

**COUNCIL OF DEFENSE AND SPACE INDUSTRY ASSOCIATIONS**  
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Delivered by email

April 13, 2018

Ms. Lesley Field  
Acting Administrator  
Office of Federal Procurement Policy  
Office of Management and Budget

Dear Ms. Field:

On behalf of the Council of Defense and Space Industry Associations (CODSIA),<sup>1</sup> we are writing to share with you our comments in response to the Department of Defense (DoD) Request for Comment on “Procurement Administrative Lead Time” or “PALT” (DARS-2018-0005), and to urge you to extend this new requirement, currently applicable to DoD only, governmentwide.

Section 886 of the Fiscal Year 2018 National Defense Authorization Act requires the Secretary of Defense to develop, make available for public comment, and finalize a definition of the term PALT, to be applied to DoD. At a minimum, the definition is to describe the amount of time from the date on which a solicitation is issued to the date of an initial award of a contract or task order by DoD. The Secretary must also produce a plan for measuring and publicly reporting data on PALT for DoD contracts and task and delivery orders above the simplified acquisition threshold. On February 9, DoD issued a request for comment in the *Federal Register*<sup>2</sup> and CODSIA provided comments on March 12.<sup>3</sup>

While CODSIA strongly supports the proposed definition and urges rapid implementation of Section 886, we believe the government can and should go further. While Section 886 applies only to DoD, civilian agencies also experience long procurement lead times and lack uniform metrics and data collection tools.

A governmentwide approach to data collection will ensure that efforts to reduce acquisition cycle times are focused on widespread challenges, and are not limited to specific problems with a particular contract, type of purchase, or buying activity. At the same time, CODSIA acknowledges that different sectors may have unique issues to address. Harmonizing, tracking,

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<sup>1</sup> CODSIA was formed in 1964 by industry associations with common interests in federal procurement policy issues at the suggestion of the Department of Defense. CODSIA consists of seven associations – Aerospace Industries Association (AIA), American Council of Engineering Companies (ACEC), Associated General Contractors (AGC), Information Technology Alliance for Public Sector (ITAPS), National Defense Industrial Association (NDIA), Professional Services Council (PSC), and U.S. Chamber of Commerce. CODSIA’s member associations represent thousands of government contractors nationwide. The Council acts as an institutional focal point for coordination of its members’ positions regarding policies, regulations, directives, and procedures that affect them. A decision by any member association to abstain from participation in a particular case is not necessarily an indication of dissent.

<sup>2</sup> See <https://www.federalregister.gov/documents/2018/02/09/2018-02599/opportunity-for-public-comment-on-proposed-definition-of-procurement-administrative-lead-time-or>

<sup>3</sup> See:

<https://www.pscouncil.org/Downloads/documents/Hill%20Letters/CODSIA%20Comments%20on%20DoD%20PALT%20Proposed%20Rule%20-3.12.18.pdf>

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and reporting of PALT across the government will also improve overall performance and increase the effectiveness and efficiency of the acquisition process.




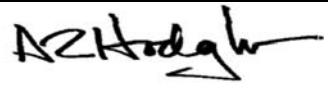
As addressed in the statute, and as noted in the February 9 request for comment, the best mechanism for agency reporting of PALT is through the Federal Procurement Data System – Next Generation (FPDS-NG). The law directs the Secretary of Defense to work in coordination with the Administrator of the General Services Administration (GSA) to implement Section 886 using existing data systems.

Using FPDS-NG to implement Section 886 will provide for a seamless transition to a governmentwide PALT requirement. Since all federal agencies already capture their procurement information in FPDS-NG, all federal agencies should be able to capture their own core PALT data in FPDS-NG with minimal cost and effort. Doing so now would also prevent GSA from having to apply the data fields retroactively, should this requirement be extended governmentwide.

The Acquisition Reform Working Group<sup>4</sup> is working with Congress on a legislative requirement for the civilian agencies that mirrors the DoD requirement in Section 886. Yet we believe the spirit of Section 886 intends for this requirement to extend to all federal agencies. Accordingly, we urge you to (1) support speedy acceptance and implementation of the DoD request for a revision to FPDS to allow DoD to use that governmentwide system for collecting its data; (2) require all federal agencies to begin capturing PALT data immediately, using the common definition provided for in statute; and (3) task the agencies to start tracking PALT earlier in the acquisition lifecycle than release of the RFP, as described in the attached comments.

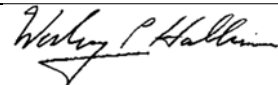

Thank you for your attention to these comments. If you have any questions or need any additional information, please contact Alan Chvotkin of the Professional Services Council, who serves as our project officer for this case. He can be reached at [chvotkin@pscouncil.org](mailto:chvotkin@pscouncil.org) or (703) 875-8148.

Sincerely,

	
John Luddy Vice President National Security Aerospace Industries Association	Steve Hall Vice President, Government Affairs American Council of Engineering Companies
	
Jimmy Christianson Regulatory Counsel Associated General Contractors of America	A.R. "Trey" Hodgkins, III, CAE Senior Vice President, Public Sector Information Technology Alliance for the Public Sector

<sup>4</sup> The Acquisition Reform Working Group (ARWG) is comprised of the various trade associations including the members of CODSIA that work collectively on legislative efforts to improve the acquisition process.

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Wesley P. Hallman Senior Vice President for Policy National Defense Industrial Association	Alan Chvotkin Executive Vice President and Counsel Professional Services Council

Enclosure: CODSIA March 12. Comments