## "Domsch, Ron" <rdomsch@mjharden.com> 12/18/2002 03:02:09 PM

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To: David C. Childs A-76comments/OMB/EOP@EOP

cc: Subject: In Support of the Revision of OMB Circular A-76

"Geospatial activities" such as surveying, mapping, charting, geodesy, image acquisition, and geospatial information acquisition and production are all commercial activities. We strongly believe that these activities should be performed by the private sector.

We urge a clarification in the Circular that any public-private standard competitions under A-76 for architecture, engineering, surveying and mapping services be in compliance with the Brooks Act's qualifications based

selection (QBS) process, as required in 40 United State Code, section 541-544 and part 36 of the Federal Acquisition Regulation (FAR).

We particularly support the provisions that eliminate unfair competition under Agency-to-Agency arrangements. We strongly support the provisions in the Circular that eliminate the current practice that permits agencies to do work for other Federal agencies, and particularly for state and local government.

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