



February 21, 2006

Defense Acquisition Regulations System  
ATTN: Mr. Bill Sain  
OUSD (AT&L) DPAP (DAR)  
IMD 3C132  
3062 Defense Pentagon  
Washington, DC 20301-3062

Subject: Proposed Rule to Relocate Text re Weighted Guidelines  
Procedures from the DFARS into DOD's Procedures,  
Guidance, and Information (PGI) Companion Resource  
DFARS Case 2003-D014

Dear Mr. Sain:

The Aerospace Industries Association (AIA) is pleased to submit comments in response to the proposed rule which, among other things, would relocate text on Weighted Guidelines procedures from the Defense Federal Acquisition Regulation Supplement (DFARS) into DOD's Procedures, Guidance, and Information (PGI) companion resource (DFARS Case 2003-D014).

The justification stated for this proposed rule is that this is a result of a transformation initiative undertaken by the Department of Defense (DOD) to dramatically change the purpose and content of the DFARS and improve the efficiency and effectiveness of the acquisition process. "The transformed DFARS will contain only requirements of law, DOD-wide policies, delegations of FAR authorities, deviations from FAR requirements, and policies/procedures that have a significant effect beyond the internal operating procedures of DOD or a significant cost or administrative impact on contractors or offerors."

We disagree with the assertion that removal of guidance on the Weighted Guidelines procedures from DFARS Subpart 215.4 is justified because that guidance has no significant impact beyond the internal operating procedures of the Department. Contracting officers must use a structured approach for developing a pre-negotiation profit or fee objective when cost or pricing data is obtained. Additionally, weighted guidelines often have an impact when cost or pricing data is not obtained, because contracting officers use the tool to establish their expectations on appropriate profit objectives for procurements that do not require certification under the Truth in Negotiations Act. Hence, the considerations used to develop those objectives have a significant impact on industry and must be retained in the DFARS—where proposed

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changes will continue to be subject to publication for public comment. Accordingly, we ask that the text on Weighted Guidelines procedures in DFARS Subpart 215.4 be retained in the DFARS.

We appreciate the opportunity to provide our comments. If you have any questions concerning our comments or recommendation, please contact me at 703-358-1045 or [elaine.guth@aia-aerospace.org](mailto:elaine.guth@aia-aerospace.org). Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Elaine J. Guth".

Elaine J. Guth  
Assistant Vice President  
Procurement and Finance