



May 30, 2025

Michael Shepherd
Director
Catalog Management Office (CMO)
Federal Acquisition Service

Dear Mr. Shepherd:

We are writing to express our concerns with respect to a Request for Information (RFI) from the General Services Administration (GSA) Catalog Management Office (CMO), conducting market research on a potential mandatory requirement for contractors to use Global Trade Item Numbers (GTINs) for all commercial-off-the-shelf products listed on their Multiple Award Schedule (MAS) catalog. The GSA CMO is interested in how such a requirement may impact vendors that offer configurable products, or that do not currently assign GTINs at the individual product level. As discussed below, the vast majority of our members (and firms on the MAS) do not use GTINs in the commercial market, and they are unworkable in the content of highly configurable products like furniture or information technology (IT). In addition, if the GSA CMO decides to further proceed with any consideration of imposing a mandatory reporting requirement related to GTIN, we maintain the action should go through the rulemaking process, with an opportunity for public comment, in accordance with the Administrative Procedures Act (APA) and the Paperwork Reduction Act (PRA).

By way of background, the Coalition for Common Sense in Government Procurement (Coalition) is a non-profit association of firms selling commercial services and products to the Federal Government. Our members collectively account for more than \$145 billion of the sales generated through GSA MAS program. Coalition members also are responsible for many of the commercial item solutions purchased annually by the Federal Government. These members include small, medium, and large business concerns. The Coalition is proud to have collaborated with Government officials for 45 years in promoting the mutual goal of common-sense acquisition.

GTINs are globally unique identifiers used to facilitate product identification, standardization, and interoperability across supply chains. Types of GTINs include Universal Product Codes (UPC), European Article Number (EAN), Global Standards 1 (GS1), and ITF (standardized 14-digit barcode that utilizes the “Interleaved 2 of 5” symbology, commonly abbreviated as I2of5 or ITF).



GSA is essentially conducting survey on the use of GTINs through an RFI. Impacted firms, including small businesses, may not have the time or resources to monitor GSA Interact or the System for Award Management to respond to RFIs. As mentioned above, our members are responsible for over \$145 billion in sales on the MAS, and we estimate that less than 10% of firms in the Coalition utilize GTINs. Some of our larger members may sell thousands of items and have GTINs for only a handful of items. Unlike some commercial platforms that focus primarily on retail products, the MAS caters to industries like furniture, IT, and temporary structures, where the products are configurable and there are millions of possible permutations. GTINs are not practicable for these industries. There is also a steep cost associated with assigning GTINs to items. We estimate the cost for a firm with a catalog exceeding 1 million+ items to acquire GTINs to be \$100,000, which would be especially burdensome on small businesses. Requiring firms to spend large amounts of money in order to become or remain a MAS contractor is contrary to the purpose of the MAS, which is to attract commercial firms to the federal market. In addition, on commercial platforms GTINs are optional and it is possible for vendors to sell items without GTINs. Thus, at a minimum GTINs should not be mandatory, but should be optional if available, without any negative consequences or burdens for not having GTINs, such as requiring approvals, reviews or waivers.

This issue is not new. GSA considered making Universal Product Codes (UPCs) mandatory in 2014. The Coalition was concerned then about the burden on industry, as expressed in the attached letter. Many of the concerns expressed in that letter with respect to UPCs apply equally to GTINs. It is our understanding that GSA recently changed its approach to UPCs in the Federal Acquisition Service Catalog Platform (FCP). Specifically, prior to FCP, contractors were required to provide at least one UPC per product Special Item Number awarded on their contracts when uploading GSA Advantage data through SIP/EDI-832. Due to the limited utilization of UPCs commercially, many contractors had to apply for, and be granted, special waivers to this requirement before they could upload their GSA Advantage data. Notably, when GSA unveiled FCP, the UPC data field was no longer a mandatory contractor data requirement. Thus, we question why GSA is again considering a mandatory requirement that is not a commercial practice for most industries on the MAS and that will result in increased costs and administrative burden for vendors, and ultimately the government and taxpayer. This is an example of a possible government action, however well-intentioned, that will increase administrative burdens on government contractors and directly undermines the primary objective of delivering cost-effective and timely service to government customers. Every hour



spent navigating complex compliance requirements, duplicative paperwork, or redundant reporting is an hour not spent solving problems, innovating, or executing the primary mission. These burdens inflate overhead costs, delay project timelines, and discourage participation from agile, high-performing firms—particularly small businesses. The result is a procurement system that is slower, more expensive, and less responsive to the government's needs. Reducing unnecessary administrative obstacles is essential to restoring efficiency, competition, and overall value in government contracting.

Finally, the results of the survey should not be used to make a final decision on such an important matter. As mentioned previously, an RFI is not an accurate barometer of the prevalence of GTINs in the commercial market or among MAS contractors. Because of the potential burden and cost on industry, any decision to make GTINs a mandatory reporting requirement should be done with notice and an opportunity for industry feedback and comment in accordance with the APA (5 USC 551 et seq.) and PRA (44 USC 3501 et seq.).

The Coalition sincerely appreciates the opportunity to provide feedback for improving the efficiency of GSA's MAS program. We would be happy to meet to discuss this issue further. If there are any questions, I may be reached at (202) 331-0975 or rwaldron@thecgp.org.

Sincerely,

Roger Waldron

President

A handwritten signature in blue ink, appearing to be 'RWaldron', with a long horizontal flourish extending to the right.