



March 14, 2018

Chandra Brooks  
Contracting Officer  
Department of Defense  
1225 South Clark Street, Suite 1202  
Arlington, VA 22202

Subject: Request for Extension on JEDI Draft RFP

Dear Ms. Brooks,

The Coalition for Government Procurement (the Coalition) appreciates the Department of Defense (DoD) for its outreach to industry on its Joint Enterprise Defense Infrastructure (JEDI) Cloud procurement. Based on a number of procedural questions, and because it represents a potential multi-billion-dollar contract, we respectfully request an extension for the presolicitation notice HQ0034-18-R-0077 seeking feedback from industry on the JEDI Cloud Draft Request for Proposal (RFP).

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 JEDI Cloud Draft RFP reflects a single-award IDIQ approach to execute a contract for up to 10 years for potentially billions of dollars in IT infrastructure services across the DoD. Given the size and complexity of the procurement, and the lack of specificity in the Draft RFP, the Coalition respectfully requests that DoD pause to update the Draft RFP. We also ask that an updated version of the Draft RFP provide for multiple awards. 10 USC 2304a, which provides defense agencies the authority to award single or multiple task or delivery contracts, specifically states that, in implementing this authority, regulations must, "establish a *preference for awarding, to the maximum extent practicable, multiple task or delivery order contracts...* and establish criteria for determining when award of multiple task or delivery order contracts would not be in the best interest of the Federal Government." Thus far, there is nothing to indicate that this process was followed or any rationale for the approach articulated. A single award approach is asynchronous to normal commercial/organizational buying practice and prompts questions about the risk to national security. Moreover, given the nature of cloud technology innovation and its rapid evolution, a virtually monopolistic award of such a long

duration risks locking-up the government market for cloud services. Ironically, rather than expediting access to innovative technology, reduced competition ultimately will impede the Government's access to that technology.

For these reasons, the Coalition respectfully requests that the Department:

1. Extend the deadline for comments in response to the JEDI Draft RFP at a minimum to April 23, 2018. In addition, given the complexity of the procurement and that, at the industry day, the Department described the Draft RFP as incomplete, the Department should utilize multiple draft RFPs be published, consistent with 2.1.2.3 of the DoD Source Selection Procedures<sup>1</sup>, which states that the "use of one of more draft RFPs is highly recommended, and the issuance of multiple draft RFPs for Industry comment should be considered, depending on the complexity of the acquisition."
2. Update the RFP to include more specifics regarding the scope presented in the Statement of Objectives (SOO), cloud performance metrics, the evaluation process, and the evaluation criteria.
3. Revise the award methodology to provide for multiple awards (in alignment with the statutory and regulatory preference for multiple award versus single award IDIQs).
4. Clarify Section M evaluation criteria to show how trade-off evaluations of proposals will be made, including metrics, and what factors need to be emphasized by vendors in constructing proposal responses.

The extension to the Draft RFP will give an industry adequate opportunity to provide comprehensive input on the benefits and potential unintended consequences of the draft solicitation, and to also provide specific recommendations that would allow companies to compete in response to the Final RFP on an intelligent basis.

The Coalition sincerely appreciates your consideration of the extension request. If there are any questions, please contact me at (202) 315-1051 or [rwaldron@thecgp.org](mailto:rwaldron@thecgp.org).

Sincerely,



Roger Waldron  
President

---

<sup>1</sup> Department of Defense Source Selection Procedures, Defense Federal Acquisition Regulation Supplement: Procedures, Guidance and Information, Subpart 215.3—Source Selection, March 31, 2016.