

COUNCIL OF DEFENSE AND SPACE INDUSTRY ASSOCIATIONS
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codsia@codsia.org

September 11, 2017

Defense Acquisition Regulations System
Attn: Ms. Linda Nielson
DFARS Subgroup RRTF
OUSD (AT&L) DPAP/DARS
Room 3B941
3060 Defense Pentagon
Washington, DC 20301-3060

Subject: Defense Federal Acquisition Regulation Supplement (DFARS); DFARS Subgroup to the Department of Defense (DoD) Regulatory Reform Task Force, Review of DFARS Solicitation Provisions and Contract Clauses (DFARS-RRTF-2017-01) – CODSIA Case 2017-004.

Dear Ms. Nielson:

On behalf of the undersigned members of the Council of Defense and Space Industry Associations (CODSIA),¹ we offer the attached comments for the Defense Federal Acquisition Regulation Supplement (DFARS) Subgroup to the Department of Defense (DoD) Regulatory Reform Task Force (RRTF) review of DFARS solicitation provisions and contract clauses. We appreciate your extension of the comment period; however, given the length and complexity of the DFARS, our review is largely limited to high-priority areas on which we could reach consensus. Omission of commentary on a specific solicitation provision or contract clause does not necessarily mean that it should not be modified or removed, and we encourage further government-industry discussion on ways to streamline and improve the DFARS.

We thank you for your attention to our comments and considering our recommendations. If you need any additional information, please contact Mr. Ryan Ouimette, the CODSIA case manager, at rouimette@ndia.org or (703) 247-9463. To facilitate further dialogue with CODSIA and our member associations, please contact Mr. David Drabkin, at CODSIA@codsia.org, who serves as CODSIA Administrator.

Respectfully submitted,



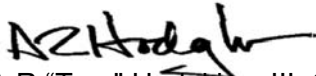
John Luddy
Vice President National Security
Aerospace Industries Association



Jimmy Christianson
Regulatory Counsel
Associated General Contractors of America

¹ At the suggestion of the Department of Defense, CODSIA was formed in 1964 by industry associations with common interests in federal procurement policy issues. CODSIA consists of seven associations – the Aerospace Industries Association, the American Council of Engineering Companies, the Associated General Contractors of America, the Information Technology Alliance for Public Sector, the National Defense Industrial Association, the Professional Services Council, and the U.S. Chamber of Commerce. CODSIA acts as an institutional focal point for coordination of its members' positions regarding policies, regulations, directives, and procedures that affect them. Together these associations represent thousands of government contractors and subcontractors. A decision by any member association to abstain from participation in a particular case is not necessarily an indication of dissent.

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