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To: David C. Childs A-76comments/OMB/EOP@EOP
cc: Donald R Kisicki <Donald.R.Kisicki@hq02.usace.army.mil>
Subject: comment

I am sending this comment on behalf of Claudia Tornblom, the Deputy Assistant Secretary of the Army for Management and Budget. I believe that she sent this comment on December 19, and I know that was her intention, but I do not have a record of the comment and she is ill today. Please consider this comment. Thank you. Mark Mugler

Attachment D, paragraph A, first and second sentences. Modify "Customer agencies shall compete all Commercial ISSAs exceeding \$1 million annually. ISSAs are not subject to competition if: (1) the revenue generated by the reimbursable rate does not exceed \$1 million annually, ..." to read "Customer agencies shall compete all Commercial ISSAs requiring more than 10 FTEs annually. ISSAs are not subject to competition if: (1) they require 10 FTEs or less annually... ". This makes the criteria the same as that for direct conversion in Attachment C, removes the ambiguity of whether the reimbursable rate applies to in-house costs or in-house and contract costs and eliminates the need to consider future inflation adjustments.