



November 17, 2017

Chanda R. Brooks
Contracting Officer
Department of Defense
1225 South Clark Street, Suite 1202
Arlington, VA 22202-4371

Subject: DoD Cloud: Request for Information

Dear Ms. Brooks,

I am writing on behalf of members of the Coalition for Government Procurement ("the Coalition") in response to the Department of Defense ("DoD") Cloud Executive Steering Group's ("CESG") Request for Information ("RFI") regarding the enterprise cloud acquisition.

The Coalition is a non-profit association of firms selling commercial services and products to the Federal Government. Our members collectively account for a significant percentage of the sales generated through the General Services Administration's ("GSA") contracts including the Multiple Award Schedule ("MAS") program. Coalition members are also responsible for many of the commercial item solutions purchased annually by the Federal Government. Coalition members include small, medium, and large business concerns. The Coalition is proud to have worked with Government officials for more than 35 years towards the mutual goal of common sense acquisition.

The Coalition strongly supports DoD's focus on commercial solutions to meet its cloud requirements. As currently constructed, however, the RFI raises serious concerns related to its potential impact on the Federal marketplace for cloud services. Specifically, the Coalition is concerned that the RFI appears to be directed towards a single provider result. As a purchaser, DoD is unique, unlike not only a typical commercial customer, but also other Federal agencies, as its needs are mission-focused, diverse, and dynamic across its services and numerous agency components. Thus, recognizing the distinctive character of the DoD purchaser, the Coalition believes that the RFI's approach should be modified to accommodate the potential for multiple cloud services providers for the DoD market.

A multiple award IDIQ approach that offers diversified solutions from the commercial market will facilitate a culture of experimentation, adaption, and risk-taking, and it will increase the speed of technology development and procurement, as envisioned by the recent cloud acceleration memorandum issued by Deputy Secretary of Defense Patrick Shanahan. In contrast, a single

award DoD Enterprise Cloud Acquisition contract would lock-in DoD to a single cloud approach, and, by so doing, give rise to performance and national security risks.

Further, the Coalition is concerned that, as currently constructed, the RFI appears to be leaning toward prioritizing the needs of commercial suppliers above those of the Federal customer. Specifically, the RFI asks industry to comment on what policies and federal regulations serve as barriers to the proposed cloud services solution and states that, “DoD is prepared to pursue the revision of existing policies and federal regulations to remove barriers to success.” This approach, which runs counter to the conventional notion that sellers should attempt to meet the critical needs of its customers, raises questions concerning how the Department’s needs will be factored in to the decision “to pursue the revision of existing policies and federal regulations.” In addition, it raises serious concerns regarding its potential fragmentation of the Federal procurement process into multiple, product-centric processes. Consequently, the Coalition believes that DoD should modify this assessment to include an in-depth analysis of all identified recommended revisions as it relates to their potential for being applied more broadly to IT services in general, rather than one specific solution.

In addition, the Coalition is concerned with the RFI’s apparent preference for cloud service providers that support third parties, as well its apparent lack of significant input from the intelligence community. Without any details regarding the relevance of this third-party support or any solicited input from the third-parties, this approach prompts additional concerns that the RFI’s focus is on a single cloud supplier. At a minimum, the RFI should seek more specific feedback regarding, not only the experiences of the cloud service provider offering support of third-parties, but the experiences of those third-parties, as well. Further, given the intent to address needs in the classified space, it would be helpful to secure the input of intelligence community customers on their experiences with these services and with their cloud environment. Specifically, it would be useful to understand whether cloud lock-in exists in the intelligence community; whether “technical parity with commercial cloud” is robust enough and otherwise suitable for their activities; and whether that community has faced any challenges in the cloud space overall.

The Coalition appreciates the DoD Cloud Executive Steering Group (CESG) for its outreach to industry and its efforts to accelerate the adoption of a modern enterprise cloud services solution through the commercial marketplace. We urge the CESG to ensure that the future DoD Enterprise Cloud Acquisition is open to multiple solutions in the interest of our national security and to incentivize cloud innovation moving forward under the new contract. If there are any questions, please contact me at (202) 331-0975 or rwaldron@thecgp.org.

Sincerely,

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

Roger Waldron
President