AEROSPACE INDUSTRIES ASSOCIATION

September 21, 2012

General Services Administration
Regulatory Secretariat (MVCB)
1275 First Street NE.
Washington, DC 20417

ATTN: Curtis Glover/IC 9000-0075

Email: http://www.regulations.gov

Subject: Information Collection 9000-0075

Dear Mr. Glover:

The Aerospace Industries Association (AIA) is pleased to respond to the request for comments on Information Collection 9000-0075 concerning Government property. This is a very important issue and we appreciate the opportunity to provide both comments and insight for your consideration.

The Federal Register notes the following: "Public comments are particularly invited on: Whether this collection of information is necessary for the proper performance of functions of the Federal Acquisition Regulations (FAR), and whether it will have practical utility; whether our estimate of the public burden of this collection of information is accurate, and based on valid assumptions and methodology; ways to enhance the quality, utility, and clarity of the information to be collected; and ways in which we can minimize the burden of the collection of information on those who are to respond, through the use of appropriate technological collection techniques or other forms of information technology."

AIA will address the general responses to the request in this letter with a more detailed approach in the attached table.

Over the last decade the Government has made substantial progress in the management and reporting of Government property particularly with the publication of the FAR rewrite of June 2007 and subsequent changes, reporting through DoD's Item Unique Identification (IUID) Registry and the establishment and improvements with the Government's eTools applications. We applaud the Government's progress and are proud that our member companies have been invited to participate in these efforts.

- **"Whether this collection of information is necessary for the proper performance of functions of the Federal Acquisition Regulations (FAR).**

Yes and no, depending how the requirements are interpreted. The word "all" that is included in FAR Part 45 and related clause causes multiple problems for the Government and industry – as well as creating a tremendous amount of paperwork and administrative cost. The collection of FAR Part 45 information is necessary only when the requirements of FAR Part 45 are interpreted consistently and simultaneously with the constraints of other authoritative laws, regulations, and Executive Orders. Generally, industry has found this not to be the case.

"Property, as defined in the current FAR Part 45, means **all** property, both real and personal. It includes material, equipment, special tooling, special test equipment, and real property. Government property includes both Government-furnished property and contractor-acquired property.

Contractors are required to establish and maintain a property system that will control, protect, preserve, and maintain **all** Government property because the contractor is responsible and accountable for **all** Government property under the provisions of the contract including property located with subcontractors.

... (iii) *Records of Government property.* The Contractor shall create and maintain records of **all** Government property accountable to the contract, including Government-furnished and Contractor-acquired property."

Contractors do establish and maintain records, and provide reports necessary for FAR Part 45 requirements but not all property is managed and accounted for in the same way. FAR Part 45 requirements are constrained by the following:

(1)The Federal Property and Administrative Services Act of 1949, which establishes GSA and the FAR:

"(40 U.S.C. 471) À DECLARATION OF POLICY.
It is the intent of the Congress in enacting this legislation to provide for the Government an economical and efficient system for (a) the procurement and supply of personal property ...; (b) the utilization of available property; (c) the disposal of surplus property; ..."

These constraints are not widely recognized by either government or industry personnel. Requiring records and maintenance of records on **all** property, regardless of cost and benefits is neither economical nor efficient. Many contractors require their employees, as a condition of employment, to obey all laws and regulations both in letter and spirit. The letter and spirit of the law and the associated regulation (to establish records on **all** property) can be interpreted to be in conflict with one another.

(2) FAR Part 1 1.102 – Statement of Guiding Principles for the Federal Acquisition System.

"(a) The vision for the Federal Acquisition System is to deliver on a timely basis the best value product or service to the customer (b) The Federal Acquisition System will (1) Satisfy the customer in terms of cost, quality, and timeliness of the delivered product or service by, for example -- (2) Minimize administrative operating costs;" and under 1.102-2 -- Performance Standards. (b) Minimize administrative operating costs.

(1) In order to ensure that maximum efficiency is obtained, rules, regulations, and policies should be promulgated only when their benefits clearly exceed the costs of their development, implementation, administration, and enforcement. This applies to internal administrative processes, including reviews, and to rules and procedures applied to the contractor community."

On the surface, certain elements of FAR Part 45 do not create an environment or contractual requirement to minimize administrative cost. Only when the requirements of FAR 45 are viewed in totality and performed through the lens of FAR Part 1 is administrative operating cost minimized. Regulations in FAR Part 1 as well as FAR Part 45 apply and should be viewed as compatible. The audit community tends to only recognize the requirements in FAR Part 45 without considering the requirements in FAR Part 1. Some changes, as underlined, recently included in the Government Property clause 52.245-1, not mentioned the Federal Register but providing clarification can be found in (b) Property management. (1) The Contractor shall have a system of internal controls to manage (control, use, preserve, protect, repair, and maintain) Government property in its possession. The system shall be adequate to satisfy the requirements of this clause. In doing so, the Contractor shall initiate and maintain the processes, systems, procedures, records, and methodologies necessary for effective and efficient control of Government property. These are important additions and clarifications as "internal controls" is defined in law, the GAO Yellow Book and OMB Circular A-123 - Internal Controls -- and this means "effective and efficient operations, reliable financial reporting (includes other reporting), and compliance with applicable laws and regulations." Effective and efficient operations cannot occur without the recognition of the constraints of materiality and costs and benefits. **All** does not necessarily mean all. All should be interpreted to mean all that is worthwhile to customers and decision makers. This should be discussed, worked and resolved with the customer and defined by neither Government auditors nor internal auditors.

FAR 31 requirements also reinforce the need to be effective and efficient regarding cost of work. Cost charged to the Government must be reasonable cost.

31.201-3 -- Determining Reasonableness. (a) A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person in the conduct of competitive business...

A prior accepted charging practice to Government contracts is not the criteria or even if accepted by Government officials, as Government officials may not direct contractors to perform acts inconsistent with applicable law and regulation. (1.602 -- Contracting Officers. 1(b) No contract shall be entered into unless the contracting officer ensures that all requirements of law, executive orders, regulations, and all other applicable procedures, including clearances and approvals, have been met.)

The definition of "abuse" in the Yellow Book is essentially the same definition of unreasonable cost. "4.07 Abuse involves behavior that is deficient or improper when compared with behavior that a prudent person would consider reasonable and necessary business practice given the facts and circumstances."

A better and more consistent interpretation would be if operations are not effective and efficient, regardless if operations are compliant with internal procedures, these result in a deficiency of internal controls.

(3) Executive Order 13563 of January 18, 2011 (Improving Regulation and Regulatory Review),

a) propose or adopt a regulation only upon a reasoned determination that its benefits justify its costs ...;
b) tailor its regulations to impose the least burden on society, consistent with obtaining regulatory objectives, taking into account, among other things, and to the extent practicable, the costs of cumulative regulations;

c) select, in choosing among alternative regulatory approaches, those approaches that maximize net benefits...;
d) to the extent feasible, specify performance objectives, rather than specifying the behavior or manner of compliance that regulated entities must adopt;"

The executive order, not only applies to creation of regulations but to implementation and enforcement.

FAR Part 45, which reflects some of the accounting requirements, should be interpreted to include FASAB No. 6, which includes disclaimers or a constraints concerning materiality... "15 The provisions of this statement need not be applied to immaterial items."

A guide or a clarification in the FAR should be published that points out the priority of the desired outcome of effective and efficient operations over the control, establishing records and maintaining records of all property. **All** does not necessarily mean all and **all** items do not need to be accounted for and managed in the same way.

- **whether it will have practical utility;**

There is no practical utility for establishing records on all property, at each level. Useful information for decision making purposes is camouflaged by superfluous data. The customer should determine what specific worthwhile records should be established and maintained providing the appropriate level of visibility which is consistent with portions of the newly published DFARS 211.7003. Customers should determine what is serially managed. This is a pull approach rather than a push approach of reporting.

- **whether our estimate of the public burden of this collection of information is accurate, and based on valid assumptions and methodology;**

The estimated total burden of 4,350,650 hours per year is significantly underestimated. DCMA alone estimates they oversee $150 billion of property at contractor sites. This appears to be understated, especially in light of an interpreted requirement to record and control **all** property, - regardless of the cost of the item. Currently, according to those familiar with IUID efforts, about ninety percent of all tagged items have an acquisition cost of less than $5000. Industry estimates conservatively that it takes about two labor hours per year for a property custodian to manage a tagged item. Tagged items make up only a portion of total Government Property – there is also contractor acquired material, Government furnished material, and items under Government depot contracts.

A better estimate approach is to start with two hours per item of tagged property per year. Then an equivalent amount for government material and reparables. The IUID registry currently contains about ten percent of the equipment tagged located at contractor's sites under DoD contracts. In addition, other government agencies subject to the FAR should be considered in the analysis.

- **ways to enhance the quality, utility, and clarity of the information to be collected; and ways in which we can minimize the burden of the collection of information on those who are to respond, through the use of appropriate technological collection techniques or other forms of information technology."**

AIA recommends the following to be placed in regulation or guides:

- Focus on reaching desired outcomes rather than a specified process (this is consistent with the President Obama's EO). Seek to change the cultures of those involved through the training of contractors, Government decision makers, and auditors – including Government property administrators. Do not seek perfectly detailed procedures then audit against those procedures just to find deficiencies when there will be normal and reasonable variations that result in no harm to the Government.

- Information quality, utility, and clarity standards should be established by the actual user community and decision makers that believe the information is worthwhile. The information must have value beyond passing audits.

- Always recognize the necessity of avoiding waste, abuse and unreasonable cost by identifying actions that are simply not worthwhile ("benefits clearly exceed the costs" per the performance standard cited). For example, assume there is a requirement to cost something in the records at full cost using industry or Government accounting standards. This can lead to an expensive process of setting up separate shop orders per item, - making sure those who work on the item understand accounting requirements differentiating the true property cost from other contract cost, continually tracking the cost until ready for use or acceptance, then closing out the shop order and recording the final cost. This in spite of the fact that costs associated with Government process has not been captured.

- Use thresholds in defining reporting requirements, establish records to address a particular need, identify items in groups or systems rather than at the item level.

- Eliminate restraints (individual Government approval) on "receipt and issue" systems of acquiring and using property. When not using a receipt and issue system there is unnecessary administrative costs in the form of movement, records, storage, storage facilities, staffing, inventories.... A "just in time" inventory approach and the use of purchase cards normally do not include processing items through stockrooms.

- Further define accountability vs. accounting. For example for accounting purposes DoD may have established a capital threshold to be $100,000 – because of cost, benefits and efficient item management purposes. Accountability may be over a site, building or area; - the approach should be based upon need, risk, costs and benefits.

- Sunset all paper based forms in lieu of electronic forms included in Government/industry databases.

- Embrace higher level technology that includes databases with applications of document work flow, document management, survey tools, and paperless forms using electronic tablets or smart phones.

AIA believes our comments and suggestions will help improve regulations, guidance oversight and will improve contractor performance by continuously leaning out processes of contractors so that they become more effective and efficient. Our members stand ready to continue to improve the Government's property management.

If you have any questions or want addition details of our comments please feel free to contact me.

We appreciate your consideration of our comments. I may be reached by phone at 703.358.1045 or by e-mail at bill.greenwalt@aia-aerospace.org.

Best regards,

William Greenwalt
Vice President, Acquisition Policy
Aerospace Industries Association

Cc : OMB

AIA Review of Collection of Information 9000-0075 GP Reporting Date Released: 8 23 2012

Response Due: 9 24 12

	Information Collection	Correction or clarification	**Comments**
	[Federal Register Volume 77, Number 164 (Thursday, August 23, 2012)] **[Notices]** **[Pages 51026-51027]** **From the Federal Register Online via the Government Printing Office [www.gpo.gov]** **[FR Doc No: 2012-20741]**		
1.	DEPARTMENT OF DEFENSE GENERAL SERVICES ADMINISTRATION NATIONAL AERONAUTICS AND SPACE ADMINISTRATION [OMB Control No. 9000-0075; Docket 2012-0076; Sequence 19] Federal Acquisition Regulation; Submission for OMB Review; Government Property AGENCY: Department of Defense (DOD), General Services Administration (GSA), and National Aeronautics and Space Administration (NASA). ACTION: Notice of request for public comments regarding an extension to an existing OMB clearance.		
2.	SUMMARY: Under the provisions of the Paperwork Reduction Act, the Regulatory Secretariat will be submitting to the Office of Management		

	Information Collection	Correction or clarification	Comments
	and Budget (OMB) a request to review and approve an extension of a previously approved information collection requirement concerning Government Property. A notice was published in the Federal Register at 76 FR 18497, on April 4, 2011. No comments were received.		
3.	Public comments are particularly invited on: Whether this collection of information is necessary for the proper performance of functions of the Federal Acquisition Regulations (FAR), and whether it will have practical utility; whether our estimate of the public burden of this collection of information is accurate, and based on valid assumptions and methodology; ways to enhance the quality, utility, and clarity of the information to be collected; and ways in which we can minimize the burden of the collection of information on those who are to respond, through the use of appropriate technological collection techniques or other forms of information technology.		See Cover Letter.
4.	DATES: Submit comments on or before September 24, 2012.		
5.	ADDRESSES: Submit comments identified by Information Collection 9000-0075 by any of the following methods: Regulations.gov: http://www.regulations.gov. Submit comments via the Federal eRulemaking portal by searching the OMB control number. Select the link ``Submit a Comment'' that corresponds with ``Information Collection 9000-0075''. Follow the instructions provided at the ``Submit a Comment'' screen. Please include your name, company name (if any), and ``Information Collection 9000-0075'' on your attached document.		

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	Fax: 202-501-4067. Mail: General Services Administration, Regulatory Secretariat (MVCB), 1275 First Street NE., Washington, DC 20417. ATTN: Hada Flowers/IC 9000-0075.		
6.	Instructions: Please submit comments only and cite Information Collection 9000-0075, in all correspondence related to this collection. All comments received will be posted without change to http://www.regulations.gov, including any personal and/or business confidential information provided.		
7.	FOR FURTHER INFORMATION CONTACT: Mr. Curtis E. Glover, Sr., Procurement Analyst, Office of Acquisition Policy, GSA (202) 501-1448 or email curtis.glover@gsa.gov.		
8.	SUPPLEMENTARY INFORMATION: A. Purpose		
9.	Property, as used in Part 45, means all property, both real and personal. It includes facilities, material, special tooling, special test equipment, and agency-peculiar property. Government property includes both Government-furnished property and contractor-acquired property.	Property, as used in Part 45, means all property, both real and personal. It includes ~~facilities,~~ material, equipment, special tooling, special test equipment, and ~~agency-peculiar~~ real property. Government property includes both Government-furnished property and contractor-acquired property	Facilities and Agency Peculiar Property are obsolete terms as of June 2007. Part 45.101: "Property" means all tangible property, both real and personal. "Contractor-acquired property" means property acquired, fabricated, or otherwise provided by the contractor for performing a contract and to which the Government has title. "Government property" means all property owned or leased by the Government. Government

	Information Collection	Correction or clarification	Comments
			property includes both Government-furnished property and contractor-acquired property. Government property includes material, equipment, special tooling, special test equipment, and real property. Government property does not include intellectual property and software. The word "all" causes multiple problems for the Government and industry – as well as causes a tremendous amount of waste in administrative cost. Under FASAB 6 the DoD, for example, established a capital threshold of $100,000. For good reason – Standard No. 6 states: " MATERIALITY 15 The provisions of this statement need not be applied to immaterial items. DoD on the other hand, recently changed the reporting standard on equipment in DFARS 252.211-7007 eliminating the $5000 threshold for reporting to the IUID Registry. The $5000 threshold allowed Contractors to not have to report these low value items – that is about ninety percent of the contractors line items. What goes into the IUID records must be reconciled and come out. Within multiple laws, regulations and executive orders, OMB guidance, the GAO Yellow Book … are basic principles that efforts must be effective, economical and efficient … For example in Executive Order 13563 of

	Information Collection	Correction or clarification	Comments
			January 18, 2011 (Improving Regulation and Regulatory Review), Section 1. General Principles of Regulation. (a) … It must take into account benefits and costs, both quantitative and qualitative. (b) . .. propose or adopt a regulation only upon a reasoned determination that its benefits justify its costs… The property management record requirements do not adequately, recognize, promote or use these standards.
10.	Contractors are required to establish and maintain a property system that will control, protect, preserve, and maintain all Government property because the contractor is responsible and accountable for all Government property under the provisions of the contract including property located with subcontractors. This clearance covers the following requirements:	**Incorrect Reference:**	
11.	(a) FAR 45.606-1 requires a contractor to submit inventory schedules.	**Incorrect Reference:** **45.606 Contractor scrap procedures.** (a) The property administrator should, in coordination with the plant clearance officer, ensure that contractor scrap disposal processes, methods, and practices allow for effective, efficient, and proper disposition and are properly documented in the contractor's property management procedures. (b) The property administrator should determine the extent to which separate	The portion of the regulation is a great improvement over past regulations and practices. Generally there is excessive administrative burden and oversight of worn obsolete property that has little or no residual or reusable value.

	Information Collection	Correction or clarification	Comments
		disposal processing or physical segregation for different scrap types is or may be required. Such scrap may require physical segregation, unique disposal processing, or separate plant clearance reporting. For example, the scope of work may create scrap— (1) Consisting of sensitive items; (2) Containing hazardous materials or wastes; (3) Contaminated with hazardous materials or wastes; (4) That is classified or otherwise controlled; (5) Containing precious or strategic metals; or (6) That is dangerous to public health or safety. (c) Absent contract terms and conditions to the contrary, the Government may abandon parts removed and replaced from property as a result of normal maintenance actions or removed from property as a result of the repair, maintenance, overhaul, or modification process.	
12.	(b) FAR 45.606-3(a) requires a contractor to correct and resubmit inventory schedules as necessary.	**Incorrect Reference:** S/B: 45.602-1(a)	
13.	(c) FAR 52.245-1(f)(1)(ii) requires contractors to receive, record, identify and manage Government property.	(ii) *Receipt of Government Property.* The Contractor shall receive Government property and document the receipt, record the	

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		information necessary to meet the record requirements of paragraph (f)(1)(iii)(A)(*1*) through (*5*) of this clause, identify as Government owned in a manner appropriate to the type of property (*e.g.*, stamp, tag, mark, or other identification), and manage any discrepancies incident to shipment.	
14.	(d) FAR 52.245-1(f)(1)(iii) requires contractors to create and maintain records of all Government property accountable to the contract.	(iii) *Records of Government property.* The Contractor shall create and maintain records of all Government property accountable to the contract, including Government-furnished and Contractor-acquired property. (A) Property records shall enable a complete, current, auditable record of all transactions and shall, unless otherwise approved by the Property Administrator, contain the following: (1) The name, part number and description, National Stock Number (if needed for additional item identification tracking and/or disposition), and other data elements as necessary and required in accordance with the terms and conditions of the contract. (2) Quantity received (or fabricated), issued, and balance-on-hand. (3) Unit acquisition cost. (4) Unique-item identifier or equivalent (if available and necessary for	Duplicate or triplicate records are maintained to support contractor process; CAV, TAV, etc. processes and now for UID reporting due to the changes in the reporting clause of Government property. New records are required to support contractor self assessments, which are not adequately being used by the government for property management system analyses.

	Information Collection	Correction or clarification	Comments
		individual item tracking). (5) Unit of measure. (6) Accountable contract number or equivalent code designation. (7) Location. (8) Disposition. (9) Posting reference and date of transaction. (10) Date placed in service (if required in accordance with the terms and conditions of the contract). (B) *Use of a Receipt and Issue System for Government Material.* When approved by the Property Administrator, the Contractor may maintain, in lieu of formal property records, a file of appropriately cross-referenced documents evidencing receipt, issue, and use of material that is issued for immediate consumption.	This restriction on receipt and issues causes a lot of unnecessary paperwork and should be eliminated as this cause the proliferation of stockrooms. In a perfect world based upon "lean" practices all acquisitions are receipt and issue; material stockrooms are eliminated – requiring material stockrooms drive additional paperwork, delays, movement and space. Items must be entered into the stock room inventory system, a system must be developed to check out items in the stockroom, people must be present to oversee and manage the stockroom including inventories…. Processes and practices should be in place to minimize stockrooms.
15	(e) FAR 52.245-1(f) (1) (iv) requires contractors to periodically perform, record, and report physical inventories during contract performance.	iv) *Physical inventory*. The Contractor shall periodically perform, record, and disclose physical inventory results. A final physical inventory shall be performed upon contract completion or termination. The Property	Inventories are a validation of records – inventories should be conducted based upon the need to improve records rather than an arbitrary schedule. Inventories are labor intensive and expensive. Statistical techniques are reliable and

	Information Collection	Correction or clarification	Comments
		Administrator may waive this final inventory requirement, depending on the circumstances (*e.g.*, overall reliability of the Contractor's system or the property is to be transferred to a follow-on contract).	should be used to determine the need for a full inventory.
16	(f) FAR 52.245-1(f) (1) (vi) requires contractors to have a process to create and provide reports.	(vi) *Reports*. The Contractor shall have a process to create and provide reports of discrepancies; loss, damage, destruction, or theft; physical inventory results; audits and self-assessments; corrective actions; and other property related reports as directed by the Contracting Officer.	Duplicated reporting is required due to the change in the reporting clause of Government property. New reports are required to support contractor self assessments, which are not being used by the government for property management system analyses.
17	(g) FAR 52.245-1(f)(1)(viii) requires contractors to promptly disclose and report Government Property in its possession that is excess to contract performance.	viii) *Utilizing Government property*. (A) The Contractor shall utilize, consume, move, and store Government Property only as authorized under this contract. The Contractor shall promptly disclose and report Government property in its possession that is excess to contract performance.	
18	(h) FAR 52.245-1(f)(1)(ix) requires contractors to disclose and report to the Property Administrator the need for replacement and/or capital rehabilitation.	(ix) *Maintenance*. The Contractor shall properly maintain Government property. The Contractor's maintenance program shall enable the identification, disclosure, and performance of normal and routine preventative maintenance and repair. The Contractor shall disclose and report to the Property Administrator the need for replacement and/or capital rehabilitation.	
19	(i) FAR 52.245-1(f)(1)(x) requires contractors to perform and report to the Property Administrator	(x) *Property closeout*. The Contractor shall promptly perform and report to the	Contract closeout should not be contingent upon disposal of all Government property under the

	Information Collection	Correction or clarification	Comments
	contract property closeout.	Property Administrator contract property closeout, to include reporting, investigating and securing closure of all loss of Government property cases; physically inventorying all property upon termination or completion of this contract; and disposing of items at the time they are determined to be excess to contractual needs.	contract. Government property is Government property and there is no benefit to the Government or the contractor when there are no direct charge actions. This restriction causes unnecessary delays and administrative costs.
20	(j) FAR 52.245-1(f)(2) requires contractors to establish and maintain source data, particularly in the areas of recognition of acquisitions and dispositions of material and equipment.	2) The Contractor shall establish and maintain Government accounting source data, as may be required by this contract, particularly in the areas of recognition of acquisitions, loss of Government property, and disposition of material and equipment.	
21	(k) FAR 52.245-1(j)(4) requires contractors to submit inventory disposal schedules to the Plant Clearance Officer.	**Incorrect Reference. Should be 52.245-1(j) (2)** (2) *Inventory disposal schedules*. (i) Absent separate contract terms and conditions for property disposition, and provided the property was not reutilized, transferred, or otherwise disposed of, the Contractor, as directed by the Plant Clearance Officer or authorizing official, **shall use Standard Form 1428, Inventory Disposal Schedule or electronic equivalent, to identify and report—**	
22	(l) FAR 52.245-9(d) requires a contractor to identify the property for which rental is requested.	(d) General. (1) Rental requests shall be submitted to the Administrative Contracting Officer (ACO),	

	Information Collection	Correction or clarification	Comments
		identify the property for which rental is requested, propose a rental period, and compute an estimated rental charge by using the Contractor's best estimate of rental time in the formulae described in paragraph (e) of this clause.	
23	B. Annual Reporting Burden The estimated number of respondents published in the Federal Register at 76 FR 18497, on April 4, 2011 was incorrectly stated at 4,875 rather than 14,875. This is corrected, and as a result, the estimated total burden hours is revised to 4,350,650. These estimated total burden hours are lower than the previously approved estimated total burden hours of 6,226,350. The estimated total burden hours are lower because the amendments under FAR Case 2010-009 removed the requirement for Government approval of contractor scrap procedures, and submission of inventory schedules and scrap lists from a contractor without scrap procedurs, prior to allowing the contractor to dispose of ordinary production scrap. The practice unnecessarily burdened contractors that generated small amounts of scrap.		The estimated total burden hours is grossly underestimated. A better estimate is two hours per item of tagged property per year. Then an equivalent amount for government material. The IUID registry currently contains about ten percent of the equipment tagged property located at contractor's sites under DoD contracts. The amount of non-DoD property will have to be estimated proportional to DoD property.
24	Number of Respondents: 14,875. Responses per Respondent: 910.267. Total Responses: 13,540,225. Average Burden Hours per Response: .3213. Total Burden Hours: 4,350,650.		These numbers appear grossly underestimated in the same proportion of as the estimates above.
25	Obtaining Copies of Proposals: Requesters may obtain a copy of the		

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	information collection documents from the General Services Administration, Regulatory Secretariat (MVCB), 1275 First Street NE., Washington, DC 20417, telephone (202) 501-4755. Please cite OMB Control No. 9000-0075, Government Property, in all correspondence.		
26	Dated: August 17, 2012. William Clark, Acting Director, Federal Acquisition Policy Division, Office of Governmentwide Acquisition Policy, Office of Acquisition Policy, Office of Govenrmentwide Policy. [FR Doc. 2012-20741 Filed 8-22-12; 8:45 am] BILLING CODE 6820-EP-P		