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February 27, 2004

VIA INTERNET SUBMISSION

Defense Acquisition Regulations Council
Attn: Mr. Steven Cohen
OUSD(AT&L)DPAP(DAR)
IMD 3C132
3062 Defense Pentagon
Washington, D.C. 20301-3062

RE: DFARS Case 2003-D081;
Comments from Lucent Technologies Inc.

Dear Mr. Cohen:

Lucent Technologies Inc. respectfully submits the following comments on the Department of Defense's interim rule concerning Unique Item Identification and Valuation, 68 Fed. Reg. 75196-75202 (Dec. 30, 2003). The individual comments are set forth on the attached pages.

We appreciate the opportunity to comment on the interim rule and look forward to the Department's responses. Please feel free to contact me at the e-mail address or phone numbers listed above if you have any questions about the attached comments. In addition, you may contact David Hollesen in Lucent's Logistics Quality and Barcode Standards Group at hollesen@lucent.com or (732) 949-7739.

Sincerely,

Michael Garson
LUCENT TECHNOLOGIES BELL LABS
GOVERNMENT SOLUTIONS

Attachment



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**DFARS Case 2003–D081;
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1. Considering that the new UID labeling requirement allows for the use of commonly accepted commercial marks for items that are not required to have unique identification (i.e., for items that do not have a unit acquisition cost of \$5,000 or more), will the Department of Defense (DoD) reconsider the application of the UID labeling requirement to contracts for commercial items under FAR part 12?
2. Is it the DoD's intention to apply the UID labeling requirement to product orders placed under another agency's contract vehicle, such as GSA's Federal Supply Schedule or another agency's multiple award, IDIQ contract?
3. Does the UID labeling requirement apply to entities that resell a manufacturer's product to the DoD?
4. Does the DoD recognize Telcordia as an issuing agency?
5. Will the DoD accept the UID in a MicroPDF417 symbol? The majority of North American Telecommunications Service Providers require equipment manufacturers to CLEI Code their products. Telcordia GR-383-CORE identifies MicroPDF417 as the required symbology for CLEI Coded product. We currently use MicroPDF417 in our designs and would require significant changes to implement Data Matrix 200. There is not sufficient space for two symbols, particularly when both will have the same information. The MH10.8.3 and MH10.8.2 data syntax will be the same for both symbologies. MicroPDF417 has the benefit of being either square or rectangular in shape depending on how it is specified. This provides increased flexibility when working with space-constrained product. Scanners capable of reading Data Matrix 200 are also capable of reading MicroPDF417, but scanners capable of reading MicroPDF417 are not always capable of reading Data Matrix 200.
6. Is the part number required in the 2D symbol if we use serialization within the enterprise identifier? The examples we see for serialization within the enterprise are not clear. We will be using data identifier 18V, ANSIT1.220 issuing agency "LB", an enterprise identifier of "WECO". The serial number will use the data identifier "S" to define our unique serial number to form the UID.
Do the data strings shown below meet the UID requirement?



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CLEI coded product.

$D >^R_s 06^G_s 18VLBWECO^G_s S123456789012345678^G_s 11PAABBCCD1E1^R_s E^E O_T$.

Non-CLEI coded product:

$D >^R_s 06^G_s 18VLBWECO^G_s S123456789012345678^R_s E^E O_T$.

7. Does the order of the data fields matter? Telcordia has defined the CLEI Code as the first data field within the data symbol and that is our current data format. Is the use of data identifiers sufficient to assemble the UID from the data string regardless of order?
8. Must the UID label be scannable in service? If so, what exceptions would be considered?
9. Will the DoD require that circuit packs, returned for warranty, repair, or service, be replaced with packs that have a UID label? Warranty, service, and repair packs are managed from refurbished product inventory and are subject to continuous turnover from the embedded base of circuit packs. These circuit packs have legacy product labeling on them and not a UID. Requiring a UID on warranty packs would add significant cost to the warranty, service, and repair process. This would require all products maintained to support warranty, service, and repair, which are also sold to the DoD, to be relabeled with a UID. This would be an ongoing process for many years and would involve many thousands of packs.
10. What is the labeling requirement for the first level product package label (P2 label)? Will this label require the UID be encoded in a 2D symbol? If so would this be a PDF417 symbol, Data Matrix 200, or other?
11. What is the minimum data set for the UID on the shipping label and is a 2D symbol required? We currently do not include product serial number information on our shipping labels. Adding UID information to the shipping label would require significant IT system changes.
12. Is it intended that MIL-STD-129 require the use of RFID technology on shipping containers?
 - at what level of packaging will the RFID tag be required?
 - what is the timeline for requiring the use of RFID for shipping containers?
13. Is it intended that MIL-STD-130 require RFID for product level identification? If so, by what future time frame would this be required?