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January 8, 2004

Mrs. Karen Fischetti  
OUSD(AT&L)DPAP(DAR)  
IMD 3C132  
3062 Defense Pentagon,  
Washington, DC 20301-3062

Subject: Information Collection Requirement; Defense Federal Acquisition Regulation Supplement; DoD Pilot Mentor-Protégé Program.

OMB Control Number 0704-0332

Dear Mrs. Fischetti:

The Boeing Company has completed an internal review of the subject information collection requirement with request for comment that was published in the Federal Register on Friday, November 7, 2003. (68 FR 63072) We appreciate the opportunity to provide comments to Department of Defense.

As you are aware, in compliance with section 3506(c)(2)(A) of the Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35), DoD has announced the proposed extension of a public information collection requirement and sought public comment on the provisions thereof. DoD has invited comments on several issues: First, 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; Second, the accuracy of the estimate of the burden of the proposed information collection; Third, ways to enhance the quality, utility, and clarity of the information to be collected; and Finally, ways to minimize the burden of the information collection on respondents, including the use of automated collection techniques or other forms of information technology. The Office of Management and Budget (OMB) has currently approved this information collection for use through March 31, 2004. DoD proposes that OMB extend its approval for three additional years to March 31, 2007.

The Boeing Company offers the following detailed responses in reply to the questions posed to the public by the Department of Defense:

1.) Question: 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?

Reply:

We agree that the proposed collection of information is necessary for the performance of the functions of the DoD. The information does have practical utility in documenting and monitoring the performance of the Mentor-Protégé agreements.

2.) Question: What is the accuracy of the estimate of the burden of the proposed information collection?

Reply:



We agree that it would take approximately 1 hour to complete the semi-annual report after all the data has been collected. If the 3.7 hours of record keeping is meant to include information/data collection, then that may be a low estimate. With larger companies, there is more time expended coordinating with the various departments for the necessary information/data than smaller companies. The protégé also incurs some burden to furnish the necessary information in the format specified by the semi-annual report. The burden of information collection should also take into consideration the time in preparing the SF295 since some of the information required is taken directly from this form.

3.) Question: What are ways to enhance the quality, utility, and clarity of the information to be collected?

Reply:

All of the agencies should be consistent with the DoD instructions for completing the semi-annual report. For example, one agency states that the protégé concurrence/non-concurrence (block 45) is mandatory for the October report and optional for the April report. DoD semi-annual report instructions and DFARS Appendix I do not reflect this.

4.) Question: What are ways to minimize the burden of the information collection on respondents, including the use of automated collection techniques or other forms of information technology?

Reply:

One suggestion to minimize the burden of information collection would be to modify the semi-annual report, part II: return on investment, subsection B, to attach the most recent SF295 submitted. Calculating the subcontract awards to small disadvantaged businesses (SDB's) (and percentage of total from the start of the agreement, fiscal year to date and cumulative from start of agreement appears to be an exercise in math and does not affect the outcomes of the individual Mentor-Protégé agreements.

Instructions should include provisions to distribute semi-annual reports electronically to appropriate departments/agencies that will allow electronic collection of reports. Also, it would be beneficial to receive acknowledgment that the semi-annual reports were received.

Thank you for the opportunity to provide our comments. If there are any questions, or we can be of further assistance, please contact the Mark Olague at (253) 773-2173 or Warren Reece at telephone (312) 544-2862.

Sincerely,

*for*   
Mark A. Olague  
Pamela A. McInerney  
Director, Contract Policy