



DEC 21 2005

at Desk for

MEMORANDUM FOR DAVID CAPITANO
DIRECTOR
DEFENSE ACQUISITION REGULATIONS COUNCIL

FROM: RALPH DESTEFANO, DIRECTOR
REGULATORY AND FEDERAL ASSISTANCE
DIVISION

SUBJECT: FAR Case 2005-007, Central Contractor Registration -Taxpayer
Identification Number (TIN) Validation

Attached is a comment received on the subject FAR case published at 70 FR 60782;
October 19, 2005. The comment closing date was December 19, 2005.

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2005-007-1	12/19/05	12/19/05	Associated Builders & Contractors, Inc.
2005-007-2	12/21/05	10/17/05	GSA/OCAO

Attachments

2005-007-1



"John Strock"
<Strock@abc.org>
12/19/2005 04:52 PM

To farcase.2005-007@gsa.gov
cc
bcc
Subject Comment on Proposed Rule FAR Case 2005-007

December 19, 2005

Laurieann Duarte
General Services Administration
Regulatory Secretariat [VR]
1800 F Street, NW, Room 4035
Washington, DC 20405

Re: Federal Acquisition Regulation Case 2005-007: Central Contractor Registration – Taxpayer Identification Number (TIN) Validation

Dear Ms. Duarte:

Associated Builders and Contractors, Inc. (ABC), a national trade association representing over 23,000 construction contractors, subcontractors, suppliers, and related firms, appreciates this opportunity to comment on the proposed rule, Federal Acquisition Regulation Case 2005-007: Central Contractor Registration – Taxpayer Identification Number Validation.

ABC suggests that the General Services Administration include a mechanism to be used in the event that an employer is unable to receive validation for its taxpayer identification number (TIN) during the Central Contractor Registration (CCR) process. A conditional registration may be in order until the contractor in concert with the GSA and IRS can determine the error. If a contractor is unable to obtain the TIN validation, a process for resolving the matter should be laid out for them online. A conditional registration should be allowed for participation in a bid so long as the contractor can show the TIN was valid at the time it applied for registration. Due to potential delays involving the interaction of two computer major agency systems, it seems reasonable that some safeguard should be in place for contractors, especially first time registrants that are likely to be smaller firms. ABC asks that this issue be addressed by the Administration in its final rulemaking.

Thank you for your time and consideration.

Sincerely,
John Strock

John Strock

Policy Manager
Associated Builders & Contractors, Inc.
(ph) 703-812-2037
(fax) 703-812-8202
jstroock@abc.org

2005-007-2



Margaret D. Neary/VSS/CO/GSA/GOV
10/17/2005 03:51 PM

To Michael O. Jackson/VPC/CO/GSA/GOV@GSA
Laurieann Duarte/VIR/CO/GSA/GOV@GSA,
cc linda.hornsby@gsa.gov, Lois R. Battersby/VS/CO/GSA/GOV, Rodney P.
bcc
Subject Fw: Federal Register Publication - FAR proposed rule 05-007, CCR - TIN Validation

Michael:

Per our conversation this afternoon concerning the FAR Proposed Rule 2005-007, Linda and I suggest that the wording of the following be amended:

CCR) registrant's taxpayer identification number with the Internal Revenue Service to improve data accuracy in the Federal procurement system

The suggested verbiage for this section should read:

CCR) registrant's taxpayer identification number with the Internal Revenue Service to improve the quality of data in both the CCR and the Federal Procurement Data System-Next Generation (FPDS-NG)

Thanks
Linda and Dian

Margaret Dian Neary
Office of the Chief Acquisition Officer
GSA FPDS-NG Coordinator

----- Forwarded by Margaret D. Neary/VSS/CO/GSA/GOV on 10/17/2005 03:40 PM -----



Teresa D. Sorrenti/VS/CO/GSA/GOV
10/17/2005 12:04 PM

&IAE Team, Gayle L. Messick/VSS/CO/GSA/GOV@GSA,
James D. Adams/VSS/CO/GSA/GOV, Lois R. Battersby/VS/CO/GSA/GOV@GSA, Charles T. Bowie/VSS/CO/GSA/GOV@GSA, Karl F. Hebenstreit Jr./VSS/CO/GSA/GOV@GSA, Margaret D. Neary/VSS/CO/GSA/GOV@GSA, Judy A. Steele/VSS/CO/GSA/GOV@GSA, Gladys Poindexter/VSS/CO/GSA/GOV@GSA, John K. Cochran/VSS/CO/GSA/GOV, Robert T. Maslyn/VSS/CO/GSA/GOV
To
cc
Subject Fw: Federal Register Publication - FAR proposed rule 05-007, CCR - TIN Validation

----- Forwarded by Teresa D. Sorrenti/VS/CO/GSA/GOV on 10/17/2005 12:02 PM -----



Laurie A. Duarte/MVR/CO/GSA/GOV
Sent by: Laurieann Duarte
10/17/2005 09:37 AM

To
cc
Subject Federal Register Publication - FAR proposed rule 05-007, CCR - TIN Validation