

Swimmo@aol.com
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To: David C. Childs A-76comments/OMB/EOP@EOP
cc:
Subject: Comments on OMB's Performance of Commercial Activities

You missed the most important point in revising Circular A-76. Your revision must require "humans" to act and not federal agencies. The point is that the "Inventory Requirements" in Attachment "A" must apply to pertinent federal supervisors within an agency.

Attachment "A" must be rewritten. Reword paragraph A1 to read:

*1. **Agencies and Immediate Supervisors.** Immediate supervisors within agencies shall, on an annual basis, inventory activities performed by their employees as being either commercial or inherently governmental. The written inventory shall be personally certified and declared as accurate by the pertinent supervisor(s). Commercial activities may be found within larger organizations that perform inherently governmental or classified work.*

Performance mandate must be directed toward federal supervisors for an accountability standpoint. Without accountability, certification, and final declaration by supervisors, your revision to Circular A-76 will not come to fruition.

I personally support the needed revision. Good luck.

Ronald L. Berry
Taxpayer*
Berry Family*
422 Kingsley, Liberty MO 64068
816-781-0455
swimmo@aol.com