

COUNCIL OF DEFENSE AND SPACE INDUSTRY ASSOCIATIONS

2111 Wilson Boulevard, Suite 400

Arlington, VA 22201

(703) 247-9490

July 12, 1999

CODSIA Case No. 9-99

Ms. Laurie Duarte
General Services Administration
FAR Secretariat (MVR)
1800 F Street, NW
Room 4035
Washington, DC 20405

Re: Federal Acquisition Regulation; Pollution Control and Clean Air and Water
[FAR Case 97-033]

Dear Ms. Duarte:

The undersigned members of the Council of Defense and Space Industry Associations (CODSIA) appreciate the opportunity to offer comments on FAR Case 97-033, published in the *Federal Register* on May 13, 1999 (Vol. 64, No. 92). Formed in 1964 by industry associations with common interests in the defense and space fields, CODSIA is currently composed of eight associations representing over 4,000 member companies across the nation. Participation in CODSIA projects is strictly voluntary. A decision by any member association to abstain from participating in a particular activity is not necessarily an indication of dissent.

After reviewing the proposed changes under FAR Case 97-033, CODSIA members wish to endorse the proposal, which will amend the FAR by removing FAR Subpart 23.1, 52.223-1, and 52.223-2. This action will relieve an unnecessary paperwork burden on offerors and bidders.

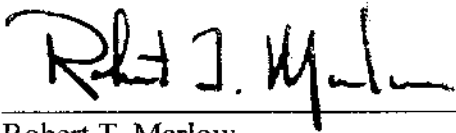
CODSIA members support the concept that facilities convicted of knowing criminal violations of the Clean Air Act or the Clean Water Act not be eligible for use under government contracts until the causes of violations have been corrected. Thus, EPA's plan to improve its information on criminal violators of the two acts is welcomed.

We also wish to emphasize that member companies of CODSIA associations are committed to compliance in their operations and believe that this should be a common standard for all suppliers. Further, as government suppliers, we support the greatest use of existing Federal laws and regulations (e.g., EPA and OSHA) and the elimination of additional requirements in the FAR that are redundant or unnecessary, as is the case here.

Ms. Laurie Duarte
July 12, 1999
Page 2

We appreciate the opportunity to comment on this proposal.

Sincerely,



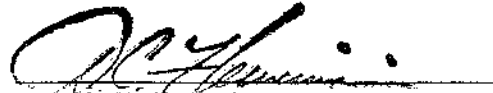
Robert T. Marlow
Vice President, Government Division
Aerospace Industries Association



Lorraine M. Lavet
Chief Operating Officer
American Electronics Association



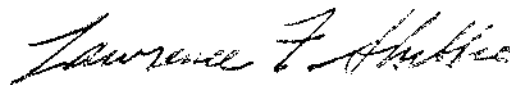
Gary D. Engebretson
President
Contract Services Association



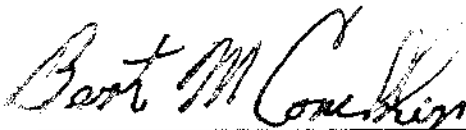
Dan C. Heinemeier
President, GEIA
Electronic Industries Alliance



Kenneth McLennan
President
Manufacturers Alliance/MAPI



Lawrence F. Skibbie
President
National Defense Industrial
Association



Bert M. Concklin
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