



October 10, 2025

Federal Acquisition Regulatory Council  
General Services Administration  
Washington, D.C.

Subject: Comments on FAR Part 4 Deviation

Dear FAR Council,

The Coalition for Common Sense in Government Procurement (Coalition) appreciates the opportunity to comment on the General Services Administration's (GSA) Class Deviation concerning Federal Acquisition (FAR) Part 4 (Administrative and Information Matters).

By way of background, the Coalition is a non-profit association of firms selling commercial services and products to the Federal Government. Our members include small, medium and large business concerns which collectively account for more than \$16 billion of the annual sales generated through GSA's Multiple Award Schedule (MAS) program. The Coalition is proud to have collaborated with Government officials for over 45 years in promoting the mutual goal of common-sense acquisition.

The Coalition appreciate the efforts the FAR Council has made to date with respect to the Revolutionary FAR Overhaul (RFO). We understand certain reports are required by statute, and we urge the Administration to work with Congress to repeal two statutory requirements that are burdensome and costly to contractors and provide no real value to the Government. Specifically Service Contract Act Reporting (FAR RFO 4.303) as required by section 743(a) of Division C of the Consolidated Appropriations Act, 2010 (Pub. L. 111-117), and Executive Compensation and First-Tier Subcontract Reporting (FAR RFO 4.306) as required by section 2 of the Federal Funding Accountability and Transparency Act of 2006 (Pub. L. 109-282), as amended by section 6202 of the Government Funding Transparency Act of 2008 (Pub. L. 110-252). Much of the information required by these reports is already in the public domain, the Federal Procurement Data System – Next Generation, or the contract file in the Government's possession. Moreover, large prime contractors already report their subcontracting performance under small business subcontracting plans. These reporting requirements are great examples of burdensome, wasteful, bureaucratic mandates that deter new entrants or drive firms from the federal market.

The Coalition hopes you find these comments useful and thanks you for your time and consideration. If you have any questions, I may be reached at (202) 899-2986 ext. 129 or [kdodds@thecgp.org](mailto:kdodds@thecgp.org).

Regards,

Kenneth Dodds  
Executive Vice President & General Counsel