



FEB 13 2003

GSA Office of Governmentwide Policy

MEMORANDUM FOR LAURA SMITH  
DIRECTOR  
ACQUISITION POLICY DIVISION

FROM: RODNEY P. LANTIER, DIRECTOR   
REGULATORY AND FEDERAL ASSISTANCE  
PUBLICATIONS DIVISION

SUBJECT: GSAR Case 2002-G501, FEDBizOpps Notice on Charging for  
E-mail Notification Service

Attached are comments received on the subject FAR case published at 68 FR 1358;  
January 9, 2003.

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-G501-1	1/16/03	1/16/03	Gerry Baker
2002-G501-2	1/17/03	1/17/03	Tricia R. Iveson
2002-G501-3	1/28/03	1/28/03	Catherine S. Stewart
2002-G501-4	1/29/03	1/29/03	Becky Roberts
2002-G501-5	2/06/03	2/06/03	DoD/Navy
2002-G501-6	2/10/03	2/10/03	NASA

Attachments

GSAR-2002-G501-1



"Gerry Baker"  
<gerry.baker@iogcc.state.ok.us>

01/16/2003 11:23 AM

To: gsarcase.2002-g501@gsa.gov  
cc: "Christine Hansen" <c.hansen@iogcc.state.ok.us>, "Carolyn Goodwin" <carolyn.goodwin@iogcc.state.ok.us>  
Subject: GSAR case 2002-G501

General Services Administration

Regulatory Secretariat (MVA)

1800 F. St. NW, Room 4035

Washington, D.C. 20402

On behalf of the 30 member states of the Interstate Oil and Gas Compact Commission (IOGCC) and the 501(c)3 organization Energy Education Partnership, Inc, we suggest the General Services Administration (GSA) consider exempting government and non-profit entities from the proposed fee requirement. While we understand that the proposed fee would only apply to the public who elect to register for options 2 or 3 of the FedBizOpps Vendor Notification Service, we oppose fees that create barriers to opportunities of interest to government organizations and non-profit entities seeking to serve as vendors to federal government.

Per your request to hear from small entities, both the IOGCC, with fewer than 20 employees, and EEPI, with no staff, qualify. We hope you take the concerns non-federal government agencies and non-profit entities in mind when you consider the final rule.

Please let me know if you have any questions.

Gerry Baker

Associate Executive Director

(405) 525-3556, ext. 112



"Iveson, Tricia R."  
<PATRICIA.R.IVESON  
@saic.com>

01/17/2003 10:41 AM

To: "gsarcase.2002-g501@gsa.gov" <gsarcase.2002-g501@gsa.gov>  
cc:  
Subject: GSAR case 2002-G501

GSAR-2002-  
G501-2

Dear sir or madam,

I am writing to protest GSA's proposal to charge a fee for FedBizOpps e-mail notifications (GSAR case 2002-G501).

GSA, like all government agencies, is in the business of providing services to its stakeholders. In this case, stakeholders will be unduly burdened if forced to come to FedBizOpps site to search for information on a daily basis. If the Internet age has taught us anything, it's that informational transactions such as that provided by FedBizOpps are at their highest when the information is proactively served up to stakeholders. Without such a feature, usage of the service will drop dramatically as users check the site sporadically as time permits.

Of course, the issue here is whether to charge users for the feature. As in any transactional situation, users will opt out of the fee-based service when they can get the information they want elsewhere for free. But, as stated above, the users may enter into such a decision with the intent to truly make an effort to get the information they need, only to find they get that information occasionally. Agencies like GSA are measured on their performance, and in the case of FedBizOpps, successful performance of this application can be measured by the number of informational transactions executed. If a fee is charged, undoubtedly a large number of users would abandon the service. The result is that FedBizOpps will not perform at the same level as it would without the fee.

We all see the Internet as facilitating new levels of transparency to government information, thereby increasing the value of government to its constituencies. Proposed fees such as this only serve to negate the increases in touchpoints between government and constituent. Informational transactions effectually drop back to the levels of that experienced by CBDNet. Why even bother, then, with e-government?

I urge GSA to abandon its proposed plan to institute this fee.

Regards,  
Tricia Reneau Iveson  
Director of Business Development

**Science Applications International Corporation**  
7990 Science Applications Ct.  
M/S CV-47  
Vienna, VA 22183-7000

703.676.1230  
703.676.1314 fax  
703.867.8247 mobile

[ivesonp@saic.com](mailto:ivesonp@saic.com)

2002-G501-3



**"Cathy S Stewart"**  
**<cstewart1@bop.gov>**  
01/28/2003 10:26 AM

To: gsarcase.2002-g501@gsa.gov  
cc:  
Subject: GSAR Case 2002-G501, Fedbizopps Notice on Charging for E-mail  
Notification Service

The case published in the Federal Register on January 9, states that the fees will begin on October 1, 2003 but then refers to anticipated fees for FY 2003. Should this read FY 2004? Please clarify. Thank you.

Catherine S. Stewart, Contract Specialist  
Federal Bureau of Prisons  
National Contracts and Policy Section  
202-307-0985  
cstewart1@bop.gov

2002-9501-4



"Becky Roberts"  
<broberts@catoctin.com>

To: gsarcase.2002-g501@gsa.gov  
cc:  
Subject: Comments on proposed rule re. fee for FedBizOpps

01/29/2003 11:16 PM  
Please respond to  
broberts

As a subscriber to FedBizOpps I have several thoughts on the prospect of paying a fee for the service.

1. Since the requirements posted are Federal requirements, I see the posting as inherently governmental and like the idea of it being a Federal service. There are many commercial services that can point you to FedBizOpps, but I like going to the source.

2. I feel that I pay a penalty for using FedBizOpps in that the selection criteria are very general and I receive many announcements that are not of interest. I'm also certain that I miss some that are of interest. I do not feel that it is appropriate to pay for the service as it is now structured.

3. If the service were improved to provide more targeted selection criteria so I only got what I wanted, I would be more receptive to paying a fee for the service.

Thank you for the opportunity to provide input. If you have any questions about my comments, feel free to contact me.

Becky Roberts  
Certified Professional Facilitator  
Catoctin Consulting, LLC  
Voice: 540-882-3593; mobile: 703-472-3313; fax: 540-882-3597  
www.catoctin.com  
devoted to improving organizational performance



DEPARTMENT OF THE NAVY  
OFFICE OF NAVAL RESEARCH  
800 NORTH QUINCY STREET  
ARLINGTON, VA 22217-5660

2002-G501-5

IN REPLY REFER TO

6 Feb 2003

Mr. Edward Loeb  
General Services Administration  
Regulatory Secretariat (MVA)  
1800 F Street, NW., Room 4035  
Washington, DC 20405

Dear Mr. Loeb:

This is in response to General Services Administration's (GSA) notice posted in the Federal Register, Vol. 68, No. 6, dated January 9, 2003, Proposed Rule, GSAR Case 2002-G501, entitled "FedBizOpps Notice on Charging for E-mail Notification Service." The Office of Naval Research (ONR) takes exception to the rule proposed by GSA relative to 'charging a fee' for certain services currently being offered for free under FedBizOpps. ONR would like to offer the following comments for consideration prior codifying this notice as a final rule:

-Impact to Government Entities: The proposed charge for obtaining categories of solicitations will likely limit competition and harm small business. While the fee is minimal per user, the Government greatly benefits by maximizing competition. Any effort to restrict distribution of solicitations is inappropriate and benefits GSA while harming the rest of Government. ONR and other Government entities already pay to advertise solicitations in FedBizOpps. The fees paid by ONR and other Agencies should be sufficient to cover GSA costs for FedBizOpps. If not, it would be better to raise agency fees than to take an action that could ultimately reduce competition.

Thank you very much for the opportunity to comment. If you have any questions, please contact the cognizant Procurement Analyst, Ms. Brenda Pickett at (703) 696-2607.

Sincerely,

CHARLES R. PAOLETTI  
Executive Director for Acquisition Management  
Acquisition Department

National Aeronautics and  
Space Administration  
**Headquarters**  
Washington, DC 20546-0001



Reply to Attn of:

H

February 10, 2003

**General Services Administration (GSA)  
Regulatory Secretariat (MVA)  
1800 F Street NW  
Room 4035  
Washington, DC 20405**

The Federal Register of January 9, 2003 (GSAR Case 2002-G501), announced GSA's plan to amend the GSA Acquisition Regulation (GSAR) and charge subscribers to use certain email notification features of FedBizOpps.gov (FBO). As proposed, access to search FBO or receive email notices for specific procurements remains free for the time being. The proposed \$30.00 per year charge would apply to users who prefer email notification for classes of procurements or all procurements posted to FBO.

NASA was an early pioneer in posting business opportunities to the Internet. The Electronic Posting System, developed by the NASA Acquisition Internet Service, served as the basis for FBO. NASA's primary goal was to enhance competition by lowering, if not eliminating, entry barriers to doing business with the Government, especially for small and small disadvantaged businesses. Although costs are incurred in developing and hosting these posting tools and services, we believe unfettered access and an enhanced competitive environment are important to NASA, other Federal agencies, and our potential business partners.

The eGov element of the President's Management Agenda also aims to improve the citizens' experience with their government through on-line automated tools such as FBO. We believe the proposed charge, though not significant, is a potential barrier to the free flow of information and could inhibit participation by the small business community, where much of the innovation that agencies rely on originates. As eGov expands with new tools and services, we would prefer to see an eGov appropriation rather than individual agencies developing their own application-specific cost models.

We look forward to working with GSA and other interested agencies in developing a responsive management framework.

A handwritten signature in black ink that reads 'Tom Luedtke'.

Tom Luedtke  
Assistant Administrator  
for Procurement

A handwritten signature in black ink that reads 'Ralph C. Thomas III'.

Ralph C. Thomas III  
Assistant Administrator  
for the Office of Small & Disadvantaged  
Business Utilization

MEMORANDUM FOR LAURA SMITH  
DIRECTOR  
ACQUISITION POLICY DIVISION

FROM: RODNEY P. LANTIER, DIRECTOR  
REGULATORY AND FEDERAL ASSISTANCE  
PUBLICATIONS DIVISION

SUBJECT: GSAR Case 2002-G501, FEDBizOpps Notice on Charging for  
E-mail Notification Service

Attached are additional comments received on the subject FAR case published at  
68 FR 1358; January 9, 2003.

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-G501-7	2/10/03	2/10/03	Mark Krzysko OSD-ATL
2002-G501-8	2/10/03	2/10/03	Denise Clark/Cornell
2002-G501-9	2/10/03	2/10/03	Carol Blum
2002-G501-10	2/10/03	2/10/03	COGR
2002-G501-11	2/10/03	2/10/03	Frank J. Hannaford

Attachments



G501-7



"Krzysko, Mark, Mr,  
OSD-ATL"  
<Mark.Krzysko@osd.m  
il>

02/10/2003 04:20 PM

To: "gsarcase.2002-g501@gsa.gov" <gsarcase.2002-g501@gsa.gov>  
cc: "Kair, Lee R., SAF/AQCI" <Lee.Kair@pentagon.af.mil>, "Romney,  
Lisa, Ms, OSD-ATL" <Lisa.Romney@osd.mil>, "Balven, Lyndi, Col,  
OSD-ATL" <Lyndi.Balven@osd.mil>, "Lee, Deidre, Ms, OSD-ATL"  
<Deidre.Lee@osd.mil>, "Poussard, Ronald, Mr, OSD-ATL"  
<Ronald.Poussard@osd.mil>  
Subject: DOD COMMENTS FOR GSAR CASE 2002-G501

**SUBJECT LINE: DOD COMMENTS FOR GSAR CASE 2002-G501**

The Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics (Defense Procurement and Acquisition Policy) reviewed the Federal Register Notice regarding the proposed charge for e-mail notifications in FedBizOpps.

Defense Procurement and Acquisition Policy recommends not adopting this new charging model as contemplated for the following reasons:

1. Barrier to entry: The fundamental premise of FedBizOpps is aggregation of all business opportunities at a central location to provide transparency, increase competition, and make it easier to do business with the Federal Government. The proposed funding structure works in opposition to this premise. The premise of obtaining funding via charging for services disincentivizes use by the industry, the vendor community, and Government.

2. Does not solve the over-riding funding issue: Based on the current program estimates, the best-case revenue projections from this funding model would only cover approximately one third of the proposed cost of FedBizOpps. An overall funding methodology for all FedBizOpps costs need to be developed, implemented and governed prior to establishing any incremental funding strategy.

3. Inconsistent with the FedBizOpps designation evaluation criteria: The original evaluation criteria used by the Office of Management and Budget when it made its determination for the Governmentwide Point of Entry, compared FedBizOpps to CBDNet and referenced the NASA Acquisition Internet Service (NAIS) as the original baseline for FedBizOpps. Except for Value Added Networks, CBDNet did not charge the vendor community for access or services. The e-mail notification system used in FedBizOpps is baseline functionality imported from NAIS - which NASA continues to offer at no cost to vendors. The Office of Management and Budget used this free service as part of its rationale in its Governmentwide Point of Entry determination, and referenced it in Congressional testimony. It is inconsistent to change a fundamental tenant of the baseline system after the designation has already been made.

4. Reduces capability for Government Administrators: Currently thousands of Government personnel use the e-mail notification service to monitor their site's usage of FedBizOpps at the local level. This funding model would force them to individually pay for this administrative capability or lose it.

While Defense Procurement and Acquisition Policy does not concur with the proposed funding strategy, we agree that the General Services Administration should not continue to subsidize the operating costs of FedBizOpps. The Federal Government eGov Project, Integrated Acquisition Environment (IAE), included FedBizOpps cost in their FY05 budget request, which makes charging vendors unneeded.

Lastly, we encourage the development of an overarching governance structure for the Integrated

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Acquisition Environment. This structure is vital in formulating budgets, requirements, and business models for the future of FedBizOpps.

Thank you for the opportunity to comment on the proposed rule. We look forward to developing a methodology regarding this issue.

If you have any questions, please contact my action officer, Major Lee Kair, at [lee.kair@pentagon.af.mil](mailto:lee.kair@pentagon.af.mil).

*Mark E. Krzysko*  
*Director, Electronic Business*  
*Defense Procurement and Acquisition Policy*

*Office of the Under Secretary of Defense*  
*Acquisition, Technology and Logistics*



FedRegister GSA email charges.



Office of  
Sponsored  
Programs

Cornell University  
115 Day Hall  
Ithaca, NY  
14853-2801  
Telephone: 607 255-5014  
Fax: 607 255-5058  
Web: www.osp.cornell.edu

G501-8

February 10, 2003

General Services Administration  
Regulatory Secretariat (MVA)  
1800 F Street, NW.  
Room 4035  
Washington, DC 20405

Transmitted via e-mail to gsarcase.2002-g501@gsa.gov

Dear Sir or Madam,

On behalf of Cornell University I am writing in response to the January 9<sup>th</sup> *Federal Register* notice titled "General Services Administration Acquisition Regulation; FedBizOpps Notice on Charging for E-mail Notification Service" (GSAR case 2002-G501). Cornell University is a research institution with federal government-sponsored research expenses of over \$278,000,000 in fiscal year 2002.

Cornell's interest related to charging for e-mail services within FedBizOpps is due to the announcement last year that FedBizOpps will be the federal e-Grants solution for funding opportunity announcements. At a research university funding opportunities are not reviewed by a single person, but rather by dozens of faculty, researchers, and administrative staff. The e-mail notification method most valuable for faculty would be what is referred to in the notice as option 2, "receive all notices from selected organizations and product service classifications". Option 3; "register to receive all procurements" would at most be used by a single campus office to download and populate their own local funding opportunity database. Cornell questions the value and economics of charging a \$30 annual subscription fee for option 2 based on the following issues:

- In the proposed model it is unclear whether a university would be considered a single "vendor" or if each user (e.g., faculty member, researcher) would need to subscribe. If the university is a single vendor then the access mechanism would need to handle some concept of a site license allowing multiple logon names and passwords or an IP-based restriction. Our experience with these type of solutions for other subscription services is that they are difficult to manage and frustrating to the end user.
- If each user is required to subscribe independently at \$30 each and there are dozens of users across campus, this would not represent a "modest" total cost to the university. The institution would incur additional expenses in processing payment for each subscription.

9501-8

- How much of the \$30 fee will be spent maintaining the access control components of the system and processing the annual charges? Our experience with systems development projects suggests this may well be over 50 percent of the income generated. This would be a fairly inefficient way to generate funding to support the service.
- The charging scheme that is described for Commerce Business Daily suggested that VANs paid a significant premium to receive electronic feeds whereas other users paid a small fee to cover printing costs. The printed materials could be shared among multiple users within an institution. The new model significantly shifts the cost to individuals using option 2 while providing nearly free access to VANs using option 3.

While the charging scheme proposed may make sense for users interested in contracts it is not a viable solution for the new e-Grants constituents who you are now supporting. Cornell believes that the proposed charging plan will discourage use of FedBizOpps by university faculty. The benefits of e-mail notifications will not be worth the effort in processing the subscription fee. We also believe that it is inappropriate to shift the expense to individual users from VANs, most of whom are repackaging an enhanced version for resale. Based on these concerns Cornell strongly suggests that you consider charging subscribers to option 3 and charge an appropriate fee to recoup costs for this service. This model would better meet the needs of Cornell and other colleges and universities.

Thank you for the opportunity to provide comments.

Sincerely,

Denise Clark,  
Director, Office of Sponsored Programs

G501-9



"Carol Blum"  
<cblum@cogr.edu>  
02/10/2003 02:52 PM

To: gsarcase.2002-g501@gsa.gov  
cc:  
Subject: GSAR case 2002-G501 - Comment

The Council on Governmental Relations (COGR) submits the following comment on the proposed Charging for E-Mail Notification Service. A copy of the letter is attached and included below.

Carol Blum  
Associate Director  
Council on Governmental Relations (COGR)  
1200 New York Ave., NW Suite 320  
Washington DC 20005  
202-289-6655

February 10, 2003

Edward Loeb  
General Services Administration  
Regulatory Secretariat (MVA)  
1800 F Street NW, Room 4035  
Washington DC 20405

SUBJECT:  
GSAR Case 2002-G501: FedBizOpps Notice on Charging for E-Mail Notification Service

Dear Mr. Loeb:

The Council on Governmental Relations (COGR) is an association of 150 research intensive universities in the United States that works with federal agencies to develop a common understanding of the impact that policies, regulations and practices may have on the research conducted by its membership. We have commented on developments made by various Federal agencies that affect the content of and our access to funding opportunities information. An example of one such development is the Office of Management and Budget's recently proposed policy establishing a standard format for financial assistance announcements to enable potential applicants to easily and quickly access funding opportunities information.

We believe the General Services Administration's (GSA) proposed fee for email notification of opportunities posted on FedBizOpps is antithetical to the Federal government's goal of improving access to information. The entire effort to promote electronic access to information embodied in efforts like FirstGov.gov, Regulation.gov, and other government portals and e-Government initiatives is geared toward making government information easily accessible to the public. The email notification feature of FedBizOpps is similar to features used throughout federal agency web sites - all providing links to new web postings to ensure that interested persons receive timely up-dates. To the best of our knowledge, no other federal agency charges a fee for this email notification service.

The cumulative cost of the fees will be enormous for research universities and seriously disadvantage small businesses. In response to the Federal government's initiatives, universities have encouraged investigators and researchers to link directly to FedBizOpps to receive information on solicitations targeted to their research expertise. The proposed \$30 fee to be charged to each recipient of targeted notices from selected agencies and product service classifications will discourage investigators' participation in federal procurement activities. Universities are unable to absorb this cost for all their faculty and staff and are unwilling to return to the

G501-9

staff-intensive and equally costly central daily review of all Federal procurement solicitations for redistribution within the university.

The imposition of this fee is even more discouraging as the government moves to using FedBizOpps as the principal electronic portal for assistance announcements that award discretionary grants or cooperative agreements. The preponderance of current FedBizOpps postings focuses on contract solicitations. As the number of financial assistance announcements on FedBizOpps increases, the fee barrier will have an even greater impact on our ability to gain easy and quick access to the information our investigators need.

GSA notes that the fee will be adjusted annually based on prior year use implying that the fee could be, and likely will be, increased if the number of subscribers drops below an unidentified threshold. Any consideration of the initial fee and subsequent changes in the fee should be built on a thorough analysis of the actual costs of the email notification service and a justification for what constitutes a "fair share" of those cost to be provided by the public. If GSA persists in seeking to recover a share of the costs for what it defines as a value-added service, GSA should consider a "site license" approach for organizations that have multiple users.

We strongly oppose the imposition of a fee of any size for targeted email notification concerning information on FedBizOpps. We believe that this type of notification is and should remain a free service.

Sincerely

Katharina Phillips  
President



GSAR case 2002-G501 Comment.r

# COGR

an organization of research  
universities

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Center at San Antonio

KATHARINA PHILLIPS  
President

## COUNCIL ON GOVERNMENTAL RELATIONS

1200 New York Avenue, N.W., Suite 320, Washington, D.C. 20005  
(202) 289-6655/(202) 289-6698 (FAX)

Electronic Submission to: [gsarcase.2002-g501@gsa.gov](mailto:gsarcase.2002-g501@gsa.gov)

February 10, 2003

Edward Loeb  
General Services Administration  
Regulatory Secretariat (MVA)  
1800 F Street NW, Room 4035  
Washington DC 20405

SUBJECT: GSAR Case 2002-G501: FedBizOpps Notice on  
Charging for E-Mail Notification Service

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9501-10

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Sincerely

Katharina Phillips  
President



G501-11



"Frank J. Hannaford"  
<[frank.hannaford@securityposture.com](mailto:frank.hannaford@securityposture.com)>

To: [gsarcase.2002-g501@gsa.gov](mailto:gsarcase.2002-g501@gsa.gov)  
cc:  
Subject: Re: Proposed rule establishing fees for use of FedBizOpps email notification features

02/10/2003 04:49 PM

Sir / Madam:

As a daily user of FedBizOpps on behalf of several small businesses with whom I work as a consultant, I am aghast at the notion of charging fees to any user of FedBizOpps. Clearly, raising any barrier to access reduces the pool of possible competitors for Federal business opportunities. Fees, by their very nature, create an undue burden on small firms / independent consultants. In this case, given the limited resources small firms / independent consultants have for locating opportunities, charging for use of features that make locating opportunities easier is even more unfair.

Please, please, reconsider and drop the proposed rule...

Regards,  
Frank J. Hannaford  
Phone: (402) 453-4326 (direct)  
Email: [frank.hannaford@securityposture.com](mailto:frank.hannaford@securityposture.com)  
Email: [frank20@cox.net](mailto:frank20@cox.net)



Email: [forefront@cox.net](mailto:forefront@cox.net) Frank J. Hannaford.vc