance levels, 4.5.9, Page 23	
77	Please provide greater detail around the specific roles that require clearance. For standardization purposes, are there specific roles within for example the CSP Data Center that constitute levels 1-5? Develop standard roles within the Data Center and specify clearance directly against those roles.	Personnel clearance levels, 4.5.10, Page 24	Personnel clearance levels, 4.5.10, Page 24	
78	Please describe how contractor personnel will be monitored and surveilled. What exrolental would be issued to a contractor personnel and for what purpose would it require monitoring (For Pool 1).	Personnel monitoring and surveillance, 4.5.11.3, Page 25	Personnel monitoring and surveillance, 4.5.11.3, Page 25	
79	Please describe how cybersecurity reporting is done when CSP services are provided through a Value-Added Reseller. Clarity needs to be provided to determine who is responsible for reporting. Is it the Reseller or the CSP or both. If both, what is the process for aggregating the data for submission within specified timeframes.	Cybersecurity reporting, 4.5.16, Page 28	Cybersecurity reporting, 4.5.16, Page 28	
80	Clarity needs to be provided around the role and responsibility of the CSP and Reseller with respect to these requirements (across the board)	Roles and Responsibilities, General	Roles and Responsibilities, General	
81	What is the process for requesting the waiver? Please define the requisite law, rule, regulation, procedure for requesting a waiver and who is responsible for requesting it (CSP or requesting government entity)?	Geolocation waivers, 4.5.24.1	Geolocation waivers, 4.5.24.1	
82	Is there a waiver for this requirement if a waiver has been requested and granted per 5.5.24.1? Stipulate that a waiver is also appropriate here if a geolocation waiver has been granted pursuant to 5.5.24.1.	Logical Access, 4.5.27	Logical Access, 4.5.27	
83	If a VAR or Reseller is reselling a partner CSP offering who is responsible for compliance? Clarify roles and responsibilities for compliance when a reseller is offering a partner CSP offering. For example: is the Reseller responsible for determining who has access to the CSP's data center?	Logical Access, 4.5.27, Page 39	Logical Access, 4.5.27, Page 39	
84	Who certifies or warrants that the Phishing resistant solution complies with standards? Specify who is responsible for certifying that the MFA solution meets phishing resistant standards.	Multi-Factor Authentication - Phishing Resistant, 4.5.29, Page 40	Multi-Factor Authentication - Phishing Resistant, 4.5.29, Page 40	
85	Is there a waiver for this requirement if a waiver has been requested and granted per 5.5.24.1? Stipulate that a waiver is also appropriate here if a geolocation waiver has been granted pursuant to 5.5.24.1.	Physical Access, 4.5.30, Page 41	Physical Access, 4.5.30, Page 41	
86	Is there a waiver for this requirement if a waiver has been requested and granted per 5.5.24.1? Stipulate that a waiver is also appropriate here if a geolocation waiver has been granted pursuant to 5.5.24.1.	Data Access - US Persons, 4.6.2, Page 45	Data Access - US Persons, 4.6.2, Page 45	
87	DAHP solution specifications, are these different from DAHP solutions that would be natively provided by the CSP at the specified FedRamp or DCAS II for the specific sub-pool? Please clarify which is which.	Data At Rest Protection, 4.6.3, Page 45	Data At Rest Protection, 4.6.3, Page 45	
88	Creating an initial ceiling on prices that can't increase for 8 years is inconsistent with normal business practices. Since this is a potential 8.5 year BPA, GSA should consider allowing an increase to the Price adjustment for any new orders where the GSA MAS prices have increased. Due to the rapid change of the Cloud offerings, will GSA consider allowing the price of the BPA to fluctuate during the term of the BPA, consistent with the MAS Contract adjustments.	15. Pricing, PWS Clause 19, Page 105 and Instructions to Offerors, Section 8, Page 14, BPA Price Adjustments	15. Pricing, PWS Clause 19, Page 105 and Instructions to Offerors, Section 8, Page 14, BPA Price Adjustments	
89	The government requires the contractor furnish evidence of insurance prior to performance under the BPA or any order. Please either remove this section or clearly define "service-related capability," and clarify what variety of insurance may be necessary to cover costs related to it. In addition, the government requires that subcontractors fulfilling certain roles retain the type and amount of insurance required for those roles. Please consider removing this subcontractor type and amount of insurance requirement for specific roles as it will limit the population of potential subcontractors, artificially constraining the ability of prime contractors to construct solutions which provide the best value to the government. Prime contractors should have latitude and responsibility to determine the varieties of risk coverage needed from various subcontractors to ensure performance."	Insurance, 18 Special Requirements, Page 105	Insurance, 18 Special Requirements, Page 105	
90	Please consider removing this requirement.	Indemnification, 18 Special Requirements, Page 104, PII/Data breach language.	Indemnification, 18 Special Requirements, Page 104, PII/Data breach language.	
91	Will GSA provide industry with the business case for this BPA, and how complex cloud migration and modernization efforts will be procured given that each pool and subpool will be awarded as separate contracts? Will ordering agencies need to break their requirements to multiple RFPs per subpool?	General	General	