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

Crown Management Services, Inc. supports the A-76 revision as it will open up jobs to all Americans, including small businesses such as Crown. Entrepreneurs and workers will have new opportunities to seek work previously unavailable to the private sector and it will help eliminate unfair government competition.

We particularly support the presumption that all activities are "presumed to be commercial" as this reinforces and supports the longstanding policy of both Democrat and Republican Administrations to rely on the private sector for goods and services.

The revisions state that a "standard competition shall not exceed 12 months." We strongly support this move to make the time frames for conducting public-private competitions more reasonable, and in line with standard procurements.

The report of the Commercial Activities Panel noted that the government already has an established mechanism to ensure high value service -- that is the procurement process of the Federal Acquisition Regulation (FAR.), a system all private sector contractors compete under daily. The panel specifically recommended conducting public-private competitions using the FAR. Acting upon that recommendation, the November 2002 Circular A-76 revisions would establish a FAR based process, based on best value, for certain procurements.

We support the provisions that eliminate Unfair Competition under Agency-to-Agency arrangements. These provisions would eliminate the current practice that permits agencies to do work for other Federal agencies, and for state and local government.

The ability for all parties to compete on a fair and level playing field is the ultimate measure of a successful A-76 process. We believe the revisions to Circular A-76 will do just that.

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