Project On Government Oversight

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December 20, 2010

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

Re:

(b)(14) Overseas Exemption NPR—Cost Accounting Standards: Elimination of the Exemption from Cost Accounting Standards for Contracts Executed and Performed Entirely Outside the United States, Its Territories, and Possessions—Notice of Proposed Rule

Dear Mr. Wong:

Thank you for the opportunity to comment on the Cost Accounting Standards (CAS) Board's proposed rule entitled "Cost Accounting Standards: Elimination of the Exemption from Cost Accounting Standards for Contracts Executed and Performed Entirely Outside the United States, Its Territories, and Possessions" (75 FR 64684, October 20, 2010).

Founded in 1981, the Project On Government Oversight (POGO) is a nonpartisan independent watchdog that champions good government reforms. POGO's investigations into corruption, misconduct, and conflicts of interest achieve a more effective, accountable, open, and ethical federal government. POGO has a keen interest in government contracting matters, especially those relating to the ongoing activities of the CAS Board.

POGO fully supports the CAS Board's proposed rule, and urges it be made final and effective at the earliest possible date. POGO particularly appreciates the Board's acknowledgment in the preamble to the proposed rule of POGO's substantive comments.

Sincerely,

Scott H. Amey General Counsel

Suite 900 Washington, DC Phone: 202-347-1122