

August 19, 2004

Ms. Donna Hairston-Benford  
OUSD (AT&L) DPAP(DAR), IMD 3C132  
3062 Defense Pentagon  
Washington, DC 20301-3062

Subject: Information Collection Requirements; Defense Federal Acquisition  
Regulation Supplement; Small Business Programs.

Reference: OMB Control Number 0704-0386  
69 FR 129, Friday, July 7, 2004.

Dear Ms. Hairston-Benford:

The Boeing Company has completed an internal review of the subject Information Collection Requirement; Defense Federal Acquisition Regulation Supplement; Small Business Programs, with request for comments that was published in the Federal Register on Wednesday, July 7, 2004 (69 FR 129.) We appreciate the opportunity to provide comments to the DoD.

### **Comments**

#### **Question:**

- (a) Whether the proposed collection of information is necessary for the proper performance of the functions of DoD, including whether the information will have practical utility?

**Response:** The Boeing Company does not currently provide this information because we operate under the rules and guidelines of the Comprehensive Subcontracting Plan Test Program. Our position is that the collection of this information is not necessary and does little to assist the DoD in assessing contractor compliance with the DFARS. Rather than establish this as a requirement, perhaps it could simply be addressed during regular DCMA reviews.

#### **Question:**

- (b) The accuracy of the estimate of the burden of the proposed information collection?

**Response:** We believe that contractors would require considerable resources, both people and paperwork, to collect and report this information. We have not



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had an opportunity to conduct the necessary time studies to provide a more comprehensive response

**Question:**

(c) Ways to enhance the quality, utility and clarity of the information to be collected?

**Response:** Possibly an automated process whereby individual subcontracting plans, complete with supplier names are contained in a database where it would be easier to submit a change. But this just reduces that paperwork. The manual effort to keep track of all changes still remains. The DoD must decide what it is actually going to do with all this information. We don't think it is practical for DoD to actually use the updates to better assess contractor compliance.

**Question:**

(d) Ways to minimize the burden of the information collection on respondents, including the use of automated collection techniques or other forms of information technology?

**Response:** Any automation technique would need to be tied to the contractors own data repository so that contractor personnel do not have to make input to multiple databases. Ideally you'd like the suppliers to update their own information but many would not know that they are listed in a contractor's subcontracting plan and/or that the contractor intends to substitute a SB, SDB or WOSB with a supplier that is not in these categories. Also, since primes have common suppliers, there is the potential of duplicating efforts in providing such data

Should you have any comments or questions or require any future assistance, please contact Mark Olague at 253-773-2173 or the undersigned at 312-562-2862.

Sincerely,



Warren L. Reece  
Director, Contract Policy & Process