

COUNCIL OF DEFENSE AND SPACE INDUSTRY ASSOCIATIONS
4401 Wilson Boulevard, Unit 204
Arlington, Virginia 22203
703875-8059

December 2, 2011

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: Clarification of the Exemption from Cost Accounting Standards for Firm-Fixed-Price Contracts and Subcontracts Awarded Without Submission of Certified Cost or Pricing Data – Proposed Rule

Dear Mr. Wong:

The Council of Defense and Space Industry Associations (CODSIA)¹ appreciates the opportunity to comment on the Cost Accounting Standards Board's proposed rule to clarify the application of the exemption from CAS for firm-fixed-price (FFP) contracts and subcontracts awarded on the basis of adequate price competition without submission of cost or pricing data. This proposed rule was published in the Federal Register on October 5, 2011.

Our member companies appreciate the CAS Board's actions in publishing a proposed rule to help clarify and maintain the intent of the CAS rules as a result of the August 30, 2010 change to the FAR. Our member companies agree with the proposed rule clarification to subsection (b)(15) of 48 CFR 9903.201-1 by adding in the word "certified" as it appears in Pub. L. 111-350 Sec. 1502(b)(1)(C)(iii).

CODSIA's member associations thank you for the opportunity to provide these comments. If you have any questions or need any additional information, please contact Susan Tonner with the

¹ In 1964 the Department of Defense urged the industry associations with common interests in federal procurement policy to establish a group to act as a unified voice for industry on federal procurement policy. CODSIA currently consists of six industry trade associations and through the company members of those associations represents thousands of federal government contractors nationwide on acquisition policy issues. This unique status as the conveyor of regulatory comments for some of the largest trade associations working on acquisition policy also represents the collective expertise of these associations and the companies they represent.

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Aerospace Industries Association and the CODSIA project officer for this case. She can be reached at susan.tonner@aia-aerospace.org or at 703-358-1087. You may also contact Bettie McCarthy, CODSIA's Administrative Officer, at 703-875-2051 or codsia@pscouncil.org.

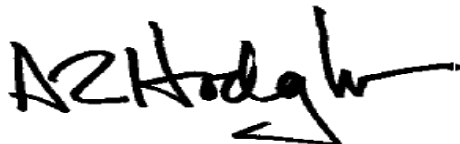
Sincerely,



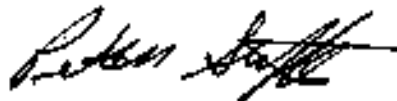
Susan Tonner
Assistant Vice President, Acquisition Policy
Aerospace Industries Association



Alan Chvotkin
Executive Vice President & Counsel
Professional Services Council



A.R. "Trey" Hodgkins, III
Senior Vice President, National Security
and Procurement Policy
TechAmerica



Peter Steffes
Vice President, Government Policy
National Defense Industrial Association



R. Bruce Josten
Executive Vice President, Government Affairs
U.S. Chamber of Commerce



Richard L. Corrigan
Policy Committee Representative
American Council of Engineering Companies