



June 22, 2005

via e-mail to dfars@osd.mil

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

Re: Defense Federal Acquisition Regulation Supplement; Radio Frequency Identification, 48 CFR Parts 211, 212, and 252 [DFARS Case 2004-D011]

The Glass Packaging Institute (GPI) is submitting these comments in response to the Federal Register notice referenced above. GPI is the association of companies that manufacture glass containers for use in the beverage, food and related markets. Glass manufacturers depend on a reliable supply of glass cullet (recycled glass containers) to produce new glass containers. This cullet supply must be free of contaminants such as ceramics, pyrex, various metals and other materials. Since RFID tags would be affixed to containers or pallets, they could be a source of contamination when the containers or pallets are processed for recycling.

The proposed amendments to the Defense Federal Acquisition Regulation Supplement (DFARS) relate to requirements for contractors to affix passive RFID tags at the case and palletized unit level with a focus on corrugated, metal and plastic containers. GPI does not believe that these requirements will have an immediate impact on glass container manufacturers, as the glass containers produced by our members are not utilized at the container or pallet level. However, since the Department of Defense is at the forefront of organizations that are mandating RFID use by suppliers, GPI believes that it is critical that the Department adopt an RFID-use mandate only if it is certain that the applicable RFID technologies will not have a negative impact on recycling for any container, package or pallet producer, or for any industry that utilizes the recycled containers or pallets to produce other products.

GPI is reviewing the potential impact of RFID tags that might be used at the glass container level; however, that review will not directly impact on the use of tags for cases or pallets. We urge the Department to carefully analyze the use of RFID tags for each type of container where the Department plans to mandate RFID use. If DoD considers mandates for RFID tag usage for glass containers in the future, we urge the Department to work with GPI to insure that such a mandate does not hamper the ability of glass manufacturers to access glass cullet that is free of contaminants.

GPI appreciates the opportunity to provide these comments. Please contact me at 703-684-6359 if you have any questions regarding our comments.

Sincerely,

A handwritten signature in black ink that reads "Andrew Bopp". The signature is written in a cursive, slightly slanted style.

Andrew Bopp
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