

**COUNCIL OF DEFENSE AND SPACE INDUSTRY ASSOCIATIONS**

**2111 Wilson Boulevard, Suite 400**

**Arlington, VA 22201**

**www.codsia.org**

**(703) 247-9490**

September 28, 2001

CODSIA Case 11-01

Ms. Sandra Haberlin  
Defense Acquisition Regulations Council  
OUSD (AT&L) DP (DAR), IMD 3C132  
3062 Defense Pentagon  
Washington, D.C. 20301-3062

RE: DFARS Case 2001-D012, Customary Progress Payment Rate for Large Business Concerns

Dear Ms. Haberlin:

The undersigned members of the Council of Defense and Space Industry Associations (CODSIA) appreciate the opportunity to comment on the proposed DFARS rule concerning the customary progress payment rate for large business concerns that was published in the *Federal Register* on August 24, 2001 (66 Fed. Reg. 44588).

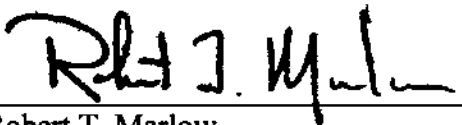
Formed in 1964 by industry associations with common interests in the defense and space fields, CODSIA is currently composed of eight associations representing over 4,000 firms across the nation who employ the preponderance of the two million men and women in the space and defense industry. Participation 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.

CODSIA members support the proposed DFARS rule. The alignment of DOD's progress payment rate with other federal agencies is a step in the right direction toward ensuring that DOD contractors have the same economic flexibility and cash flow potential as the rest of the federal marketplace.

Again, thank you for the opportunity to provide these comments. If you have any questions, please contact CODSIA Project Officer Grant Thorpe at (703) 968-2246.

Sincerely,

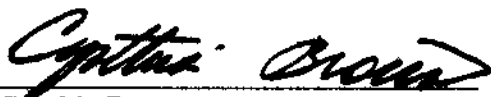
(SEE ATTACHED CODSIA SIGNATORIES)



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



Lorraine M. Lavet  
Chief Operating Officer  
American Electronics Association



Cynthia Brown  
President  
American Shipbuilding Association



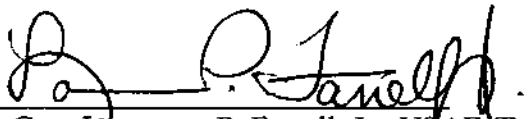
Gary D. Engstrom  
President  
Contract Services Association



Dan C. Heinemeier  
President, GEIA  
Electronic Industries Alliance



Thomas J. Duesterberg  
President and CEO  
Manufacturers Alliance/MAPI



Lt. Gen. Lawrence P. Farrell, Jr., USAF (Ret.)  
President and CEO  
National Defense Industrial Association



Charles H. Cantus  
Vice President, Government Relations  
Professional Services Council