



Sonny Hashmi
Commissioner, Federal Acquisition Service
General Services Administration
1800 F Street NW
Washington, DC 20405

March 6, 2023

Dear Mr. Hashmi,

The Coalition for Government Procurement (the Coalition) is a national non-profit association of companies selling commercial services and products to the Federal Government. Our members, which include small, medium, and large business concerns, account for more than 145 billion dollars of the sales generated annually through government contracts. You can understand, then, why they have a significant interest in the use and expansion of Transactional Data Reporting (TDR) across the GSA contracting ecosystem. The purpose of this letter is to understand GSA's position on the status of TDR and when the agency plans to expand its use as an option across its contracts.

Unlike static data measures obtained and evaluated at a particular point in time, TDR focuses on transactions at the order level, and, as a result, yields for all stakeholders (GSA, customer agencies, and contractors) the most relevant, actionable data supporting purchases. Under TDR, in addition to contract identifier information, contractors must provide a description of deliverables, like part numbers and units delivered, the quantity of items sold, unit prices, and the total price paid. Under the current TDR pilot, this data is reported in lieu of the reporting of Commercial Sales Practices (CSP), the establishment of Most Favored Customer (MFC) commercial pricing and Basis of Award (BOA) customer benchmarks and pricing, tracking and aligning BOA/MFC pricing with prices given to GSA, and compliance with the Price Reductions Clause based on that tracking, where a price reduction for GSA could be triggered when BOA/MFC pricing and GSA prices are out of an agreed-to alignment. Net-net: TDR provides timely, relevant data reflecting dynamic changes in the Federal market, while the CSP/BOA/MFC framework is much less timely and relevant to the Federal market.

Under TDR, the Government receives important market intelligence about how products are being used by customer agencies, and if the market changes, how those changes affect product availability and pricing. In addition, TDR reduces added administrative time and cost, which helps small businesses in the government market because it eliminates the need for the development of costly regimes to facilitate BOA/MFC benchmark compliance. In doing so, it helps facilitate the Administration's goal of increasing procurement spending with small businesses.



GSA's Senior Procurement Executive, Office of Government-wide Policy, Jeff Koses has pointed to the benefits of TDR, noting that:

Since FY 19, performance on all nine evaluation metrics was maintained or showed improvement. Most importantly:

- For three years in a row, contract-level pricing was better when TDR was used than it was when under Most Favored Customer (MFC) Pricing.
- Small businesses participating with TDR generate much stronger sales growth than small businesses under the MFC pricing.
- The data is now 98 percent complete making it even more actionable; and
- Contracting officer usage of transactional data is improving, but there is more opportunity here to improve.

So too, you reportedly have [recognized](#) that

The future of how we buy in government is going to require real time data, and the price reduction clause, which served a particular purpose a decade ago, two decades ago, isn't good enough.

We agree, which is why we seek an understanding of the status of TDR at GSA and when it will be expanded as an option for use across the MAS program. In this regard, we also are interested in the associated training of the workforce on TDR. If you would like to address this matter directly with industry, we would be happy to facilitate such an engagement. Please feel free to reach out to me at rwaldron@thecgp.org or 202 315-1051.

Thank you, in advance, for your time and attention to this important issue. Your engagement is very much appreciated.

Sincerely,

Roger D. Waldron