



Independent  
Office Products &  
Furniture Dealers  
Association

June 24, 2002

Ms. Susan Schneider  
OUSD (AT&L) DP (DAR)  
IMD 3C132  
3062 Defense Pentagon  
Washington, D.C. 20301-3062

Re: DFARS Case 2002-D003  
Defense Federal Acquisition Regulation Supplement (DFARS)  
Implementation of Section 811 of the Fiscal Year 2002 National Defense Authorization Act

Dear Ms. Schneider:

The following comments are being submitted on behalf of the Independent Office Products & Furniture Dealers Association (IOPFDA), regarding the interim rule amending the Defense Federal Acquisition Regulation Supplement (DFARS) to implement Section 811 of the Fiscal Year 2002 National Defense Authorization Act.

These comments focus on the issues of market research, the competition process, defining the intent of Congress, and addressing the issue of micro-purchases.

As an industry which has been hit very hard by the current regulations governing the way Federal Prison Industries operates, we believe implementation of Section 811 is important because for the first time since FPI's inception, we will have an opportunity to compete fairly for government business. This can only happen if there are modifications made to the current interim rule.

The interim rule states "Section 811 requires DoD to conduct market research before purchasing a product listed in the FPI catalog, to determine whether the FPI product is comparable in price, quality, and time of delivery to products available from the private sector." The final rule should give contracting officers as much flexibility as they need to purchase goods for the Department of Defense. We believe contracting officers should not have their hands tied when procuring goods by narrow definitions of "comparable", "quality", and "delivery time". The final rule should include language, which leaves it up to the contracting