

January 13, 2026

Mr. Greg Rollins  
Assistant Commissioner  
Office of General Supplies and Services  
General Services Administration

Dear Mr. Rollins:

Thank you again for meeting with members of the Coalition for Common Sense in Government Procurement (Coalition) to seek feedback on Transactional Data Reporting (TDR) in the context of firm-fixed price service orders under the General Services Administration's (GSA) Multiple Award Schedule (MAS).

In response to your request to provide written feedback confirming comments from industry, we reached out to the attendees to share their thoughts on TDR with respect to services. Attached, you will find their anonymized comments.

Requiring contractors to determine and then disclose hourly rates for firm-fixed price contracts is inconsistent with commercial practice and commercial item contracting under the Revolutionary FAR Overhaul. Such a requirement would essentially retroactively convert these orders into cost reimbursement contracts, which is completely at odds with the current Administration's efforts to increase firm fixed price contracting, which places the risk of performance on the contractor.

Among the primary member responses are the following:

- Requiring a labor category prices paid cost breakdown for all labor categories defeats the purpose of firm fixed price contracting. To breakdown these contracts would create an undue burden on industry due to the limitless variation in scope, schedule, budget, resources, location, etc. These variations would limit GSA's ability to meaningfully utilize the data in fair market pricing assessments.
- To minimize the reporting burden of TDR, GSA should use existing data provided by participating firms, including information provided in other systems before creating new data elements. Additional requirements will increase industry costs which will lead to higher prices for customer agencies.
- Reporting hourly rates for firm fixed price contracts are inconsistent with government approved accounting systems. Government-approved accounting systems are unable to account for labor rates with firm-fixed price orders. If GSA were to impose this requirement on MAS contractors, it would establish a precedent for other agencies that is inconsistent with commercial business practices.

We understand the need to come up with a workable framework for TDR with respect to services. If market research is the goal, providing statements of works/objectives might be a workable solution, but there needs to be a threshold, e.g., above \$5 million, which will reduce the burden on industry

while providing meaningful market research to the government for larger purchases, Please feel free to reach out to me to discuss the attached and opportunities for future dialog with members. We look forward to collaborating on a workable solution for GSA and industry.

Sincerely,

Roger Waldron, President

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

## **Member Comments**

- The FFP New MAS Requirement from slide 8
  - As the Coalition noted in its original comments for TDR in 2014, the first step for collecting data should always be a preference for using data that is already in the Government's possession. Instead of creating a new data element, GSA could instead mandate eBuy usage for services orders exceeding \$1M and then GSA would have a copy of the SOW, PWS, etc. without imposing an additional burden on industry. It should be noted that OASIS+ requires use of eBuy so this requirement should not be surprising or unusual to current customers.
- FFP MAS New Requirement Alternative from slide 8
  - This suggestion is based on a false premise that cost breakdowns are available for FFP projects. This proposal does not reflect commercial practices (including that some providers do not track employee hours on FFP projects) and is not appropriate for a commercial contracting program like MAS.
  - Additionally, this proposal creates a de facto labor qualification requirement for firm fixed price orders (mapping to labor categories with qualifications where the task order did not impose such a requirement). Agreeing to this proposal would significantly increase compliance costs and risks for participating companies.

### ***Re: Collection of TDR data for FFP contracts –***

- Breaking FFP engagements to a lower level of detail, price/hours for reporting would be a burden that industry could/would not maintain. For FFP professional services contracts, there are virtually unlimited variations—such as scope, schedule, budget, resources, location, and security classification, etc.—that make standardized reporting challenging and less useful for GSA's category management and fair pricing assessments.
- If the issue is scope, GSA should utilize SINS to determine a common scope or published data in FPDS, or other government system. Requiring Industry to add descriptions of work that is not what their systems are designed for would be a burden.

**Re: Changes in Contract Management –**

- Increasing TDR reporting components will place an additional burden on contractor resources and systems and increase costs for manpower and systems enhancements.
- Changing requirements will increase industry expenses and eventually a higher price for the clients.
- It also makes the vehicle unattractive for industry and will be a barrier for vendors to participate in. Additionally it would be burdensome for small businesses.

**Reasons why the labor category prices breakdown should not be required on FFP Task Orders/CLINs**

1. No ability to capture/enter hourly rates on a FFP CLIN in government approved accounting systems.
2. The request for labor category hours/pricing under FFP is flawed. Hours are fluid in any given month. How would hourly rates be derived? This wouldn't produce relevant information nor be an appropriate indicator.

Example -

- Three-month effort – FFP CLIN awarded for \$90,000
- Monthly billing of \$30k was agreed to for the outcome-based deliverable
  - Month 1 invoice value = \$30k / 300 hours logged
  - Month 2 invoice value = \$30k / 125 hours logged
  - Month 3 invoice value = \$30k / 175 hours logged

3. This practice will set a precedent to be applied to all other non-GSA MAS FFP contracts/task orders.
4. This is not a practice nor requirement in the commercial marketplace for FFP contracts.
5. The government is layering burden back on the contractor for information that is not readily available nor required.