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

cc:

Subject: OMB Circular No. A-76 Revision

Mr. David Childs
Office of Federal Procurement Policy
Office of Management and Budget
725 17th Street, NW
NEOB Room 9013
Washington, DC 20503

Dear Mr. Childs,

BIFMA International supports the A-76 revisions opening up jobs to all businesses and helping to eliminate unfair government competition. Under the proposed changes, entrepreneurs and workers will have new opportunities to seek work previously unavailable to the private sector.

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

Bringing the time frames for conducting public-private competitions into line with standard procurements is very reasonable and we support the revision that states that a "standard competition shall not exceed 12 months."

We also support the provisions that eliminate unfair competition under Agency-to-Agency arrangements. These provisions would eliminate the current practice that permits Federal agencies to obtain commercial work non-competitively from other Federal agencies, and for state and local government.

As you know, BIFMA has long sought reform Federal Prison Industries, Inc. within the Bureau of Prisons which has historically operated outside of the standard procurement process. We have done so with the belief that the ability for all parties to compete on a fair and level playing field is only fair and is in the best interest of the taxpayer, businesses, and the end customer. We believe the revisions to Circular A-76 move in that direction.

Sincerely,

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