



October 10, 2025

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

Subject: Comments on FAR Part 8 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 8 (Required Sources of Supplies and Services).

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 strongly supports the FAR Council's Revolutionary FAR Overhaul (RFO) efforts with respect to Part 8, including the decision to move procedures for the GSA MAS out of the FAR and into the GSA Acquisition Regulation. While we agree that the majority of MAS award decisions require only a brief explanation, not a debriefing, the FAR Council should consider whether a debriefing should be required or encouraged for larger service competitions, such as task orders over \$7.5M, consistent with FAR RFO 16.507(c). The Government benefits when industry has a deeper understanding of how a proposal was evaluated, significantly reducing the likelihood of bid protests by providing contractors with clear understanding of evaluation decisions, which translates to fewer delays and reduced costs defending protests. Debriefings also create valuable opportunities for agencies to identify weaknesses in their evaluation methodologies, leading to continuous improvement in source selection procedures and better documentation practices. The transparency demonstrated through debriefings encourages broader contractor participation in future procurements, as businesses are more willing to invest in proposal development when they trust the fairness of the evaluation process. This increased competition ultimately benefits the government through higher quality solutions and potential cost savings. Additionally, the commitment to transparency helps build stronger, more collaborative relationships with the contractor community. From the contractor perspective, debriefings deliver meaningful feedback on proposal strengths and weaknesses, providing valuable insights that can improve future submissions and competitive positioning. This transparency eliminates uncertainty about whether evaluation criteria were properly applied and

helps contractors better understand agency priorities and decision-making processes. By reducing the need for speculative bid protests, contractors save significant resources that would otherwise be spent on unnecessary legal challenges and can instead focus their investments on more promising opportunities. The detailed information provided during debriefings also serves as valuable business development intelligence, informing strategy development and helping contractors tailor their capabilities to better meet government requirements. When properly implemented—with detailed discussions of significant weaknesses, comparative assessment information where appropriate, and meaningful question & answer opportunities—debriefings represent a win-win approach that saves resources, improves acquisition outcomes, and strengthens government-contractor relationships through increased transparency and communication.

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,

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