



January 11, 2013

Office of Federal Procurement Policy
Attn: Mr. Raymond J.M. Wong
725 17th Street, NW, Room 9013
Washington, DC 20503

Via email: casb2@omb.eop.gov

Reference: Cost Accounting Standards: Revision of the Exemption From Cost Accounting Standards for Contracts and Subcontracts for the Acquisition of Commercial Items

Dear Mr. Wong:

The Aerospace Industries Association (AIA) appreciates the opportunity to comment on the Cost Accounting Standards Board's proposed rule to clarify the exemption for contracts and subcontracts for the acquisition of commercial items so that the regulatory text is more consistent with the statutory text. This proposed rule was published in the Federal Register on November 19, 2012.

Our member companies appreciate the CAS Board's actions in publishing a proposed rule to help clarify the CAS rules and make them more consistent with statutory text. Our member companies agree with the proposed rule clarification to subsection (b)(6) of 48 CFR 9903.201-1 that amends it to read "Contracts and subcontracts for the acquisition of commercial items."

On behalf of its member companies, AIA thanks you for the opportunity to provide these comments. If you have any questions or need any additional information, please contact Terrence Marcinko at 703-358-1042 or terry.marcinko@aia-aerospace.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'William Greenwalt', with a long, sweeping flourish extending to the right.

William Greenwalt
Vice President, Acquisition Policy