



July 23, 2026

Federal Acquisition Regulatory Council
Washington, D.C.

Via Federal eRulemaking Portal: <https://www.regulations.gov>

Subject: Comments on FAR Parts 7 (FAR Case 2026-002), 91 FR 37636

The Coalition for Common Sense in Government Procurement (Coalition) appreciates the opportunity to comment on the Federal Acquisition Regulatory Council's proposed rule with respect to Federal Acquisition Regulation (FAR) Part 7 (Acquisition Planning).

By way of background, the Coalition is a non-profit association of firms selling commercial products and services to the Federal Government. In Fiscal Year 2025, its members collectively delivered over \$170 billion in goods and services to the Federal Government. These members include small, medium, and large business concerns. The Coalition is proud to have collaborated with Government officials for more than 45 years promoting the mutual goal of common-sense acquisition.

Coalition members recognize that the FAR Council does not want to list specific market research considerations or techniques that must be used. However, contracting officers are currently focusing on "price" without considering all of the factors that influenced that price, e.g., terms and conditions, date, country of origin, delivery, quantity, shortages, tariffs, recalls, discontinuations, allocation limits, shelf-life constraints, package-size availability, manufacturer authorization and support, supplier status, lead times, anticipated demand, applicable regulatory requirements, etc. Given the dynamic nature of supply chains, market research may require more recent confirmation, validation, or updating when material market conditions change between the time information is collected and the time of solicitation issuance or award. Market research that ignores the totality of circumstances driving price undermines access to the commercial market, reduces competition, and ultimately leads to higher costs for customer agencies.

The Coalition recommends that the FAR Council provide additional acquisition planning guidance regarding pricing research to ensure that contracting officers are conducting holistic, sound market research. Most importantly, this additional guidance also will supplement FAR part 15 and assist contracting officers in making sound, balanced, and market-driven fair and reasonable price determinations. Too often contractors and offerors are being held to "vacuum"

government pricing references/standards that fail to consider and adjust for differing terms, conditions, and circumstances.

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) 315-1053 or rwaldron@thecgp.org.

Regards,

A handwritten signature in black ink, appearing to read 'RWaldron', is written over a light gray rectangular background.

Roger Waldron
President