



September 18, 2026

Ryan Lambert
Associate Administrator
Office of Government Contracting and Business Development
U.S. Small Business Administration
409 Third Street, SW
Washington, DC 20416
www.regulations.gov

Subject: SBA Size Standards and Size Standards Methodology

Dear Mr. Lambert:

The Coalition for Common Sense in Government Procurement (Coalition) respectfully requests that the Small Business Administration (SBA) extend the comment period for the proposed size standards rule (91 FR 53741, RIN 3245-AI67, Docket No. SBA-2026-0199) and the proposed size standards methodology (91 FR 54096, Docket No. SBA-2026-0265).

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.

The changes proposed represent the largest restructuring of small business size standards in decades. The changes would have a transformational impact across the \$750 billion Federal procurement marketplace. SBA has not provided sufficient analysis of the potential impacts of these proposed rules on this crucial marketplace. A host of federal buying policies, including the rule of two, agency contracting goals, and the Mentor Protégé program will be impacted by the changes. With this in mind, it is essential that the SBA garner as fulsome and complete feedback from industry as possible. Our members are currently working to bolster their responses to the requests for comments. We request that SBA provide additional time to ensure that industry can address the wide range of impacts these proposed rules will have.

We commend SBA for holding a public forum earlier this week and urge SBA to consider extending the comment period for these two proposed rules. Thank you for your time and consideration. If you have any questions, I may be reached at rwaldron@thecgp.org.

Regards,

A handwritten signature in black ink, appearing to read 'Roger Waldron', with a long horizontal flourish extending to the right.

Roger Waldron
President

Cc: ryan.lambert@sba.gov