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To: David C. Childs A-76comments/OMB/EOP@EOP
cc:
Subject: Performance of Commercial Activities -- Comments

17 December 2002

Ms. Angela Styles
Administrator
Office of Federal Procurement Policy
Eisenhower Executive Office Building
Room 352
Washington, D.C 20503

RE: Performance of Commercial Activities

Dear Ms. Styles:

These comments are provided in response to the proposed A-76 revisions:

1. We support the A-76 revisions, as it will open up jobs to all Americans and provide many new opportunities for small businesses. Workers will have new opportunities to seek work previously unavailable and it will help eliminate unfair government competition.
2. We particularly support the presumption that all activities are "presumed to be commercial" as this reinforces and supports the long-standing policy of both Democrat and Republican Administration to rely on the private sector for goods and services.
3. The revisions state that a "standard competition shall not exceed 12 months." We strongly support this move to make the time frames for conducting competitions more reasonable and consistent with other procurements.
4. The commercial activities panel astutely recognized the established mechanism exists to ensure high value service. Use of a FAR based best value process will ensure the government obtains the best value for the buck.
5. We support the provisions that eliminate unfair competition under agency-to-agency arrangements. This also would eliminate a loophole that has allowed the circumventing of Congress's right and responsibilities to appropriate funds.
6. We believe a greater reliance on standardized PWS and QASP would eliminate emotional issues in the development of those documents. It is only human nature to be reluctant to develop a document that may put you out of work particularly when not eligible for right of first refusal rights.
7. I am currently working on a government contract that allows government sites the opportunity to make important improvements to the real property for which they have responsibility. Prior to this contract, for various reasons, these improvements often didn't get made.
8. Finally, I have worked for the government most of my life in some capacity and as a contractor employee, the continued opportunity for employment is very important to my family and me.

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A-76 Revisions(chugach).d