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To: David C. Childs A-76comments/OMB/EOP@EOP
cc:
Subject: A-76 Performance of Commercial Activities

On behalf of the 120 plus employees of 3001, Inc., I applaud President Bush and OMB for their efforts to revise Circular A-76 as it will open up jobs to all Americans, including small businesses. Entrepreneurs and workers will have new opportunities to seek work previously unavailable to the private sector and it will help eliminate unfair government competition.

For too long our employees have missed opportunities to provide geospatial services to Federal agencies, state and local government bodies because of Agency-to-Agency arrangements. Accordingly, I particularly support the provisions that eliminate Unfair Competition under Agency-to-Agency arrangements. I strongly support the provisions in the Circular that eliminate the current practice that permits agencies to do work for other Federal agencies, and for state and local government.

"Geospatial activities" such as surveying, mapping, charting, geodesy, image acquisition, and geospatial information acquisition and production are all commercial activities. I strongly support direct conversion of these activities to the private sector.

However, I respectfully request a clarification in the Circular that any public-private standard competitions under A-76 for architecture, engineering, surveying and mapping services be in compliance with the Brooks Act's qualifications based selection (QBS) process, as required in 40 United State Code, section 541-544 and part 36 of the Federal Acquisition Regulation (FAR).

Thank you for the opportunity to express my views.

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