



September 9, 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: CAS-TINA Threshold; Cost Accounting Standards: Change to the CAS Applicability Threshold for the Inflation Adjustment to the Truth in Negotiations Act Threshold – Interim Rule

Dear Mr. Wong:

The Aerospace Industries Association (AIA) appreciates the opportunity to comment on the Cost Accounting Standards Board's interim rule revising the threshold for the application of CAS from "\$650,000" to "the Truth in Negotiations Act (TINA) threshold, as adjusted for inflation". This interim rule was published in the Federal Register on July 12, 2011.

Our member companies agree with the interim rule revisions to 48 CFR Parts 9901 and 9903. By revising the CAS applicability threshold so that it directly references the Federal Acquisition Regulation (FAR) TINA threshold for the submission of cost or pricing data (rather than referencing a stated dollar amount), any future changes to the FAR TINA threshold will automatically apply to the CAS applicability threshold. This is a good step in streamlining the process (i.e., deleting the requirements for future interim and final CAS rules for TINA changes).

Therefore, our member companies do not have any further recommendation insofar as those revisions to the CAS rules in 48 CFR Parts 9901 and 9903. However, FAR Part 30 and the clauses at FAR 52.230 continue to reference the \$650,000 which is now outdated. We realize that FAR Part 30 and 52.230 are the responsibility of the FAR Council and not the CAS Board, so we have copied the members of the FAR Council on this correspondence to ensure they are aware of those necessary revisions to FAR Part 30 and the contract clauses at FAR 52.230.

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 me at 703-358-1087 or susan.tonner@aia-aerospace.org.

Sincerely,

A handwritten signature in black ink that reads "Susan K. Tonner".

Susan K. Tonner
Assistant Vice President, Acquisition Policy

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Copy furnished:

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