



August 11, 2003

Defense Acquisition Regulations Council  
Attn: Ms. Susan Schneider  
OUSD (AT&L) DPAP (DAR)  
IMD 3C132, 3062 Defense Pentagon  
Washington, DC 20301-3062

Dear Ms. Schneider:

The Aerospace Industries Association appreciates the opportunity to provide comments on the use of DoD activity address codes in the first six positions in solicitation and contract numbers, instead of the current practice of using DoD activity address numbers in the first six positions (DFARS Case 2003-D005). We have several questions and observations on the proposed rule:

- Does DoD plan to change the numbers of any existing contracts? DoD has numerous long term contracts that will exist for many years and will be modified frequently until closeout. We presume that modifications to these long term contracts would be required to continue to carry the basic contract number. Consequently if these contract numbers are not changed, the maintenance of DFARS Appendix G could not be eliminated since those numbers will continue to be used until all existing contracts are closed out. These contract numbers are not only used in contracts, but also on invoices, DD250s, etc.
- If the numbers of these long term contracts are changed, there could be substantial confusion inasmuch as exiting management systems for tracking contract activity would have to be changed as well. Changing the numbers will require a well thought out transition plan.
- Some military bases have multiple DODAAC codes. We assume DoD will publish a list of which ones will be used to identify the contracts.
- We recommend that the DODAAC codes be maintained with the same rigor as the DODAAN codes so as to assure that shipments and payments are not delayed.

If there are any questions or if we can be of further assistance, please contact me at (703) 358-1045.

Sincerely,

A handwritten signature in black ink that reads 'Patrick D. Sullivan'.

Patrick D. Sullivan  
Assistant Vice President  
Procurement and Finance