



August 1, 2025

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

Subject: Comments on FAR Part 11 Deviation and associated guidance

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 and associated guidance concerning Federal Acquisition (FAR) Part 11 (Describing Agency Needs).

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 include small, medium and large business concerns which collectively account for more than \$145 billion of the sales generated through General Services Administration (GSA) Multiple Award Schedule (MAS) program. The Coalition is proud to have collaborated with Government officials for 45 years in promoting the mutual goal of common-sense acquisition.

First, we strongly support the emphasis on commercial products and services. For firms in the copier and printer industry, standardized printer and copier solutions can meet the general needs of most Federal agencies. However, we have some comments with respect to the copier and printer industry for your consideration.

Customization Is Essential	<p>Many multifunction and print production devices require tailored configurations to meet agency-specific security, workflow, and compliance needs.</p> <p>Example: A federal agency may require secure badge-based print release integrated with its identity management system. The base device is commercial, but the configuration is customized.</p> <p>Proposed Solution: Recommend GSA emphasize in guidance that the term “commercial” includes configurable solutions, across all industries and sectors, and encourage agencies to describe needs in terms of outcomes while allowing tailored configurations.</p>
Brand Name or Equal Language Needs Clear Guidance	<p>The use of brand name or equal descriptions may be inconsistently applied or misunderstood.</p> <p>Example: A solicitation may request “enterprise-grade print</p>

	<p>management” without specifying compatibility with existing infrastructure. Without salient characteristics, vendors may be unsure whether their solutions qualify.</p> <p>Proposed Solution: Encourage GSA to issue guidance on using salient characteristics and functional equivalency to ensure fair and consistent evaluation.</p>
Clear, Detailed Performance Descriptions	<p>Agencies may describe needs too generally, leading to inconsistent evaluations or post-award issues.</p> <p>Example: A requirement for “high-speed scanning” without a defined pages-per-minute threshold could result in misalignment.</p> <p>Proposed Solution: Recommend GSA provide sample language or templates that balance performance-based descriptions with measurable criteria.</p>

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.

Regards,

Kenneth Dodds
Executive Vice President & General Counsel