

PUBLIC SUBMISSION

As of: 4/16/15 11:06 AM
Received: April 09, 2015
Status: Draft
Tracking No. 1jz-8i74-dzp2
Comments Due: May 04, 2015
Submission Type: Web

Docket: GSA-GSAR-2014-0020

General Services Administration Acquisition Regulation (GSAR); Transactional Data Reporting; GSAR Case 2013-G504

Comment On: GSA-GSAR-2014-0020-0001

General Services Administration Acquisition Regulations: Transactional Data Reporting; GSAR Case 2013-G504

Document: GSA-GSAR-2014-0020-DRAFT-0005

Comment on FR Doc # 2015-04349

Submitter Information

Name: Stephen Roadfeldt

Address:

7900 Cleveland Drive

Punta Gorda, FL, 33982

Email: stephen.roadfeldt@shepra.com

General Comment

- 1) Reporting Burden: It seems to me that the burden for these requirements is just an estimate with no basis in fact. Collection of data internally for reporting, connection or site issues, etc. The time for smaller companies with manual systems could take a lot longer pulling data from their contract files to submit.
- 2) Contractors already provide detailed invoices to the Government making a call against the schedules.
- 3) Who is paying for this additional burden? Contractors should be able to bill GSA for the labor to accomplish this additional burden as part of entering the data. This would provide GSA the true burden/cost.
- 4) For Services: prices previously paid by other government buyers for a similar product or service under similar terms and conditions; how do you plan on capturing similar services, conditions and terms? In FFP contracts risk is a factor and based on each companys experience assesses the risk differently.
- 5) What cant you get out FPDS? Why are you setting up another system to burden the contractors providing Services? It is a Government internal reporting requirement and the Government should, if necessary modify and use their existing system FPDS to collect the data needed from our invoices. What about DoD Wide Area Work Flow as a feed to FPDS?