

MEMORANDUM FOR RONALD POUSSARD
DIRECTOR
DEFENSE ACQUISITION REGULATIONS COUNCIL

FROM: RODNEY P. LANTIER
DIRECTOR
REGULATORY SECRETARIAT AND FEDERAL ASSISTANCE
PUBLICATIONS DIVISION

SUBJECT: FAR Case 2002-011, Procurement of Printing and Duplicating
Through the Government Printing Office

Attached are comments received on the subject FAR case published at 67 FR 68914;
November 13, 2002. The comment closing date is December 13, 2002.

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1	11/06/02	11/06/02	Judy Kelly
2002-011-2	11/14/02	11/14/02	Becky Byrum
2002-011-3	11/14/02	11/14/02	Eric Johnson
2002-011-4	11/14/02	11/14/02	Susan Lyons
2002-011-5	11/14/02	11/14/02	Ruth McNaught
2002-011-6	11/14/02	11/14/02	Dierdre Freamon
2002-011-7	11/13/02	11/13/02	Diane VanderPol
2002-011-8	11/13/02	11/13/02	Sharon Partridge
2002-011-9	11/13/02	11/13/02	Nicole Merriman
2002-011-10	11/13/02	11/13/02	Vicki Tate

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-11	11/08/02	11/08/02	Gayle Locke
2002-011-12	11/07/02	11/07/02	Carol Kira
2002-011-13	11/08/02	11/08/02	Michael Guy
2002-011-14	11/18/02	11/18/02	Louise Treff-Gangler
2002-011-15	11/18/02	11/18/02	Paul A. Arrigo
2002-011-16	11/18/02	11/18/02	Chuck Malone
2002-011-17	11/18/02	11/18/02	Mark Newcastle
2002-011-18	11/20/02	11/20/02	Jack Ferrell
2002-011-19	11/20/02	11/20/02	Lori Smith
2002-011-20	11/21/02	11/21/02	Bill Sleeman
2002-011-21	11/21/02	11/21/02	Catherine Johnson
2002-011-22	11/21/02	11/21/02	Astroek
2002-011-23	11/22/02	11/22/02	John L. Howard, Jr.
2002-011-24	11/23/02	11/23/02	Robert C. Williford
2002-011-25	11/25/02	11/25/02	Doug Ernest
2002-011-26	11/25/02	11/25/02	Stafford C. Lang
2002-011-27	11/25/02	11/25/02	Bert Chapman

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-28	11/26/02	11/26/02	Carl R. Culham
2002-011-29	11/26/02	11/26/02	Eric Dahlen
2002-011-30	11/27/02	11/27/02	Steve Marquardt
2002-011-31	11/28/02	11/28/02	Anton Weck
2002-011-32	11/28/02	11/28/02	David Berry
2002-011-33	11/28/02	11/28/02	Mike Carlson
2002-011-34	11/28/02	11/28/02	Dennis Wendorf
2002-011-35	11/28/02	11/28/02	Chris Adams
2002-011-36	11/28/02	11/28/02	Paul Schreiber
2002-011-37	11/28/02	11/28/02	Douglas Welch
2002-011-38	11/28/02	11/28/02	Adam Stewart
2001-011-39	11/28/02	11/28/02	Andrew Patton
2002-011-40	11/28/02	11/28/02	Jay Joslin
2002-011-41	11/28/02	11/28/02	Adrian P. Sinnott
2002-011-42	11/28/02	11/28/02	Chris Stehlik
2002-011-43	11/28/02	11/28/02	Richard Satterfield
2002-011-44	11/28/02	11/28/02	Aslak Evang
2002-011-45	11/28/02	11/28/02	Ilan rabinovitch
2002-011-46	11/28/02	11/28/02	John Osgood
2002-011-47	11/28/02	11/28/02	Florian Hines
2002-011-48	11/28/02	11/28/02	Pedro Ruvera-Torres

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-49	11/28/02	11/28/02	Jonah Petri
2002-011-50	11/28/02	11/28/02	Max Rible
2002-011-51	11/28/02	11/28/02	Charles Williams
2002-011-52	11/28/02	11/28/02	Tom Mitchell
2002-011-53	11/28/02	11/28/02	Max Jurach
2002-011-54	11/28/02	11/28/02	Jim Glen
2002-011-55	11/28/02	11/28/02	Billy Smith
2002-011-56	11/28/02	11/28/02	Donna Jean Marsula
2002-011-57	11/28/02	11/28/02	Ron Lauzon
2002-011-58	11/28/02	11/28/02	Mike Rodak
2002-011-59	11/28/02	11/28/02	Tague Griffith
2002-011-60	11/28/02	11/28/02	Tom Ballingall
2002-011-61	11/28/02	11/28/02	Travis Shulka
2002-011-62	11/28/02	11/28/02	Michael Fischer
2002-011-63	11/28/02	11/28/02	Thomas Tordel, Jr.
2002-011-64	11/28/02	11/28/02	Julio Mandojana
2002-011-65	11/28/02	11/28/02	Michael Andrzejewski
2002-011-66	11/28/02	11/28/02	Kevin Owen
2002-011-67	11/28/02	11/28/02	James Higgs
2002-011-68	11/28/02	11/28/02	James Grimaldi

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-69	11/28/02	11/28/02	David Solomon
2002-011-70	11/28/02	11/28/02	Randy Wieck
2002-011-71	11/28/02	11/28/02	Gernot Krobath
2002-011-72	11/28/02	11/28/02	John Lynch
2002-011-73	11/28/02	11/28/02	Michael Miller
2002-011-74	11/28/02	11/28/02	Jay Anderson
2002-011-75	11/28/02	11/28/02	Andrew Cripps
2002-011-76	11/28/02	11/28/02	Devon Bowen
2002-011-77	11/28/02	11/28/02	Jack Paxton
2002-011-78	11/28/02	11/28/02	James Willeke
2002-011-79	11/28/02	11/28/02	John Apa
2002-011-80	11/28/02	11/28/02	Michael McDermott
2002-011-81	11/28/02	11/28/02	Steve Talbot
2002-011-82	11/28/02	11/28/02	Chris Stone
2002-011-83	11/28/02	11/28/02	Nathan Tuck
2002-011-84	11/28/02	11/28/02	Sam Morgan
2002-011-85	11/28/02	11/28/02	Ross Pincus
2002-011-86	11/28/02	11/28/02	Lloyd Tolbert
2002-011-87	11/28/02	11/28/02	Michael Semones
2002-011-88	11/28/02	11/28/02	Steve Pelletier

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-89	11/28/02	11/28/02	Lisa Cheney
2002-011-90	11/28/02	11/28/02	Brian Schuitema
2002-011-91	11/28/02	11/28/02	John Sadler
2002-011-92	11/28/02	11/28/02	John Nerad
2002-011-93	11/28/02	11/28/02	George Robinson
2002-011-94	11/28/02	11/28/02	M. Magee
2002-011-95	11/28/02	11/28/02	Wayne Eaker
2002-011-96	11/28/02	11/28/02	Scott Quigley
2002-011-97	11/28/02	11/28/02	Jeffrey a. Utay
2002-011-98	11/28/02	11/28/02	Paul l'Neill
2002-011-99	11/28/02	11/28/02	Winston King
2002-011-100	11/28/02	11/28/02	Daniell Barnett
2002-011-101	11/28/02	11/28/02	Eric Brake
2002-011-102	11/28/02	11/28/02	Gregory Caruso
2002-011-103	11/28/02	11/28/02	Thomas Tubbs
2002-011-104	11/28/02	11/28/02	Erik Martin
2002-011-105	11/28/02	11/28/02	Jeffrey Bodenstein
2002-011-103	11/28/02	11/28/02	Andre Coy
2002-011-104	11/28/02	11/28/02	David Troesch

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-105	11/28/02	11/28/02	Aaron Swartz
2002-011-106	11/28/02	11/28/02	Jesse Bradley
2002-011-107	11/28/02	11/28/02	David Hamilton
2002-011-108	11/28/02	11/28/02	George DeDiovanni
2002-011-109	11/28/02	11/28/02	Thomas O'Grady
2002-011-110	11/28/02	11/28/02	Michael Passer
2002-011-111	11/28/02	11/28/02	Thomas Tubbs
2002-011-112	11/28/02	11/28/02	Erik Martin
2002-011-113	11/28/02	11/28/02	Jeffrey Bodenstein
2002-011-114	11/28/02	11/28/02	Patrick O' Donoghue
2002-011-115	11/28/02	11/28/02	Dylan Battard
2002-011-116	11/28/02	11/28/02	Keith Johnson
2002-011-117	11/28/02	11/28/02	Jeffrey Dubinsky
2002-011-118	11/28/02	11/28/02	Keith Mohill
2002-011-119	11/28/02	11/28/02	Jospeh Lane
2002-011-120	11/28/02	11/28/02	Eric Bass
2002-011-121	11/28/02	11/28/02	Roger Lemay
2002-011-122	11/28/02	11/28/02	Ken Hovater
2002-011-123	11/28/02	11/28/02	Brian Hasenstab
2002-011-124	11/28/02	11/28/02	Elizxabeth Spatz

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-125	11/28/02	11/28/02	Theron Schultz
2002-011-126	11/28/02	11/28/02	Donald Lett
2002-011-127	11/28/02	11/28/02	Charoes Thompson
2002-011-128	11/28/02	11/28/02	Ernest Keet
2002-011-129	11/28/02	11/28/02	Anthony Engel
2002-011-130	11/28/02	11/28/02	Matt Brown
2002-011-131	11/28/02	11/28/02	Kevin McAllister
2002-011-132	11/28/02	11/28/02	Matthew Gregory
2002-011-133	11/28/02	11/28/02	Gerald Dalton
2002-011-134	11/28/02	11/28/02	Kristen Loper
2002-011-135	11/28/02	11/28/02	Michael Jones
2002-011-136	11/28/02	11/28/02	David Solimano
2002-011-137	11/28/02	11/28/02	Paul Rodriguez
2002-011-138	11/28/02	11/28/02	Nick Tsourakis
2002-011-139	11/28/02	11/28/02	Tim Goral
2002-011-140	11/28/02	11/28/02	Michael Liepshutz
2002-011-141	11/28/02	11/28/02	Jeffrey Patterson
2002-011-142	11/28/02	11/28/02	Michael Narnard
2002-011-143	11/28/02	11/28/02	Mike Wells
2002-011-144	11/28/02	11/28/02	Donald Sanders

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-145	11/28/02	11/28/02	Sean Barrett
2002-011-146	11/28/02	11/28/02	Richard Maxson
2002-011-147	11/28/02	11/28/02	Charles Darby
2002-011-148	11/28/02	11/28/02	Robert Anderson
2002-011-149	11/28/02	11/28/02	Johathan Markowitz
2002-011-150	11/28/02	11/28/02	Sara Skinner
2002-011-151	11/28/02	11/28/02	Christopher Moore
2002-011-152	11/28/02	11/28/02	GarY Poland
2002-011-153	11/28/02	11/28/02	Angus Scott-Fleming
2002-011-154	11/28/02	11/28/02	Joseph Blaylock
2002-011-155	11/28/02	11/28/02	Graham Andrews
2002-011-156	11/28/02	11/28/02	Joel Braverman
2002-011-157	11/28/02	11/28/02	Peter de Jesus
2002-011-158	11/28/02	11/28/02	Andrew Lewman
2002-011-159	11/28/02	11/28/02	Damian Rickard
2002-011-160	11/28/02	11/28/02	Johnny Davis, Jr.
2002-011-161	11/28/02	11/28/02	Allen Campbell
2002-011-162	11/28/02	11/28/02	Karen Groffel
2002-011-163	11/28/02	11/28/02	Eric Anderson
2002-011-164	11/28/02	11/28/02	Mike Irwin
2002-011-165	11/28/02	11/28/02	John Clark

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-166	11/28/02	11/28/02	Joseph Pawlak
2002-011-167	11/28/02	11/28/02	Jonathan Silver
2002-011-168	11/28/02	11/28/02	Mark Durkin
2002-011-169	11/28/02	11/28/02	C H Groffel
2002-011-170	11/28/02	11/28/02	Robert Warner
2002-011-171	11/28/02	11/28/02	Toby Woller
2002-011-172	11/28/02	11/28/02	Thomas Poe
2002-011-173	11/28/02	11/28/02	James D. Bailey
2002-011-174	11/28/02	11/28/02	Galen Rubel
2002-011-175	11/28/02	11/28/02	Ross Vandergrift
2002-011-176	11/28/02	11/28/02	Erica Hulstrom
2002-011-177	11/28/02	11/28/02	Jonathan Peterson
2002-011-178	11/28/02	11/28/02	Gene Mance
2002-011-179	11/28/02	11/28/02	Duane Daniel
2002-011-180	11/28/02	11/28/02	Aaron Mayzes
2002-011-181	11/28/02	11/28/02	Jay Rapaport
2002-011-182	11/28/02	11/28/02	Charles Robinson
2002-011-183	11/28/02	11/28/02	Travis Brookins
2002-011-184	11/28/02	11/28/02	Patrick Lombardo
2002-011-185	11/28/02	11/28/02	David Ludwig
2002-011-186	11/28/02	11/28/02	Kapil Sachdev

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-187	11/28/02	11/28/02	Lance Heller
2002-011-188	11/28/02	11/28/02	David Hayes
2002-011-189	11/28/02	11/28/02	Beverlee Couillard
2002-011-190	11/28/02	11/28/02	Richard Smith
2002-011-191	11/28/02	11/28/02	Kevin Lampe
2002-011-192	11/28/02	11/28/02	Eric Blomstrom
2002-011-193	11/28/02	11/28/02	Jay Kloosterman
2002-011-194	11/28/02	11/28/02	Frank Simmons
2002-011-195	11/28/02	11/28/02	Michael Bolch
2002-011-196	11/28/02	11/28/02	Scott Sexton
2002-011-197	11/28/02	11/28/02	Krister Burhwel
2002-011-198	11/28/02	11/28/02	Thomas W. Smith
2002-011-199	11/28/02	11/28/02	Scott Emmett
2002-011-200	11/28/02	11/28/02	Geo Pearson
2002-011-201	11/28/02	11/28/02	Brian Fliege
2002-011-202	11/28/02	11/28/02	Daniel Thorman
2002-011-203	11/28/02	11/28/02	Harvey Fishman
2002-011-204	11/28/02	11/28/02	Jay McGavren
2002-011-205	11/28/02	11/28/02	Larisa Miller
2002-011-206	11/28/02	11/28/02	Matthew Andrew
2002-011-207	11/28/02	11/28/02	Chris Taylor

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-208	11/28/02	11/28/02	Edward Melendez
2002-011-209	11/28/02	11/28/02	Joseph Bury
2002-011-210	11/28/02	11/28/02	Timothy Talbert
2002-011-211	11/28/02	11/28/02	John Ziriaux
2002-011-212	11/28/02	11/28/02	Keith McFall
2002-011-213	11/28/02	11/28/02	Mark LaGattuta
2002-011-214	11/28/02	11/28/02	Meredith Tupper
2002-011-215	11/28/02	11/28/02	Michael Rolenz
2002-011-216	11/28/02	11/28/02	Marc Yaxley
2002-011-217	11/28/02	11/28/02	Franklin Bynum
2002-011-218	11/28/02	11/28/02	Aram Mirzadeh
2002-011-219	11/28/02	11/28/02	Eugene Fali
2002-011-220	11/28/02	11/28/02	Joe Battin
2002-011-221	11/28/02	11/28/02	Robert Amble, Jr.
2002-011-222	11/28/02	11/28/02	Daniel Webster
2002-011-223	11/28/02	11/28/02	Laurie Forti
2002-011-224	11/28/02	11/28/02	Anne Ewen
2002-011-225	11/28/02	11/28/02	Aaron Thompson
2002-011-226	11/28/02	11/28/02	Theo Tanalski
2002-011-227	11/28/02	11/28/02	Joshua Johnson
2002-011-228	11/28/02	11/28/02	Tracy Poff

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-229	11/28/02	11/28/02	Chester Lockett
2002-011-230	11/28/02	11/28/02	Michael Blake
2002-011-231	11/28/02	11/28/02	Aaron Hafer
2002-011-232	11/28/02	11/28/02	Tramond French
2002-011-233	11/28/02	11/28/02	Brent Miller
2002-011-234	11/28/02	11/28/02	David Lentini
2002-011-235	11/28/02	11/28/02	Logan Lindquist
2002-011-236	11/28/02	11/28/02	Tony Tovar
2002-011-237	11/28/02	11/28/02	Rob Hornick
2002-011-236	11/28/02	11/28/02	Peter Dubuque
2002-011-239	11/28/02	11/28/02	Nicholas Schoeb
2002-011-240	11/28/02	11/28/02	Michael Gulinski
2002-011-241	11/28/02	11/28/02	William Graham
2002-011-242	11/28/02	11/28/02	Jenny Banker
2002-011-243	11/28/02	11/28/02	Richard Hume
2002-011-244	11/28/02	11/28/02	Edward D'Ovidio
2002-011-245	11/28/02	11/28/02	Robert Raisch
2002-011-246	11/28/02	11/28/02	Robert Haener IV
2002-011-247	11/28/02	11/28/02	Benjamin Benigno
2002-011-248	11/28/02	11/28/02	Christian Wehba
2002-011-249	11/28/02	11/28/02	Gary Doll

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-250	11/28/02	11/28/02	Marc Moore
2002-011-251	11/28/02	11/18/02	Kent State University
2002-011-252	11/28/02	11/28/02	Library of Michigan
2002-011-253	11/28/02	11/28/02	Carol Wahrer
2002-011-254	11/28/02	11/28/02	Derk Gates
2002-011-255	11/28/02	11/28/02	Rick Potthoff
2002-011-256	11/28/02	11/28/02	Abtin Shakouri
2002-011-257	11/28/02	11/28/02	Jeffry Friedt
2002-011-258	11/28/02	11/28/02	David Diamond
2002-011-259	11/28/02	11/28/02	Curtis Sahakian
2002-011-260	11/28/02	11/28/02	Ryan Maxwell
2002-011-261	11/28/02	11/18/02	Klaus Schreyack
2002-011-262	11/28/02	11/28/02	Alessandro Abate
2002-011-263	11/28/02	11/28/02	Jeremiah Cornelius
2002-011-264	11/28/02	11/28/02	Anthony Cavanaugh
2002-011-265	11/28/02	11/28/02	BC Petery
2002-011-266	11/28/02	11/28/02	Brent Garber
2002-011-267	11/28/02	11/28/02	Shel Cerensie
2002-011-268	11/28/02	11/28/02	Jason Duell
2002-011-269	11/28/02	11/28/02	D.J. Capelis
2002-011-270	11/28/02	11/28/02	Gabriella Turek

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-271	11/28/02	11/28/02	Charles Webb
2002-011-272	11/28/02	11/02/02	Tim Kubista
2002-011-273	11/28/02	11/18/02	Greg Trouw
2002-011-274	11/28/02	11/28/02	Lyen Huang
2002-011-275	11/28/02	11/18/02	Michael Edwards
2002-011-276	11/28/02	11/18/02	Ali Saidi
2002-011-277	11/28/02	11/28/02	John Elder
2002-011-278	11/28/02	11/28/02	Jason Solderbeck
2002-011-279	11/28/02	11/28/02	Albert Basseetti
2002-011-280	11/28/02	11/28/02	Kenna Feeney
2002-011-281	11/28/02	11/28/02	James Reaume
2002-011-282	11/28/02	11/18/02	David Magnuson
2002-011-283	11/28/02	11/28/02	John Nichols
2002-011-284	11/28/02	11/18/02	Robert Gregg
2002-011-285	11/28/02	11/28/02	Jonathan Blaine
2002-011-286	11/28/02	11/18/02	Robert Cox
2002-011-287	11/28/02	11/28/02	James Caruso
2002-011-288	11/28/02	11/18/02	Thomas Russell
2002-011-289	11/28/02	11/28/02	David Taylor
2002-011-290	11/28/02	11/18/02	Carrie Smith

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-291	11/28/02	11/28/02	Jim Wang
2002-011-292	11/28/02	11/28/02	Clark Tenney
2002-011-293	11/28/02	11/28/02	Dale Hill
2002-011-294	11/28/02	11/28/02	Mark Woon
2002-011-295	11/28/02	11/28/02	Jared Ford
2002-011-296	11/28/02	11/28/02	Jacqueline Fralley
2002-011-297	11/28/02	11/28/02	Suzzanne Glass
2002-011-298	11/28/02	11/28/02	Nick Lavelly
2002-011-299	11/28/02	11/18/02	Patrick Hoban
2002-011-300	11/28/02	11/28/02	Benjamin Anderson
2002-011-301	11/28/02	11/18/02	Terrance Comella
2002-011-302	11/28/02	11/28/02	Curtis Hawthorne
2002-011-303	11/28/02	11/18/02	Caleb Ciampaglia
2002-011-304	11/28/02	11/28/02	Joe Rowlands
2002-011-305	11/28/02	11/28/02	Larry Mayer
2002-011-306	11/28/02	11/18/02	David Rogers
2002-011-307	11/28/02	11/28/02	Cliff Williamson
2002-011-308	11/28/02	11/18/02	Matthias Johnson
2002-011-309	11/28/02	11/28/02	Paul Impola
2002-011-310	11/28/02	11/28/02	Ross Alexander
2002-011-311	11/28/02	11/28/02	Allison Becker

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-312	11/28/02	11/28/02	Anthony O'Neill
2002-011-313	11/28/02	11/28/02	Charles Wiese
2002-011-314	11/28/02	11/28/02	S. Steriti
2002-011-315	11/28/02	11/18/02	Jeff Burton
2002-011-316	11/28/02	11/28/02	James Macy
2002-011-317	11/28/02	11/28/02	Brent Johnson
2002-011-318	11/28/02	11/28/02	Debra Pruett
2002-011-319	11/28/02	11/28/02	Michael Keller
2002-011-320	11/28/02	11/28/02	Kyle Stratis
2002-011-321	11/28/02	11/28/02	John T. Powers , Jr.
2002-011-322	11/28/02	11/28/02	Grady Joslin
2002-011-323	11/28/02	11/28/02	Steve Kirkbride
2002-011-324	11/28/02	11/28/02	Jimmy Teegarden
2002-011-325	11/28/02	11/28/02	Kyle Marshall
2002-011-326	11/28/02	11/28/02	Christopher Kohan
2002-011-327	11/28/02	11/28/02	Francis Bunker Parker
2002-011-328	11/28/02	11/28/02	Keith Wissing
2002-011-329	11/28/02	11/18/02	Nathan Wardrip- Fruin
2002-011-330	11/28/02	11/28/02	Garth Payne

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-331	11/28/02	11/28/02	Thomas Ditmars
2002-011-332	11/28/02	11/28/02	Jim Clark Clark
2002-011-333	11/28/02	11/28/02	Portia Mottola
2002-011-334	11/28/02	11/28/02	James Dolliver
2002-011-335	11/28/02	11/28/02	Robert Stephenson
2002-011-336	11/28/02	11/28/02	Menachem Green
2002-011-337	11/28/02	11/28/02	Joseph Hill
2002-011-338	11/28/02	11/28/02	Gerald Stafford
2002-011-339	11/28/02	11/28/02	Henry Ketter
2002-011-340	11/28/02	11/28/02	Carlos Averett
2002-011-341	11/28/02	11/2918/02	Derek Cheney
2002-011-342	11/28/02	11/28/02	David Freyberger
2002-011-343	11/28/02	11/28/02	Jorge Escala
2002-011-344	11/28/02	11/28/02	William Bailey
2002-011-345	11/28/02	11/28/02	Kyle Ritchie
2002-011-346	11/28/02	11/28/02	Roger Hackett
2002-011-347	11/28/02	11/28/02	Scott Walters
2002-011-348	11/28/02	11/28/02	Jason Reich
2002-011-349	11/28/02	11/28/02	Andrew Casper

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-350	11/28/02	11/28/02	Andrew G. Katsnaevas
2002-011-351	11/28/02	11/28/02	Edward Robins
2002-011-352	11/28/02	11/29/02	David Huseth
2002-011-353	11/29/02	11/28/02	Gary Ray
2002-011-354	11/29/02	11/29/02	Gary Ward
2002-011-355	11/29/02	11/29/02	Max Hunger
2002-011-356	11/29/02	11/29/02	Devin Tolcou
2002-011-357	11/29/02	11/29/02	John Christgau
2002-011-358	11/29/02	11/29/02	Mike Simmons
2002-011-359	11/29/02	11/29/02	David Stephenson
2002-011-360	11/29/02	11/29/02	William Lewis
2002-011-361	11/29/02	11/29/02	Eugene Vasserman
2002-011-362	11/29/02	11/29/02	Geoffrey Peck
2002-011-363	11/29/02	11/29/02	Kevin Mess
2002-011-364	11/29/02	11/29/02	David Bennoch
2002-011-365	11/29/02	11/29/02	Michael Cox
2002-011-366	11/29/02	11/29/02	Debbie Zwaan
2002-011-367	11/29/02	11/29/02	Joseph Wise
2002-011-368	11/29/02	11/29/02	Al Zoda
2002-011-369	11/29/02	11/29/02	David W. Hines

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-370	11/29/02	11/29/02	Greg Whorley
2002-011-371	11/29/02	11/29/02	Joshua Smelster
2002-011-372	11/29/02	11/29/02	Michael Murphy
2002-011-373	11/29/02	11/29/02	Jeffrey White
2002-011-374	11/29/02	11/29/02	Steven Kohler
2002-011-375	11/29/02	11/29/02	Mike Long
2002-011-376	11/29/02	11/29/02	Paul David
2002-011-377	11/29/02	11/29/02	Michael Spadea
2002-011-378	11/29/02	11/29/02	Jusrin Alfaro
2002-011-379	11/29/02	11/29/02	Hesky Fisher
2002-011-380	11/29/02	11/29/02	Baba Kofi Weusijana
2002-011-381	11/29/02	11/29/02	Stephen Drozdick
2002-011-382	11/29/02	11/29/02	Douglas Buchanan
2002-011-383	11/29/02	11/29/02	Jared Kaufman
2002-011-384	11/29/02	11/29/02	Peter Suber
2002-011-385	11/29/02	11/29/02	Burwood McFarland
2002-011-386	11/29/02	11/29/02	Mark Weindling
2002-011-387	11/29/02	11/29/02	Lyle Tagawa
2002-011-388	11/29/02	11/29/02	Paul Warwick
2002-011-389	11/29/02	11/29/02	Joseph St. Pierre
2002-011-390	11/29/02	11/29/02	Daniel Schell

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-391	11/29/02	11/29/02	Victor Allen
2002-011-392	11/29/02	11/29/02	John Sitnik
2002-011-393	11/29/02	11/29/02	Keith Hannah
2002-011-394	11/29/02	11/29/02	Ellen Podolsky
2002-011-395	11/29/02	11/29/02	Randen Pederson
2002-011-396	11/29/02	11/29/02	Jared Dufour
2002-011-397	11/29/02	11/29/02	David Platt
2002-011-398	11/29/02	11/29/02	Chris Christianson
2002-011-399	11/29/02	11/29/02	Walter Szewelanczyk
2002-011-400	11/29/02	11/29/02	Andrew Frankel
2002-011-401	11/29/02	11/29/02	Joseph Pate
2002-011-402	11/29/02	11/29/02	Jonathan Sailor
2002-011-403	11/29/02	11/29/02	John Oakley
2002-011-404	11/29/02	11/29/02	Kevin Jarnot
2002-011-405	11/29/02	11/29/02	Joseph Calistro
2002-011-406	11/29/02	11/29/02	Michael Attili
2002-011-407	11/29/02	11/29/02	Amy Kearns
2002-011-408	11/29/02	11/29/02	Joe Medina
2002-011-409	11/29/02	11/29/02	Valdemar Johnson
2002-011-410	11/29/02	11/29/02	Jesse Emry

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-411	11/29/02	11/29/02	Nelson Abramson
2002-011-412	11/29/02	11/29/02	Casey Muratori
2002-011-413	11/29/02	11/29/02	George Maslyar
2002-011-414	11/29/02	11/29/02	Benjamin Johnson
2002-011-415	11/29/02	11/29/02	Elizabeth Moreno
2002-011-416	11/29/02	11/29/02	Lancia Speed
2002-011-417	11/29/02	11/29/02	William Campbell
2002-011-418	11/29/02	11/29/02	Mark A. Adams, Jr.
2002-011-419	11/29/02	11/29/02	Dave Lundgren
2002-011-420	11/29/02	11/29/02	John Vaughn
2002-011-421	11/29/02	11/29/02	John Klopp
2002-011-422	11/29/02	11/29/02	D. Simon
2002-011-423	11/29/02	11/29/02	Steven Usdansky
2002-011-424	11/29/02	11/29/02	Peter Weyman
2002-011-426	11/29/02	11/29/02	K. Skelding
2002-011-426	11/29/02	11/29/02	K. Danowski
2002-011-427	11/29/02	11/29/02	Ben Munat
2002-011-428	11/29/02	11/29/02	Brent Hayton
2002-011-429	11/29/02	11/29/02	Christopher Kelly
2002-011-430	11/29/02	11/29/02	Borne Goodman-Mace
2002-022-431	11/29/02	11/29/02	Timur Tabi

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-432	11/29/02	11/29/02	Bryan Dunnington
2002-011-433	11/29/02	11/29/02	Robert Van Cleef
2002-011-434	11/29/02	11/29/02	Allen McDow
2002-011-435	11/29/02	11/29/02	Eric Wollesen
2002-011-436	11/29/02	11/29/02	Barry Weikle
2002-011-437	11/29/02	11/29/02	Albin Jones
2002-011-438	11/29/02	11/29/02	Brendan Howes
2002-011-439	11/29/02	11/29/02	James Sims
2002-011-440	11/29/02	11/29/02	George Nimmer
2002-011-441	11/29/02	11/29/02	John Boyd
2002-011-442	11/29/02	11/29/02	William Blair
2002-011-443	11/29/02	11/29/02	Steve Dale
2002-011-444	11/29/02	11/29/02	Tom Perez
2002-011-445	11/29/02	11/29/02	Shawn Kinzel
2002-011-446	11/29/02	11/29/02	HJ Brandon
2002-011-447	11/29/02	11/29/02	Nate Monroe
2002-011-448	11/29/02	11/29/02	Clifton Hyatt
2002-011-449	11/29/02	11/29/02	Carrie Barclay
2002-011-450	11/29/02	11/29/02	Matthew Mcatyre
2002-011-451	11/29/02	11/29/02	Kenneth Kleinfelter
2002-011-452	11/29/02	11/29/02	Jeffrey Mangers

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-453	11/29/02	11/29/02	David Streip
2002-011-454	11/29/02	11/29/02	Claudius Stute
2002-011-455	11/29/02	11/29/02	Allan Snider
2002-011-456	11/29/02	11/29/02	Beth Senturia
2002-011-457	11/29/02	11/29/02	Kerry Carskadon
2002-011-458	11/29/02	11/29/02	Theresa Irwin
2002-011-459	11/29/02	11/29/02	Michael Woodson
2002-011-460	11/29/02	11/29/02	Jeff Annis
2002-011-461	11/29/02	11/29/02	John Amaral
2002-011-462	11/29/02	11/29/02	Jeff Hinrichs
2002-011-463	11/29/02	11/29/02	Greg Filak
2002-011-464	11/29/02	11/29/02	Elizabeth Asquini
2002-011-465	11/29/02	11/29/02	Thomas DeRoy
2002-011-466	11/29/02	11/29/02	Aravind Mikkilineni
2002-011-467	11/29/02	11/29/02	Mark DeHaven
2002-011-468	11/30/02	11/29/02	Edward Childress
2002-011-469	11/30/02	11/29/02	Alfred Blitzer
2002-011-470	11/30/02	11/29/02	Paul Staszko
2002-011-471	11/30/02	11/29/02	David Menke
2002-011-472	11/30/02	11/29/02	Keith Barber
2002-011-473	11/30/02	11/30/02	Daryl Straszheim

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-474	11/30/02	11/29/02	Jared Lueck
2002-011-475	11/30/02	11/29/02	Ryan Carrico
2002-011-476	11/30/02	11/30/02	Niels Schaumann
2002-011-477	11/30/02	11/30/02	Shane Hartman
2002-011-478	11/30/02	11/30/02	Reid Bell
2002-011-479	11/30/02	11/30/02	Timothy Slocum
2002-011-480	11/30/02	11/30/02	Raymond Edwards
2002-011-481	11/30/02	11/30/02	David Ballenger
2002-011-482	11/30/02	11/30/02	Dan Erbele
2002-011-483	11/30/02	11/30/02	George Fischer
2002-011-484	11/30/03	11/30/02	Alan Field
2002-011-485	11/30/02	11/30/02	Michael O'Sullivan
2002-011-486	11/30/02	11/30/02	Don Hoover
2002-011-487	11/30/02	11/30/02	Lyn Cox
2002-011-488	11/30/02	11/30/02	Erich Friesen
2002-011-489	11/30/02	11/30/02	C.M. Finuf, Jr.
2002-011-490	11/30/02	11/30/02	Paula Van De Werken
2002-011-491	11/30/02	11/30/02	Elizabeth Campbell
2002-011-492	11/30/02	11/30/02	Marc Perkel
2002-011-493	11/30/02	11/30/02	Jonathan Auer
2002-011-494	11/30/02	11/30/02	Dennis Dively

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-495	11/30/02	11/30/02	Aloysius Wild
2002-011-496	11/30/02	11/30/02	Mark Molstad
2002-011-497	11/30/02	11/30/02	Theodore Summers
2002-011-498	11/30/02	11/30/02	Elizabeth Edwards
2002-011-499	11/30/02	11/30/02	Code Rank
2002-011-500	11/30/02	11/30/02	John Milton Hendricks
2002-011-501	11/30/02	11/30/02	Robert Kane
2002-011-502	12/02/02	12/02/02	Marx Rivera
2002-011-503	12/02/02	12/02/02	Paul A. Arrigo
2002-011-504	11/30/02	11/30/02	Kevin Middleton
2002-011-505	11/30/02	11/30/02	James Cardwell
2002-011-506	11/30/02	11/30/02	R. Randall Rathbun
2002-011-507	11/30/02	11/30/02	Marvin Sirbu
2002-011-508	11/30/02	11/30/02	Lan Campbell
2002-011-509	11/30/02	11/30/02	David Truog
2002-011-510	11/30/02	11/30/02	Eric Brown
2002-011-511	11/30/02	11/30/02	Clyde Peel
2002-011-512	11/30/02	11/30/02	Eliot Freidson
2002-011-513	11/30/02	11/30/02	John Jowers
2002-011-514	11/30/02	11/30/02	Jennifer Leone
2002-011-515	11/30/02	11/30/02	Daniel Martinez

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-516	11/30/02	11/30/02	Jane Marks
2002-011-517	11/30/02	11/30/02	Kendra Kuykendall
2002-011/518	11/30/02	11/30/02	Robert Desmond
2002-011-519	11/30/02	11/30/02	Kathleen McCook
2002-011-520	11/30/02	11/30/02	Paul Spoerry
2002-011-521	11/30/02	11/30/02	Thomas Gideon
2002-011-522	11/30/02	11/30/02	Paul Dupuy
2002-011-523	11/30/02	11/30/02	Roger Keyes
2002-011-524	11/30/02	11/30/02	Saul Grand
2002-011-525	11/30/02	11/30/02	Amanda Schehr
2002-011-526	11/30/02	11/30/02	Michael Manners
2002-011-527	11/30/02	11/30/02	Graham Andrews
2002-0110528	11/30/02	11/30/02	Morgan Herman
2002-011-529	11/30/02	11/30/02	Bill Rickords
2002-011-530	11/30/02	11/30/02	Zachary VerGow
2002-011-531	11/30/02	11/30/02	David Vanthournout
2002-011-532	11/30/02	11/30/02	Harold Burstyn
2002-011-533	11/30/02	11/30/02	Greg Williams
2002-011-534	11/30/02	11/30/02	Mary Cassell
2002-011-535	11/30/02	11/30/02	Elisa Carlson
2002-011-536	11/30/02	11/30/02	Daniel Orr

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-537	11/30/02	11/30/02	Victor DeAngelo
2002-011-538	12/01/02	11/30/02	Jeremiah Blatz
2002-011-539	12/01/02	11/30/02	George Tipsword
2002-011-540	12/01/02	11/30/02	Eileen Shannahan
2002-011-541	12/01/02	11/20/02	Michael Barnes
22002-011-542	12/01/02	11/30/02	Dennis Ingram
2002-011-543	12/01/02	11/30/02	Jesse Card
2002-011-544	12/01/02	11/30/02	Jonathan Schiff
2002-011-545	12/01/02	11/30/02	Noah Glass
2002-011-546	12/01/02	11/30/02	Nell Sandow
2002-011-547	12/01/02	11/30/02	E G
2002-011-548	12/01/02	11/30/02	John Kramer
2002-011-549	12/01/02	12/01/02	Desiree Coulter
2002-011-550	12/01/02	12/01/02	Felipe Alberato
2002-011-551	12/01/02	12/01/02	Mark Lutz
2002-011-552	12/01/02	12/01/02	Richard Edwards
2002-011-553	12/01/02	12/011/02	Gary Moraco
2002-011-554	12/01/02	12/01/02	Erika hatcher
2002-011-555	12/01/02	12/01/02	Daniel Duff
2002-011-556	12/01/02	12/01/02	Raymond Dunn
2002-011-557	12/01/02	12/01/02	George Willis

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-558	12/01/02	12/01/02	Christopher Wenneman
2002-011-559	12/01/02	12/01/02	Jeffrey Gschwend
2002-011-560	12/01/02	12/01/02	Jean Andrews
2002-011-561	12/01/02	12/01/02	John Redmon
2002-011-562	12/01/02	12/01/02	Bill Mitchom
2002-011-563	12/011/02	12/01/02	Beth macknik
2002-011-564	12/01/02	12/01/02	Robert Couchman
2002-011-565	12/01/02	12/01/02	Andrew Williams
2002-011-566	12/01/02	12/01/02	Mark Schwebke
2002-011-567	12/01/02	12/01/02	Lesley Pease
2002-011-568	12/01/02	12/01/02	Marl McCarthy
2002-011-569	12/01/02	12/01/02	Jacqueline Lasahn
2002-011-570	12/01/02	12/01/02	Dan barkley
2002-011-571	12/01/02	12/011/02	William Wertenbaker
2002-011-572	12/01/02	12/01/02	John Oakley
2002-011-573	12/01/02	12/01/02	Gregory Catalone
2002-011-754	12/01/02	12/01/02	Mariam Wynn
2002-011-575	12/01/02	12/01/02	Michael Cole
2002-011-576	12/011/02	12/01/02	Tim Bloom
2002-011-577	12/01/02	12/01/02	Albert Sweigart

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-578	12/01/02	12/01/02	C. Scott Ananian
2002-011-579	12/01/02	12/011/02	Robert owens
2002-011-580	12/01/02	12/01/02	Christopher Pedersen
2002-011-581	12/01/02	12/01/02	Jonathan Sailor
2002-011-582	12/011/02	12/01/02	Ron Giesman
2002-011-583	12/01/02	12/01/02	Kevin Rolfes
2002-011-584	12/011/02	12/01/02	Joe Venzon
2002-011-585	12/01/02	12/01/02	Linda Sullivan
2002-011-586	12/01/02	12/01/02	Eric Dynamic
2002-011-587	12/01/02	12/011/02	Jason Ellison
2002-011-588	12/01/02	12/01/02	Brian Raker
2002-011-589	12/01/02	12/01/02	Patrick O'Hara
2002-011-590	12/011/02	12/01/02	William McKee
2002-011-591	12/01/02	12/01/02	Allen Small
2002-011-592	12/01/02	12/011/02	Nelson Pavlosky
2002-011-593	12/01/02	12/01/02	Ethan Frantz
2002-011-594	12/01/02	12/01/02	Kathleen Jones
2002-011-595	12/01/02	12/01/02	Brian Bradley
2002-011-596	12/01/02	12/01/02	Charles Plater
2002-011-597	12/01/02	12/01/02	Thomas Reynolds
2002-011-598	12/01/02	12/01/02	Shawn Auberzinski

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-599	12/01/02	12/01/02	CJ Hillman
2002-011-600	12/02/02	12/01/02	Carl Campbell
2002-011-601	12/01/02	12/01/02	Roderic Collins
2002-011-602	12/01/02	12/01/02	Jason Greene
2002-011-603	12/01/02	12/01/02	Robert Jagger
2002-011-604	12/01/02	12/01/02	Joshua McConaha
2002-011-605	12/01/02	12/01/02	Carter St. Clair
2002-011-606	12/01/02	12/01/02	Christopher Frankonis
2002-011-607	12/01/02	12/01/02	Lynette Bellini
2002-011-608	12/01/02	12/01/02	Ryan Joy
2002-011-609	12/02/02	12/01/02	Javier Jones
2002-011-610	12/02/02	12/01/02	Sarah Maximiek
2002-011-611	12/02/02	12/01/02	B.J. Herbison
2002-011-612	12/02/02	12/01/02	Joan Taub
2002-011-613	12/02/02	12/01/02	Judith robinson
2002-011-614	12/02/02	12/01/02	Nora Dimmock
2002-011-615	12/02/02	12/01/02	Sandra Groleau
2002-011-616	12/02/02	12/01/02	Joseph Ritter
2002-011-617	12/02/02	12/01/02	Cynthia Mckane
2002-011-618	12/02/02	12/01/02	Luke Griffin
2002-011-619	12/02/02	12/01/02	Bradford Malone

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2002-011-620	12/02/02	12/01/02	Everien Malone
2002-011-621	12/02/02	12/01/02	Karen Chopra
2002-011-622	12/02/02	12/01/02	Jeff Cogshall
2002-011-623	12/02/02	12/01/02	Tido Ciaravino
2002-011-624	12/02/02	12/01/02	Mark Ayers
2002-011-625	12/02/02	12/01/02	J. Paul Davidson
2002-011-626	12/02/02	12/01/02	Randall Reiss
2002-011-627	12/02/02	12/01/02	Mary Ann E. Archer
2002-011-628	12/02/02	12/02/02	Margalit Post
2002-011-629	12/02/02	12/02/02	Yaron Goland
2002-011-630	12/02/02	12/02/02	Fernando Frausto
2002-011-631	12/02/02	12/02/02	Christoph Weber
2002-011-632	12/02/02	12/02/02	Cindy Rosser
2002-011-633	12/02/02	12/02/02	Karen Heil
2002-011-634	12/02/02	12/02/02	Judy Helms
2002-011-635	12/02/02	12/02/02	Gloria Black
2002-011-636	12/02/02	12/02/02	Francis X. Norton
2002-011-637	12/02/02	12/02/02	Elizabeth Rogers
2002-011-638	12/02/02	12/02/02	Seanan Murphy
2002-011-639	12/02/02	12/02/02	Daniel rodriguez
2002-011-640	12/02/02	12/02/02	Bruce Birch

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-641	12/02/02	12/02/02	Kimberly Stone
2002-011-642	12/02/02	12/02/02	James Jacobs
2002-011-643	12/02/02	12/02/02	Patrick Ryan
2002-011-644	12/02/02	12/02/02	Margie Hawkins
2002-011-645	12/02/02	12/02/02	Dick Breen
2002-011-646	12/02/02	12/02/02	Jane Platt-Brown
2002-011-647	12/02/02	12/02/02	Jeffrey mandel
2002-011-648	12/02/02	12/02/02	Brad Myers
2002-011-649	12/02/02	12/02/02	Ruth Gervais
2002-011-650	12/02/02	12/02/02	Richard J. Powell
2002-011-651	12/02/02	12/02/02	Loretta Mershon
2002-011-652	12/02/02	12/02/02	Craig {psmantur
2002-011-653	12/02/02	12/02/02	Tom Nolan
2002-011-654	12/02/02	12/02/02	Michael Gustine
2002-011-655	12/02/02	12/02/02	Erik Burton
2002-011-656	12/02/02	12/02/02	Ann Dedek
2002-011-657	12/02/02	12/02/02	Monica Smith
2002-011-658	12/02/02	12/02/02	Diane Downing
2002-011-659	12/02/02	12/02/02	Nathan Bussey
2002-011-660	12/02/02	12/02/02	Darrin Hyrup
2002-011-661	12/02/02	12/02/02	Erik Hanson

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-662	12/02/02	12/02/02	Paul Hutchinson
2002-011-663	12/02/02	12/02/02	Arlo Clauser
2002-011-664	12/02/02	12/02/02	Jodie & Ned Delamatre
2002-011-665	12/02/02	12/02/02	Georgia Baugh
2002-011-666	12/02/02	12/02/02	Allison Henry
2002-011-667	12/02/02	12/02/02	Jeffrey Melton
2002-011-668	12/02/02	12/02/02	Eric Smith
2002-011-669	12/02/02	12/02/02	Frank Wiles
2002-011-670	12/02/02	12/02/02	Whitney Davis
2002-011-671	12/02/02	12/02/02	David Smeeton
2002-011-672	12/02/02	12/02/02	Tonia Burton
2002-011-673	12/02/02	12/02/02	Jeremy Mays
2002-011-674	12/02/02	12/02/02	Mia Giglio
2002-011-675	12/02/02	12/02/02	Karl Palutke
2002-011-676	12/02/02	12/02/02	Carol tobin
2002-011-677	12/02/02	12/02/02	Deena Lipomi
2002-011-678	12/02/02	12/02/02	Mark Bbay
2002-011-679	12/02/02	12/02/02	Diane Kinney
2002-011-680	12/02/02	12/02/02	Pat Magierski
2002-011-681	12/02/02	12/02/02	Randall fidler

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-682	12/02/02	12/02/02	Collin Lynch
2002-011-683	12/02/02	12/02/02	Michael Esler
2002-011-684	12/02/02	12/02/02	John Montre
2002-011-685	12/02/02	12/02/02	Michelle Arnold
2002-011-686	12/02/02	12/02/02	William Boarman
2002-011-687	12/02/02	12/02/02	Judie Smith
2002-011-688	12/02/02	12/02/02	Patricia Conley
2002-011-689	12/02/02	12/02/02	Erin Kinney
2002-011-690	12/02/02	12/02/02	William Fitzpatrick
2002-011-691	12/02/02	12/02/02	Jeffrey Bragg
2002-011-692	12/02/02	12/02/02	Shari Salisbury
2002-011-693	12/02/02	12/02/02	Morgan Jones
2002-011-694	12/02/02	12/02/02	Ryan Wuerth
2002-011-695	12/02/02	12/02/02	Sandra Downing
2002-011-696	12/02/02	12/02/02	Chris Dan Bento
2002-011-697	12/02/02	12/02/02	Matthew Gallagher
2002-011-698	12/02/02	12/02/02	Sharon Warne
2002-011-699	12/02/02	12/02/02	Kim Rasmussen
2002-011-700	12/02/02	12/02/02	Ken Davenport

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-701	12/01/01	12/01/02	John Coggeshall
2002-011-702	12/01/02	12/01/02	Kevin Hawkins
2002-011-703	12/02/02	11/22/02	Office of the Federal Environment Executive
2002-011-704	12/02/02	12/02/02	Yvonne Maute
2002-011-705	12/02/02	12/02/02	Rochelle Cheifetz
2002-011-706	12/02/02	12/02/02	David Bigwood
2002-011-707	12/02/02	12/02/02	Brian Marick
2002-011-708	12/02/02	12/02/02	Michael LeRoy
2002-011-709	12/02/02	12/02/02	Tracy Paradis
2002-011-710	12/02/02	12/02/02	Edward Herman
2002-011-711	12/02/02	12/02/02	Stephen Barbour
2002-011-712	12/02/02	12/02/02	Andrzej Imiolek
2002-011-713	12/02/02	12/02/02	Nicholas Taranko
2002-011-714	12/02/02	12/02/02	Laurence Baden
2002-011-715	12/02/02	12/02/02	Sara E. Kelley
2002-011-716	12/02/02	12/02/02	Seth Grossman
2002-011-717	12/02/02	12/02/02	Brian Hoort
2002-011-718	12/02/02	12/02/02	Jeanne Lauber
2002-011-719	12/02/02	12/02/02	Alex Tsalolokhin
2002-011-720	12/02/02	12/02/02	Marcia Daumen

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-721	12/02/02	12/02/02	L. Moyer
2002-011-722	12/02/02	12/02/02	Daisy Waters
2002-011-723	12/02/02	12/02/02	Catherine Collins
2002-011-724	12/02/02	12/02/02	Francis Kaylwa
2002-011-725	12/02/02	12/02/02	Brooke Heaton
2002-011-726	12/02/02	12/02/02	Stacy Brown
2002-011-727	12/03/02	12/04/02	Jane Allen
2002-011-728	12/03/02	12/03/02	Richard Coleman
2002-011-729	12/03/02	12/03/02	Laura Raccagni
2002-011-730	12/03/02	12/03/02	Jeffrey Bruce
2002-011-731	12/03/02	12/03/02	Benjamin Snyder
2002-011-732	12/03/02	12/03/02	Jay Greenfield
2002-011-733	12/03/02	12/03/02	Randy Gilleland
2002-011-734	12/03/02	12/03/02	Earl G. Bley, Jr.
2002-011-735	12/03/02	12/03/02	Steve Wendt
2002-011-736	12/03/02	12/03/02	Kirk Sefchik
2002-011-737	12/03/02	12/03/02	andrea Burke
2002-011-738	12/03/02	12/03/02	David Lepore
2002-011-739	12/03/02	12/03/02	Stephen Dulaney
2002-011-740	12/03/02	12/03/02	Rusty Tab, Jr.
2002-011-741	12/03/02	12/03/02	Sue Aschim

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-742	12/03/02	12/03/02	David Rice
2002-011-743	12/03/02	12/03/02	Justin Gosling
2002-011-744	12/03/02	12/03/02	Darren Kosinski
2002-011-745	12/03/02	12/03/02	Remy Fiorentino
2002-011-746	12/03/02	12/02/02	Brian Mueller
2002-011-747	12/03/02	12/02/02	Noah Gauthier
2002-011-748	12/02/02	12/02/02	Christian Prine
2002-011-749	12/02/02	12/02/02	Craig Myers
2002-011-750	12/02/02	12/02/02	Khatun Hollenberg
2002-011-751	12/02/02	12/02/02	Blake Hutchinson
2002-011-752	12/02/02	12/02/02	Tom Stave
2002-011-753	12/02/02	12/02/02	Bryant Johnson
2002-011-754	12/02/02	12/02/02	Richard Rodrigues
2002-011-755	12/02/02	12/02/02	Buch Sherman
2002-011-756	12/02/02	12/02/02	Jonathan Bonebrake
2002-011-757	12/02/02	12/02/02	John Martinez
2002-022-758	12/02/02	12/02/02	Deane Roppe
2002-011-759	12/02/02	12/02/02	Brian Putnam
2002-011-760	12/02/02	12/02/02	Ernarosa Tominich
2002-011-761	12/02/02	12/02/02	Nydia Gutowski

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-762	12/02/02	12/02/02	Dan Hoal
2002-011-763	12/02/02	12/02/02	Bruno Melninkaitis
2002-011-764	12/02/02	12/02/02	Kelly Mullaney
2002-011-765	12/02/02	12/02/02	Andrew David
2002-011-766	12/02/02	12/02/02	Mark Chase
2002-011-767	12/02/02	12/02/02	John Ellery
2002-011-768	12/02/02	12/02/02	Daryll Strauss
2002-011-769	12/02/02	12/02/02	Michael Boyle
2002-011-770	12/02/02	12/02/02	Frank Landrum
2002-011-771	12/02/02	12/02/02	Susan Maclean
2002-011-772	12/02/02	12/02/02	Troy Gladhill
2002-011-773	12/02/02	12/02/02	Lawrence Wiseman
2002-011-774	12/02/02	12/02/02	Jaime Schulte
2002-011-775	12/02/02	12/02/02	Robert Sorensen
2002-011-776	12/02/02	12/02/02	Joe Carmihcael
2002-011-777	12/02/02	12/02/02	Maryalice Kilbourne
2002-011-778	12/02/02	12/02/02	Susan Lewis Somers
2002-011-779	12/02/02	12/02/02	Carl Marshall
2002-011-780	12/02/02	12/02/02	Charles Schmidt
2002-011-781	12/02/02	12/02/02	Anne Grady

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-782	12/02/02	12/02/02	Wendy Mann
2002-011-783	12/02/02	2/02/02	Apgood Rick
2002-011-784	12/02/02	2/02/02	Gail Fithian
2002-011-785	12/02/02	12/02/02	David Hollender
2002-011-786	12/02/02	12/02/02	Kristi Dickey
2002-011-787	12/02/02	12/02/02	Robert Curtis
2002-011-788	12/02/02	12/02/02	Marx Rivera
2002-011-789	12//02/02	12/02/02	David Rhoten
2002-011-790	12/02/02	12/02/02	Alex Pasternak
2002-011-791	12/02/02	12/02/02	Howard Davidson
2002-011-792	12/02/02	12/02/02	John Homer
2002-011-793	12/02/02	12/02/02	Cushing Whitney
2002-011-794	12/02/02	12/02/02	Joan Thomas
2002-011-795	12/02/02	12/02/02	Craig Wheeler
2002-011-796	12/02/02	12/02/02	Richard West
2002-011-797	12/02/02	12/02/02	Karel Baloun
2002-011-798	12/02/02	12/02/02	Gordon Fischer
2002-011-799	12/02/02	12/02/02	William Bennett
2002-011-800	12/02/02	12/02/02	Jeffrey VanGundy
2002-011-801	12/02/02	12/02/02	Kevin Tuohey
2002-011-802	12/02/02	12/02/02	Matthew Zavislak

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-803	12/02/02	12/02/02	James O'Shea
2002-011-804	12/02/02	12/02/02	Sarah Dentan
2002-011-805	12/02/02	12/02/02	Robert Doiel
2002-011-806	12/02/02	12/02/02	Clarissa Smith
2002-011-807	12/03/02	12/03/02	Pat Court
2002-011-808	12/03/02	12/03/02	Robert Epp
2002-011-809	12/03/02	12/03/02	Nancy Moore
2002-011-810	12/03/02	12/03/02	Ryan Redding
2002-011-811	12/03/02	12/03/02	Knud Jensen
2002-011-812	12/03/02	12/03/02	Marijah Sroczynski
2002-011-813	12/03/02	12/03/02	Frances O'Dell
2002-011-814	12/03/02	12/03/02	Barbara Glover
2002-011-815	12/03/02	12/03/02	Cindy Konovitz
2002-011-816	12/03/02	12/03/02	Allen Corben
2002-011-817	12/03/02	12/03/02	Liberte Reinke
2002-011-818	12/03/02	12/03/02	Rebecca Malin
2002-011-819	12/03/02	12/03/02	Joan Bueter
2002-011-820	12/03/02	12/03/02	Patrick McKee
2002-011-821	12/03/02	12/03/02	Nancie McBride
2002-011-822	12/03/02	12/03/02	Mark Holman
2002-011-823	12/03/02	12/03/02	Monica Irlbacher

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-824	12/03/02	12/03/02	Christine Gladish
2002-011-825	12/03/02	12/03/02	Florence Dollard
2002-011-826	12/03/02	12/03/02	Adam Key
2002-011-827	12/03/02	12/03/02	Joshua Lubarr
2002-011-828	12/03/02	12/03/02	Don Fessenden III
2002-011-829	12/03/02	12/03/02	Joseph Hernandez
2002-011-830	12/03/02	12/03/02	Sheila Sullivan
2002-011-831	12/03/02	12/03/02	Rita Moss
2002-011-832	12/03/02	12/03/02	Oliver Dickerson
2002-011-833	12/03/02	12/03/02	Judy Reynolds
2002-011-834	12/03/02	12/03/02	David Lee
2002-011-835	12/03/02	12/03/02	Laura Bowser
2002-011-836	12/03/02	12/03/02	Susan Kendall
2002-011-837	12/03/02	12/03/02	Donna Hodge
2002-011-838	12/03/02	12/03/02	Kenneth Aydlott
2002-011-839	12/03/02	12/03/02	Jessica Hensley
2002-011-840	12/03/02	12/03/02	Randy Deninno
2002-011-841	12/03/02	12/03/02	Stephen Galla
2002-011-842	12/03/02	12/03/02	Michelle Zafron
2002-011-843	12/03/02	12/03/02	Henry Gozdz

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-844	12/03/02	12/03/02	Jeff Clark
2002-011-845	12/04/02	12/04/02	Robert Mykoff
2002-011-846	12/04/02	12/04/02	Daniel Copeland
2002-011-847	12/04/02	12/03/02	Matthew Klein
2002-011-848	12/04/02	12/03/02	Yannick Rendu
2002-011-849	12/03/02	12/03/02	John Davenport
2002-011-850	12/03/02	12/03/02	Daniel McCarley
2002-011-851	12/03/02	12/03/02	Black Hawk
2002-011-852	12/03/02	12/03/02	Harry Hickey
2002-011-853	12/03/02	12/03/02	Abigail Plumb
2002-011-854	12/03/02	12/03/02	Sam Seeley
2002-011-855	12/03/02	12/03/02	K. Martin Stevenson
2002-011-856	12/03/02	12/03/02	George Gilsinan
2002-011-857	12/03/02	12/03/02	Calvin Smith
2002-011-858	12/03/02	12/03/02	Marylaine Block
2002-011-859	12/03/02	12/03/02	Cheryl Nabati
2002-011-860	12/03/02	12/03/02	Robert Dale
2002-011-861	12/03/02	12/03/02	Brian Haynes
2002-011-862	12/03/02	12/03/02	Robert Smith
2002-011-863	12/03/02	12/03/02	Gene McNay

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-864	12/03/02	12/03/02	George Klopff
2002-011-865	12/03/02	12/03/02	Rachel Bode
2002-011-866	12/03/02	12/03/02	Jeffrey Palmer
2002-011-867	12/03/02	12/03/02	Jacqueline Paynter
2002-011-868	12/03/02	12/03/02	Nicholas Minton
2002-011-869	12/03/02	12/03/02	Audrey Koscielniak
2002-011-870	12/03/02	12/03/02	Paul-Alexander Crystal
2002-011-871	12/03/02	12/03/02	Kathryn C. Young
2002-011-872	12/03/02	12/03/02	Norman Karlow
2002-011-873	12/04/02	12/04/02	Jeffrey Stults
2002-011-874	12/04/02	12/04/02	Carol Greenholz
2002-011-875	12/04/02	12/04/02	Mark Shvets
2002-011-876	12/04/02	12/04/02	Charles Barber
2002-011-877	12/04/02	12/04/02	John Bekas, Jr.
2002-011-878	12/04/02	12/04/02	Robert Altenburg
2002-011-879	12/04/02	12/04/02	Sheryl Soborowski
2002-011-880	12/04/02	12/04/02	Matthew Starzewski
2002-011-881	12/04/02	12/04/02	Rob Halford
2002-011-882	12/04/02	12/04/02	Debra Wooldridge
2002-011-883	12/04/02	12/04/02	Leslie Foster
2002-011-884	12/04/02	12/04/02	Glen Zorn

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-885	12/04/02	12/04/02	David Miller
2002-011-886	12/04/02	12/04/02	Ellen Knight
2002-011-887	12/04/02	12/04/02	Eric Klucas
2002-011-888	12/04/02	12/04/02	Charles Hall
2002-011-889	12/04/02	12/04/01	Atifa Rawan
2002-011-890	12/04/02	12/04/02	David Besch
2002-011-891	12/04/02	12/04/02	Mark Rowe
2002-011-892	12/04/02	12/04/02	Thomas Haviland
2002-011-893	12/04/02	12/04/02	Marcia Baker
2002-011-894	12/04/02	12/04/02	Jean Hessenauer
2002-011-895	12/04/02	12/04/02	Luis Arauz
2002-011-896	12/04/02	12/04/06	Jan Goldsmith
2002-011-897	12/04/02	12/04/02	Dyrnda Johnson
2002-011-898	12/04/02	12/04/02	Adam Tilghman
2002-011-899	12/04/02	12/04/02	Sarah Mercure
2002-011-900	12/05/02	12/05/02	Bob Claitor
2002-011-901	12/04/02	12/04/02	Joseph Titus
2002-011-902	12/04/02	12/04/02	Anthony Giannini
2002-011-903	12/04/02	12/04/02	Chris Christopherson
2002-011-902	12/04/02	12/04/02	Lawrence Chang
2002-011-905	12/04/02	12/04/02	ronald Colman

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-906	12/04/02	12/04/02	Derek Baker
2002-011-907	12/04/02	12/04/02	Laura Conover
2002-011-908	12/04/02	12/04/02	David paul
2002-011-909	12/04/02	12/04/02	Eric Wayte
2002-011-910	12/04/02	12/04/02	Dierdre Freamon
2002-011-911	12/04/02	12/04/02	Galen Davis
2002-011-912	12/04/02	12/04/02	James Roach
2002-011-913	12/04/02	12/04/02	Cassandra Willis
2002-011-914	12/04/02	12/04/02	Marcia Siebesma
2002-011-915	12/04/02	12/04/02	Bryan Lynch
2002-011-916	12/04/02	12/04/02	Morgan Evans
2002-011-917	12/04/02	12/04/02	Doyle Myers
2002-011-918	12/04/02	12/04/02	Larry Korbein
2002-011-919	12/04/02	12/04/02	Greg Ballinger
2002-011-920	12/04./02	12/04/02	Ralph Jones
2002-011-921	12/04/02	12/04/02	Dorothy Hampton
2002-011-922	12/04/02	12/04/02	Eilhu Gerson
2002-011-923	12/05/02	12/05/02	Michael Beck
2002-011-924	12/05/02	12/05/02	Michael Stickel
2002-011-925	12/05/02	12/05/02	Betty Boyd
2002-011-926	12/05/02	12/05/02	Anne Birkam

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-927	12/05/02	12/05/02	John Curtis
2002-011-928	12/05/02	12/05/02	Jeff Appelhans
2002-011-929	12/05/02	12/05/02	Denise Garofalo
2002-011-930	12/05/02	12/05/02	Beth Clausen
2002-011-931	12/05/02	12/05/02	Kim tomblin
2002-011-932	12/05/02	12/05/02	Catherine Morse
2002-011-933	12/05/02	12/05/02	Dave Shannon
2002-011-934	12/05/02	12/05/02	William Bradshaw
2002-011-935	12/05/02	12/05/02	Carol Pijacki
2002-011-936	12/05/02	12/05/02	Judy Meadows
2002-011-937	12/05/02	12/05/02	Chuck Malone
2002-011-938	12/05/02	12/05/02	Lowe Leland
2002-011-939	12/05/02	12/05/02	Stephen Jordan
2002-011-940	12/05/02	12/05/02	Mary Cahn
2002-011-941	12/05/02	12/05/02	Gregory Peters
2002-011-942	12/05/02	12/05/02	Shawn Powell
2002-011-943	12/05/02	12/05/02	Sarah Peters
2002-011-944	12/05/02	12/05/02	Christopher Hall
2002-011-945	12/05/02	12/05/02	Steve Marquardt
2002-011-946	12/05/02	12/05/02	Sofia Tangalos
2002-011-947	12/05/02	12/05/02	Louis Davis

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-948	12/05/02	12/05/02	Christopher Hoover
2002-011-949	12/05/02	12/05/02	Jane Whiteside
2002-011-950	12/05/02	12/05/02	John Jack
2002-011-951	12/05/02	12/05/02	Matthew Shaw
2002-011-952	12/05/02	12/05/02	Janet Wamsley
2002-011-953	12/05/02	12/05/02	Joseph Horgan
2002-011-954	12/05/02	12/05/02	Ken brown
2002-011-955	12/05/02	12/05/02	S. thompson
2002-011-956	12/05/02	12/05/02	Chris Ryan
2002-011-957	12/05/02	12/05/02	John Rinderle
2002-011-958	12/05/02	12/05/02	Keith Jeffrey
2002-011-959	12/05/02	12/05/02	Monica Kirby
2002-011-960	12/05/02	12/05/02	Julie Blankenburg
2002-011-961	12/05/02	12/05/02	Ben Embree
2002-011-962	12/05/02	12/05/02	Jonathan Boutelle
2002-011-963	12/05/02	12/05/02	Susan Nevelow mart
2002-011-964	12/05/02	12/05/02	Carol Spector
2002-011-965	12/05/02	12/05/02	Thomas Mawson
2002-011-966	12/05/02	12/05/02	Samuel Smith
2002-011-967	12/05/02	12/05/02	Nathaniel West
2002-011-968	12/05/02	12/05/02	Hussein Kanji

2002-011-969	12/05/02	12/05/02	Sandra Ewen
2002-011-970	12/05/02	12/05/02	Richard Tietjen
2002-011-971	12/05/02	12/05/02	Eugene Dean
2002-011-972	12/05/02	12/05/02	Leo Ahumanda
2002-011-973	12/05/02	12/05/02	Andrew Hrubik
2002-011-974	12/05/02	12/05/02	Walter Susong
2002-011-975	12/05/02	12/05/02	Jonathan beckel
2002-011-976	12/05/02	12/05/02	Darrell Maronde
2002-011-977	12/05/02	12/05/02	Kevin Keeney
2002-011-978	12/06/02	12/05/02	Lawrence Leventhal
2002-011-979	12/06/02	12/05/02	Andrew Rysavy
2002-011-980	12/06/02	12/06/02	Nicole Cuadra
2002-011-981	12/06/02	12/05/02	Joelson Deguzman
2002-011-982	12/06/02	12/05/02	Stephen Brannen
2002-011-983	12/06/02	12/06/02	Paul T. Jackson
2002-011-984	12/06/02	12/06/02	Justin Graham
2002-011-985	12/06/02	12/06/02	Todd Lovette
2002-011-986	12/06/02	12/06/02	Robert Fagg
2002-011-987	12/06/02	12/06/02	Jason Pullara
2002-011-988	12/06/02	12/06/02	Alfred Frisch
2002-011-989	12/06/02	12/06/02	William Evans
2002-011-990	12/06/02	12/06/02	Neil Hodge

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-991	12/06/02	12/06/02	laura Sare
2002-011-992	12/06/02	12/06/02	Eric Windisch
2002-011-993	12/06/02	12/06/02	Audrey Hall
2002-011-994	12/06/02	12/06/02	Nathan Labadie
2002-011-995	12/06/02	12/06/02	Michael Cooper
2002-011-996	12/06/02	12/06/02	Jonathan Sellers
2002-011-997	12/06/02	12/06/02	David Vedder
2002-011-998	12/06/02	12/06/02	Edward Simmonds
2002-011-999	12/06/02	12/06/02	Javier Jones
2002-011-1000	12/06/02	12/06/02	Ken Lubar
2002-011-1001	12/06/02	12/06/02	Mark Budzyn
2002-011-1002	12/06/02	12/06/02	Dustin C. Owen
2002-011-1003	12/06/02	12/06/02	Scott Vickers
2002-011-1004	12/06/02	12/06/02	Annice Butler
2002-011-1005	12/06/02	12/06/02	David Killion
2002-011-1006	2/06/02	12/06/02	Michael Briggs
2002-011-1007	12/06/02	12/06/02	Alex Mauer
2002-011-1008	12/06/02	12/06/02	Donald Zillotto
2002-011-1009	12/06/02	12/06/02	Mark Trynor
2002-011-1110	12/06/02	12/06/02	Christopher Cowan
2002-011-1011	12/06/02	12/06/02	John Giotta

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1012	12/06/02	12/06/02	Mark Notarus
2002-011-1013	12/06/02	12/06/02	Douglas Lewis
2002-011-1014	12/06/02	12/06/02	Palmen Miltenoff
2002-011-1015	12/06/02	12/06/02	Connie Salyers
2002-011-1016	12/06/02	12/06/02	Alinia Asmundson
2002-011-1017	12/06/02	12/06/02	Jum Hines
2002-011-1018	12/06/02	12/06/02	Ryan Sharpe
2002-011-1019	12/06/02	12/06/02	Lila Faulkner
2002-011-1020	12/06/02	12/06/02	Gia Maddry
2002-011-1021	12/07/02	12/07/02	Marc Daniel
2002-011-1022	12/06/02	12/06/02	James Walsh
2002-011-1023	12/06/02	12/06/02	Andrew Lansford
2002-011-1024	12/06/02	12/06/02	John Drabik
2002-011-1025	12/06/02	12/06/02	Brian Dunnette
2002-011-1026	12/06/02	12/06/02	George Harrington
2002-011-1027	12/06/02	12/06/02	Josah Sisk
2002-011-1028	12/06/02	12/06/02	Mark Sebree
2002-011-1029	12/06/02	12/06/02	Amy Madigan
2002-011-1030	12/07/02	12/07/02	Neil Bowers
2002-011-1031	12/06/02	12/06/02	Anthony Schwickerath
2002-011-1032	12/06/02	12/06/02	Jeff Sloand

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1033	12/06/02	12/06/02	Carmen Hoffman
2002-011-1034	12/06/02	12/06/02	Michael Smith
2002-011-1035	12/06/02	12/06/02	David Gabler
2002-011-1036	12/06/02	12/06/02	Marcus Sellers
2002-011-1037	12/07/02	12/06/02	Michael Schuyler
2002-011-1038	12/06/02	12/06/02	Tom Wekell
2002-011-1039	12/06/02	12/06/02	David Anders
2002-011-1040	12/06/02	12/06/02	Daniel Feinstein
2002-011-1041	12/06/02	12/06/02	James Karaganis
2002-011-1042	12/06/02	12/06/02	David Clark
2002-011-1043	2/06/02	12/06/02	Robert Stenber
2002-011-1044	2/06/02	12/06/02	Amy Salo
2002-011-1045	2/06/02	12/06/02	Joseph Hernandez
2002-011-1046	12/06/02	12/06/02	Darrell Black
2002-011-1047	12/06/02	12/06/02	Andrew Romeril
2002-011-1048	12/06/02	12/07/02	Steve White
2002-011-1049	12/06/02	12/06/02	Catherine Jefferson
2002-011-1050	12/06/02	12/06/02	Robert Lyle
2002-011-1051	12/06/02	12/06/02	William Arneson
2002-011-1052	12/06/02	12/06/02	David Huseth
2002-011-1053	12/06/02	12/06/02	David Dahl

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1054	12/06/02	12/06/02	Joseph Heck
2002-011-1055	12/06/02	12/06/02	Arthur hayden
2002-011-1056	12/06/02	12/07/02	Brian Pugh
2002-011-1057	12/07/02	12/07/02	Christopher French
2002-011-1058	12/07/02	12/07/02	Brett Sayles
2002-011-1059	12/07/02	12/07/02	Robert Fisher
2002-011-1060	12/10/02	12/10/02	Brad Oaks
2002-011-1061	12/07/02	12/07/02	Darlene Wyndon
2002-011-1062	12/07/02	12/07/02	Chris Demisch
2002-011-1063	12/07/02	12/07/02	William Ellsworth
2002-011-1064	12/07/02	12/07/02	Cliff DeWitt
2002-011-1065	12/07/02	12/07/02	Erik Carlseen
2002-011-1066	12/07/02	12/07/02	Theodore Stevko
2002-011-1067	12/07/02	12/07/02	Robert Brunson
2002-011-1068	12/07/02	12/07/02	Jason Heyd
2002-011-1069	12/07/02	12/07/02	Heather Undewood
2002-011-1070	12/07/02	12/07/02	Norman Council
2002-011-1071	12/07/02	12/07/02	Michael Kilcullen
2002-011-1072	12/07/02	12/07/02	John Kohler
2002-011-1073	12/07/02	12/07/02	Julio Orellano
2002-011-1074	12/07/02	12/07/02	Theodore Borreso

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commente</u>
2002-011-1075	12/07/02	12/07/02	Todd Robinson
2002-011-1076	12/07/02	12/07/02	Ann Hatch
2002-011-1077	12/07/02	12/07/02	Robert 79rris
2002-011-1078	12/07/02	12/07/02	Shawn Yeager
2002-011-1079	12/07/02	12/07/02	Jason Jelinek
2002-011-1080	12/07/02	12/07/02	Dudley Myer
2002-011-1081	12/07/02	12/07/02	William Plantick
2002-011-1082	12/07/02	12/07/02	Cameron Henneke
2002-011-1083	12/07/02	12/07/02	Taz Rempel
2002-011-1084	12/07/02	12/07/02	Sarah Mercure
2002-011-1085	12/07/02	12/07/02	Rob Hemmick
2002-011-1086	12/07/02	12/07/02	John Yost
2002-011-1087	12/07/02	12/07/02	Kevin Sweeney
2002-011-1088	12/07/02	12/07/02	Bernie Case
2002-011-1089	12/07/02	12/07/02	Chris Bono
2002-011-1090	12/07/02	12/07/02	Regina Hamaker
2002-011-1091	12/07/02	12/07/02	George Moilinski
2002-011-1092	12/07/02	12/07/02	John Vermaes
2002-011-1093	12/07/02	12/07/02	Heather Lewis
2002-011-1094	12/07/02	12/07/02	Noel Shrum
2002-011-1095	12/07/02	12/07/02	Alton Brantley

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1096	12/07/02	12/07/02	Patrick Owens
2002-011-1097	12/07/02	12/07/02	Gary Miller
2002-011-1098	12/07/02	12/07/02	Carol Wahrer
2002-011-1099	12/07/02	12/07/02	Benjamin Williamson
2002-011-1100	12/07/02	12/07/02	Phillip Zampino
2002-011-1101	12/07/02	12/07/02	Michael Greene
2002-011-1102	12/07/02	12/07/02	John Welch
2002-011-1103	12/07/02	12/07/02	Joseph Crowle
2002-011-1104	12/07/02	12/07/02	Joseph Zapert
2002-011-1105	12/07/02	12/07/02	Craig Paluszcyk
2002-011-1106	12/07/02	12/07/02	Jeremy Saperstein
2002-011-1107	12/07/02	12/07/02	Jason Smetters
2002-011-1108	12/07/02	12/07/02	Gregory Zapf
2002-011-1109	12/07/02	12/07/02	David Waggoner
2002-011-1110	12/07/02	12/07/02	Matthew Strait
2002-011-1111	12/07/02	12/07/02	Yakov Shafranovic
2002-011-1112	12/07/02	12/08/02	Steven Sloss
2002-011-1113	12/08/02	12/07/02	Joshua Lenz
2002-011-1114	12/08/02	12/08/02	David Marcovsky
2002-011-1115	12/08/02	12/08/02	Sean McClung
2002-011-1116	12/08/02	12/08/02	Charles Upson

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1117	12/11/02	12/11/02	Ansley Barnes
2002-011-1118	12/08/02	12/08/02	Margaret Russell
2002-011-1119	12/08/02	12/08/02	Richelle Siniard
2002-011-1120	12/08/02	12/08/02	Stephen Gilmer
2002-011-1121	12/08/02	12/08/02	Rickey Ramse
2002-011-1122	12/08/02	12/08/02	Laurie Forti
2002-011-1123	12/08/02	12/08/02	Suzanne Colliga
2002-011-1124	12/08/02	12/08/02	James Carey
2002-011-1125	12/08/02	12/08/02	Deb Carver
2002-011-1126	12/08/02	12/08/02	Michael McLain
2002-011-1127	12/08/02	12/08/02	Paul Westervelt
2002-011-1128	12/08/02	12/08/02	Eric Ries
2002-011-1129	12/08/02	12/08/02	Ellen Jamieson
2002-011-1130	12/08/02	12/08/02	Matthew Makowka
2002-011-1131	12/08/02	12/08/02	Chad Russell
2002-011-1132	12/08/02	12/08/02	Zachary Holmes
2002-011-1133	12/08/02	12/08/02	Rob Richards
2002-011-1134	12/08/02	12/08/02	Abraham Pearson
2002-011-1135	12/08/02	12/08/02	Dennis Turner
2002-011-1136	12/09/02	12/09/02	Steve Foxx
2002-011-1137	12/09/02	12/09/02	Nathan Moore

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1138	12/09/02	12/09/02	Stephen Colson
2002-011-1138	12/09/02	12/09/02	Keith Moore
2002-011-1139	12/09/02	12/09/02	Evan Hill-Rise
2002-011-1140	12/09/02	12/09/02	Averil Jane Townsley
2002-011-1141	12/09/02	12/09/02	Steve Richardson
2002-011-1142	12/09/02	12/09/02	Shamim Islam
2002-011-1143	12/09/02	12/09/02	Gregory Whalin
2002-011-1144	12/09/02	12/09/02	Brianna Huber
2002-011-1145	12/09/02	12/09/02	Elizabeth Caulfield
2002-011-1146	12/09/02	12/09/02	Roger Jacobs
2002-011-1147	12/09/02	12/09/02	Libby Young
2002-011-1148	12/09/02	12/09/02	Steve Beleu
2002-011-1149	12/09/02	12/09/02	Kevin Cramer
2002-011-1150	12/09/02	12/09/02	Eric Shupps
2002-011-1152	12/11/02	12/11/02	Sean Middleditch
2002-011-1153	12/09/02	12/09/02	Connie Reik
2002-011-1154	12/09/02	12/09/02	David Vanthournout
2002-011-1155	12/09/02	12/09/02	Abigail Al-Doory
2002-011-1156	12/09/02	12/09/02	Justin Miller
2002-011-1157	12/09/02	12/09/02	Chad Bisk
2002-011-1158	12/09/02	12/09/02	Regina Raboin

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1159	12/09/02	12/09/02	Earlene Kuester
2002-011-1160	12/09/02	12/06/02	Pageen Bassett
2002-011-1161	12/09/02	12/09/02	Karen Johnson
2002-011-1162	12/09/02	12/09/02	Cyrus Yunker
2002-011-1163	12/09/02	12/09/02	Peter Schroeder
2002-011-1164	12/09/02	12/09/02	Rebekah Maxwell
2002-011-1165	12/09/02	12/09/02	Elizabeth LeDoux
2002-011-1166	12/09/02	12/09/02	Fritz Herrick
2002-011-1167	12/09/02	12/09/02	David Goldberg
2002-011-1168	12/09/02	12/09/02	Lucia Orlando
2002-011-1169	12/09/02	12/09/02	Edward Lemon
2002-011-1170	12/09/02	12/09/02	Melanie Brazzell
2002-011-1171	12/09/02	12/09/02	Lautretz Moore
2002-011-1172	12/09/02	12/09/02	Maria Guye
2002-011-1173	12/09/02	12/09/02	Joseph Goldberg
2002-011-1174	12/09/02	12/09/02	Mindy Goldberg
2002-011-1175	12/09/02	12/09/02	Richard Lotz
2002-011-1176	12/09/02	12/09/02	Paul Ford
2002-011-1177	12/09/02	12/09/01	Evan Martin
2002-011-1178	12/09/02	12/09/02	Barbara Goldberg
2002-011-1179	12/09/02	12/09/02	Jessie Hirsch

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1180	12/09/02	12/09/02	Jason Charrier
2002-011-1181	12/09/02	12/09/02	Patrick McFadden
2002-011-1182	12/09/02	12/09/02	Jasmine Hopkins
2002-011-1183	12/09/02	12/09/02	Jeanne Pfander
2002-011-1184	12/09/02	12/09/02	Erik Hustad
2002-011-1185	12/09/02	12/09/02	Mike Goldstein
2002-011-1186	12/09/02	12/09/02	Robin Crawford
2002-011-1187	12/09/02	12/09/02	Travis Beck
2002-011-1188	12/09/02	12/09/02	Daniel Dillman
2002-011-1189	12/09/02	12/09/02	Michael Nelson
2002-011-1190	12/09/02	12/09/02	Devon DeLapp
2002-011-1191	12/09/02	12/09/02	Vineet Kumar
2002-011-1192	12/09/02	12/09/02	Benjamin Benigno
2002-011-1193	12/10/02	12/09/02	Brian Durham
2002-011-1194	12/10/02	12/10/02	Neal Fultz
2002-011-1195	12/10/02	12/10/02	Elaine Hoffman
2002-011-1196	12/10/02	12/10/02	Tasha Walston
2002-011-1197	12/10/02	12/10/02	Calvin Thorne
2002-011-1198	12/10/02	12/10/02	Gail Saunders
2002-011-1199	12/10/02	12/10/02	Susan Hughes
2002-011-1200	12/10/02	12/10/02	Barbara Bell

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1201	12/10/02	12/10/02	Mike Jeffries
2002-011-1202	12/10/02	12/10/02	Elizabeth Al-Doory
2002-011-1203	12/10/02	12/10/02	Marvin Eads
2002-011-1204	12/11/02	12/11/02	Caishnah Begg
2002-011-1205	12/10/02	12/10/02	Sue L. Center
2002-011-1206	12/11/02	12/11/02	Valerie Glenn
2001-011-1207	12/10/02	12/10/02	Jeffrey Townshend
2002-011-1208	12/10/02	12/10/02	Mark Berwind
2002-011-1209	12/10/02	12/10/02	Scott Morgan
2002-011-1210	12/10/02	12/10/02	Kent Collins
2002-011-1211	12/10/02	12/10/02	Margaret Balfour
2002-011-1212	12/10/02	12/10/02	Adria Olmi
2002-011-1213	12/10/02	12/10/02	David Cammack
2002-011-1214	12/10/02	12/10/02	Simon Hill
2002-011-1215	12/10/02	12/10/02	Alice Kober
2002-011-1216	12/10/02	12/09/02	Nancy Buckland
2002-011-1217	12/10/02	12/10/02	Eric Ryan
2002-011-1218	12/10/02	12/10/02	Carey Camazine
2002-011-1219	12/10/02	12/10/02	Erik West
2002-011-1220	12/10/02	12/10/02	Alan Zoellner
2002-011-1221	12/11/02	12/11/02	Robert Campbell

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1222	12/11/02	12/11/02	Nathan Hellmers
2002-011-1223	12/11/02	12/11/02	Luis Acosta
2002-011-1224	12/11/02	12/11/02	Thomas Belote
2002-011-1225	12/11/02	12/11/02	Vernon Leighton
2002-011-1226	12/11/02	12/11/02	Georgia Chadwick
2002-011-1227	12/11/02	12/11/02	FTC
2002-011-1228	12/10/02	12/10/02	Larry Jarvis
2002-011-1229	12/11/02	12/11/02	Neill Miller
2002-011-1230	12/11/02	12/11/02	Sulbha Swati Wagh
2002-011-1231	12/11/02	12/11/02	Heidi Petersen
2002-011-1232	12/11/02	12/11/02	Kimberly Pinion
2002-011-1233	12/11/02	12/11/02	Matthew Marsteller
2002-011-1234	12/11/02	12/11/02	Barbara Lewis
2002-011-1235	12/11/02	12/11/02	Richard Spisak
2002-011-1236	12/11/02	12/11/02	Ask Bjoern Hansen
2002-011-1237	12/11/02	12/11/02	Christopher Kain
2002-011-1238	12/11/02	12/11/02	Benjamin Cooper
2002-011-1239	12/06/02	12/11/02	David Rogers
2002-011-1240	12/11/02	12/11/02	Nancy Luzer
2002-011-1241	12/11/02	12/11/02	Krista Rudd
2002-011-1242	12/11/02	12/11/02	Ceceila Petro

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1243	12/11/02	12/11/02	Patrick Cannon
2002-011-1244	12/11/02	12/11/02	Mardi Mahaffy
2002-011-1245	12/11/02	12/11/02	Rosemary Campagna
2002-011-1246	12/11/02	12/11/02	Michelle Bagley
2002-011-1247	12/11/02	12/11/02	Jennifer Smith
2002-011-1248	12/11/02	12/11/02	Elaine Didier
2002-011-1249	12/11/02	12/11/02	Eric Dahlen
2002-011-1250	12/11/02	12/11/02	William Cramer
2002-011-1251	12/11/02	12/11/02	Diedre Freamon
2002-011-1252	12/11/02	12/11/02	Timothy Trice
2002-011-1253	12/11/02	12/11/02	Karrie Peterson
2002-011-1254	12/12/02	12/12/02	David Mizener
2002-011-1255	12/12/02	12/12/02	Eric Ewald
2002-011-1256	12/12/02	12/12/02	Robert Elshire
2002-011-1257	12/12/02	12/12/02	Penelope Johnson
2002-011-1258	12/12/02	12/12/02	Sandra Williams
2002-011-1259	12/12/02	12/12/02	Diana Cleborne
2002-011-1260	12/12/02	12/12/02	Jocelyn Yeo
2002-011-1261	12/12/02	12/12/02	Ryan Brown
2002-011-1262	12/12/02	12/12/02	Justin White
2002-011-1263	12/12/02	12/12/02	Lloyd W. Pratsch

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1264	12/12/02	12/12/02	Sarah Haman
2002-011-1265	12/12/02	12/12/02	Harold Kearsley
2002-011-1266	12/12/02	12/12/02	Jonathan Betz-Zall
2002-011-1267	12/12/02	12/12/02	Michele Finerty
2002-011-1268	12/12/02	12/12/02	Geoffrey Davidson
2002-011-1269	12/12/02	12/12/02	Gregory Petersen
2002-011-1270	12/12/02	12/12/02	Daniel Reimann
2002-011-1271	12/12/02	12/12/02	Chadd Horanburg
2002-011-1272	12/12/02	12/12/02	Sean Shappell
2002-011-1273	12/12/02	12/12/02	Chris Ely
2002-011-1274	12/12/02	12/12/02	Richard Frey
2002-011-1275	12/12/02	12/11/02	Jacqueline Fralley
2002-011-1276	12/12/02	12/11/02	Dennis Lott
2002-011-1277	12/11/02	12/11/02	John Crow
2002-011-1278	12/12/02	12/12/02	Paul Hatcher
2002-011-1279	12/12/02	12/12/02	Patricia White
2002-011-1280	12/12/02	12/12/02	Katie Hodge
2002-011-1281	12/13/02	12/13/02	Printing Industries of America, Inc.
2002-011-1282	12/13/02	12/13/02	Robert A. Walter
2002-011-1283	12/13/02	12/13/02	Alford Thomas
2002-011-1284	12/13/02	12/13/02	Earl Bley

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1285	12/13/02	12/13/02	Joshua collom
2002-011-1286	12/13/02	12/13/02	Peter Vachuska
2002-011-1287	12/13/02	12/13/02	Brody Hurst
2002-011-1288	12/12/02	12/12/02	Bryan Johns
2002-011-1289	12/12/02	12/12/02	John Rulnick
2002-011-1290	12/12/02	12/12/02	Jill Vassilakos-Long
2002-011-1291	12/12/02	12/02/02	David McFadden
2002-011-1292	12/12/02	12/12/02	Greg Haines
2002-011-1293	12/12/02	12/12/02	Paula Kaczmarek
2002-011-1294	12/12/02	12/12/02	Margaret Axtmann
2002-011-1295	12/12/02	12/12/02	Lynn Reasoner
2002-011-1296	12/12/02	12/12/02	Catherine Lemann
2002-011-1297	12/12/02	12/12/02	Michele McKnelly
2002-011-1298	12/12/02	12/12/02	Christopjer Thiry
2002-011-1299	12/12/02	12/12/02	Deborah Mongeau
2002-011-1300	12/12/02	12/12/02	Charles Dyer
2002-011-1301	12/12/02	12/12/02	Lisa Nickum
2002-011-1302	12/12/02	12/12/02	Greg Ringer
2002-011-1303	12/12/02	12/12/02	Ronald Lessard
2002-011-1304	12/12/02	12/12/02	Leonard Heyman
2002-011-1305	12/12/02	12/12/02	Gabriel Pill-Kah

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1306	12/12/02	12/12/02	OMB
2002-011-1307	12/12/02	12/12/02	Rosanne Cordell
2002-011-1308	12/12/02	12/12/02	Bruce Jensen
2002-011-1309	12/13/02	12/13/02	U.S. Chamber of Commerce
2002-011-1310	12/13/02	12/10/02	Brenda Barnes
2002-011-1311	12/13/03	12/13/03	Linda Chia
2002-011-1312	12/13/02	12/13/02	William Wise
2002-011-1313	12/13/02	12/13/02	Bennett Prescott
2002-011-1314	12/13/02	12/13/02	Mark Rosenstein
2002-011-1315	12/13/03	12/13/02	Nick Kaczmarek
2002-011-1316	12/13/02	12/13/02	Ann E. Miller
2002-011-1317	12/13/02	12/13/02	Amy Ferguson
2002-011-1318	12/13/02	12/13/02	U.S. Government Printing Office
2002-011-1319	12/12/02	12/12/02	Frederic G. Antoun, Jr.
2002-011-1320	12/13/02	12/13/02	Small Agency Council
2002-011-1321	12/13/02	12/13/02	Donald Dilks
2002-011-1322	12/13/02	12/13/02	Contract Services of America
2002-011-1323	12/13/02	12/13/02	Jason Cluggish
2002-011-1324	12/13/02	12/13/02	Jared Hudson

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1325	12/13/02	12/13/02	Arlene Weible
2002-011-1326	12/13/02	12/13/02	Bruce Buillis
2002-011-1327	12/13/02	12/13/02	William E. O'Brien
2002-011-1328	12/13/02	12/13/02	Paul Andrel
2002-011-1329	12/13/02	12/13/02	Jim cook
2002-011-1330	12/13/02	12/13/02	Ryan Weiss
2002-011-1331	12/13/02	12/13/02	John Lange
2002-011-1332	12/13/02	12/13/02	Marie Bellows
2002-011-1333	12/13/02	12/13/02	Elliott Shelkrot
2002-011-1334	12/13/02	12/13/02	Peter Menning
2002-011-1335	12/13/02	12/13/02	Chris Adams
2002-011-1336	12/13/02	12/13/02	Leah Sandwell-Weiss
2002-011-1337	12/13/02	12/13/02	Ben Hengst
2002-011-1338	12/13/02	12/13/02	Karen Westwood
2002-011-1339	12/13/02	12/13/02	Greg Goddard
2002-011-1340	12/13/02	12/13/02	National Archives and Records Administration
2002-011-1341	12/13/02	12/13/02	Interagency Council on Printing and Publications Services
2002-011-1342	12/13/02	12/13/02	Sharman B. Smith
2002-011-1343	12/13/02	12/13/02	Randall bacon

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1344	12/13/02	12/13/02	Anthony Zagami
2002-011-1345	12/13/02	12/13/02	Jason Hill
2002-011-1346	12/13/02	12/13/02	Steve Smieschek
2002-011-1347	12/13/02	12/13/02	Frederic G. Antoun, Jr.
2002-011-1348	12/13/02	12/13/02	Barbara Norelli
2002-011-1349	12/13/02	12/13/02	William Beegle
2002-011-1350	12/13/02	12/13/02	Ann E. Miller
2002-011-1351	12/13/02	12/13/02	Anthony Hood
2002-011-1352	12/13/02	12/13/02	Gwendolyn Cowan
2002-011-1353	12/13/02	12/13/02	Thomas M. Sullivan
2002-011-1354	12/13/02	12/13/02	Cynthia M. Pennino
2002-011-1355	12/13/02	12/13/02	James Reffell
2002-011-1356	12/13/02	12/13/02	Nancy Barrere
2002-011-1357	12/13/02	12/13/02	Brett Mitchell
2002-011-1358	12/13/02	12/13/02	SSA
2002-011-1359	12/13/02	12/13/02	DOJ
2002-011-1360	12/13/02	12/13/02	Lise Albury
2002-011-1361	12/13/02	12/13/02	Thomas Moore
2002-011-1362	12/13/02	12/13/02	Linda Kennedy
2002-011-1363	12/13/02	12/13/02	Patrice McDermott
2002-011-1364	12/13/02	12/13/02	Angie Felix

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1365	12/15/02	12/15/02	Chris Ryan
2002-011-1366	12/15/02	12/15/02	Bob Brown
2002-011-1367	12/13/02	12/13/02	Dee Emmerich
2002-011-1368	12/13/02	12/13/02	Michael Welch
2002-011-1369	12/13/02	12/13/02	Thomas Auentin
2002-011-1370	12/13/02	12/13/02	Bob Willard
2002-011-1371	12/13/02	12/13/02	Justin Darby
2002-011-1372	12/13/02	12/13/02	Krista Ainsworth
2002-011-1373	12/13/02	12/13/02	Nathan Bowman
2002-011-1374	12/13/02	12/13/02	Ann Unger
2002-011-1375	12/13/02	12/13/02	Brian Dunn
2002-011-1376	12/13/02	12/13/02	Joy Relton
2002-011-1377	12/13/02	12/13/02	Tom Zacharoff
2002-011-1378	12/13/02	12/13/02	Kathy Edwards
2002-011-1379	12/13/02	12/13/02	Ronald Morley
2002-011-1380	12/13/02	12/13/02	Russell Pearce
2002-011-1381	12/13/02	12/13/02	Karla Castetter
2002-011-1382	12/13/02	12/13/02	David Heiniluoma
2002-011-1383	12/13/02	12/13/02	Frank Clowes
2002-011-1384	12/13/02	12/13/02	Rex Fujikawa
2002-011-1385	12/13/02	12/13/02	Khan Sovithy

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1386	12/13/02	12/13/02	Matthew Chambers
2002-011-1387	12/13/02	12/13/02	Eric Freemantle
2002-011-1388	12/13/02	12/13/02	Val Trullinger
2002-011-1389	12/13/02	12/13/02	Chandler Morgan
2002-011-1390	12/14/02	12/14/02	Amy Fuelleman
2002-011-1391	12/14/02	12/14/02	Justin Bassett
2002-011-1392	12/14/02	12/14/02	Thomas Colburn, Jr.
2002-011-1393	12/14/02	12/14/02	David Caldwell
2002-011-1394	12/14/02	12/14/02	Jesse Michael
2002-011-1395	12/14/02	12/14/02	John Stanton, II
2002-011-1396	12/14/02	12/14/02	Jean-Philippe Langlois
2002-011-1397	12/14/02	12/14/02	Alok Khanna
2002-011-1398	12/14/02	12/14/02	Allen Waddell
2002-011-1399	12/14/02	12/14/02	Holly Mitchell
2002-011-1400	12/14/02	12/14/02	Michael Hubbard
2002-011-1401	12/13/02	12/13/02	Kelly Smythe
2002-011-1402	12/14/02	12/14/02	Darren Leno
2002-011-1403	12/14/02	12/14/02	Brian West
2002-011-1404	12/14/02	12/14/02	Todd Provancha
2002-011-1405	12/14/02	12/14/02	Ann Egerton
2002-011-1406	12/14/02	12/14/02	David Griffin

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1407	12/15/02	12/14/02	Nicholas Weikel
2002-011-1408	12/15/02	12/14/02	Ariel France
2002-011-1409	12/15/02	12/14/02	Larry Blaylock
2002-011-1410	12/15/02	12/14/02	Patrick Farabaugh
2002-011-1411	12/15/02	12/15/02	John Oakley
2002-011-1412	12/15/02	12/15/02	Anthony LaCova
2002-011-1413	12/15/02	12/15/02	John McMonagle
2002-011-1414	12/15/02	12/15/02	Brian Greenberg
2002-011-1415	12/15/02	12/15/02	Dennis Dively
2002-011-1416	12/15/02	12/15/02	Alessandro Abate
2002-011-1417	12/15/02	12/15/02	James Smith
2002-011-1418	12/15/02	12/15/02	Melanie Miller
2002-011-1419	12/15/02	12/15/02	Alexander Rudyk
2002-011-1420	12/15/02	12/15/02	Richard Shurgalla
2002-011-1421	12/15/02	12/15/02	Alik Widge
2002-011-1422	12/15/02	12/15/02	John DeFabio
2002-011-1423	12/15/02	12/15/02	William Sparkman
2002-011-1424	12/15/02	12/15/02	Brody Hurst
2002-011-1425	12/15/02	12/15/02	Rory Mellinger
2002-011-1426	12/15/02	12/15/02	Michael Roskin
2002-011-1427	12/15/02	12/15/02	Stephen McMillan

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1428	12/15/02	12/15/02	Jenny Berger
2002-011-1429	12/15/02	12/15/02	Zachary Beason
2002-011-1430	12/16/02	12/15/02	Matthew Agen
2002-011-1431	12/16/02	12/16/02	Aaron Kurtz
2002-011-1432	12/16/02	12/16/02	Michael Castleman
2002-011-1433	12/16/02	12/16/02	Anders Hofsten
2002-011-1434	12/13/02	12/13/02	Dan barkley
2002-011-1435	12/13/02	12/13/02	Douglas harbach
2002-011-1436	12/16/02	12/16/02	Cathy N. Hartmen
2002-011-1437	12/13/02	12/13/02	David Westerman
2002-011-1438	12/13/02	12/13/02	Derek Slater
2002-011-1439	12/13/02	12/13/02	Fred Sampson
2002-011-1440	12/13/02	12/13/02	NASA
2002-011-1441	12/16/02	12/06/02	Pegeen Bassett
2002-011-1442	12/16/02	12/16/02	Michael Walker
2002-011-1443	12/16/02	12/06/02	Gwen Sinclair
2002-011-1444	12/16/02	12/16/02	Robert Sheets
22002-011-1445	12/15/02	12/16/02	Catherine Swenson
2002-011-1446	12/16/02	12/16/02	Jeffri Frontz
2002-011-1447	12/16/02	12/16/02	Christopher Caldwell
2002-011-1448	12/16/02	12/16/02	Keith Menard

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
21002-011-1449	12/16/02	12/16/02	Chris Ingram
2002-011-1450	12/16/02	12/16/02	Sean Forbes
2002-011-1451	12/16/02	12/16/02	Chris Vesper
2002-011-1452	12/16/02	12/16/02	Francine Goldberg
2002-011-1453	12/16/02	12/16/02	Gerald Peterson
2002-011-1454	12/16/02	12/16/02	Kenneth Winke
2002-011-1455	12/16/02	12/16/02	David Andrade
2002-011-1456	12/16/02	12/16/02	Trey Harris
2002-011-1457	12/16/02	12/16/02	Michael Barnes
2002-011-1458	12/16/02	12/16/02	Gregory Walson
2002-011-1459	12/16/02	12/16/02	Jonathan Webb
2002-011-1460	12/16/02	12/16/02	David Lisch
2002-011-1461	12/16/02	12/16/02	Lawrence Peters
2002-011-1462	12/16/02	12/16/02	Eric Lynn
2002-011-1463	12/16/02	12/16/02	Wendy Zapert
2002-011-1464	12/16/02	12/16/02	Sean Jones
2002-011-1465	12/16/02	12/16/02	Chris Aquino
2002-011-1466	12/17/02	12/17/02	Carter brown
2002-011-1467	12/17/02	12/17/02	Beth Milliken
2002-011-1468	12/17/02	12/17/02	Luke Nelson
2002-011-1469	12/17/02	12/17/02	Ben DeGonzague

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1470	12/17/02	12/17/02	Michael Bernstein
2002-011-1471	12/17/02	12/17/02	David Lewis
2002-011-1472	12/17/02	12/17/02	Todd Pinkerton
2002-011-1473	12/17/02	12/17/02	John Hughes
2002-011-1474	12/17/02	12/17/02	AFB
2002-011-1475	12/18/02	12/17/02	Tim Smith
2002-011-1476	12/17/02	12/17/02	Gregory Hard
2002-011-1477	12/17/02	12/17/02	Benjamin Gross
2002-011-1478	12/17/02	12/17/02	David Power
2002-011-1479	12/17/02	12/17/02	Ron Nichols
2002-011-1480	12/17/02	12/17/02	Rohan Singh
2002-011-1481	12/17/02	12/17/02	Avery Roberts
2002-011-1482	12/17/02	12/12/02	HHS
2002-011-1483	12/17/02	12/13/02	Chamberof Commerce
2002-011-1484	12/17/02	12/17/02	NRC
2002-011-1485	12/18/02	12/18/02	Ann Grady
2002-011-1486	12/18/02	12/18/02	Benjamin Nehring
2002-011-1487	12/18/01	12/18/02	Robert Honerkamp
2002-011-1488	12/18/02	12/18/02	Sebastien Cormier
2002-011-1489	12/18/02	12/18/02	Bruce Hancock
2002-011-1490	12/18/02	12/18/02	IRS

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1491	12/18/02	12/18/02	Paul Traue, Jr.
2002-011-1492	12/18/02	12/18/02	Derek young
2002-011-1493	12/18/02	12/18/02	Michael Giese
2002-011-1494	12/18/02	12/18/02	Bruan Armbruster
2002-011-1495	12/18/02	12/18/02	Patsy Zarilla
2002-011-1496	12/18/02	12/18/02	Chris Parker
2002-011-1497	12/19/02	12/19/02	Kris Kedzierski
2002-011-1498	12/19/02	12/19/02	Nathan Labadie
2002-011-1499	12/19/02	12/19/02	Brendan Fitzpatrick
2002-011-1500	12/19/02	12/19/02	Darren Johnson
2002-011-1501	12/19/02	12/19/02	Gail Hunn
2002-011-1502	12/19/02	12/19/02	Alex Ford
2002-011-1503	12/19/02	12/19/02	Lynette Bellini
2002-011-1504	12/19/02	12/19/02	Ivan Greene
2002-011-1505	12/19/02	12/19/02	Greg jalbert
2002-011-1506	12/19/02	12/19/02	Gabriel Gonzalez
2002-011-1507	12/20/02	12/20/02	Celest Eden
2002-011-1508	12/20/02	12/19/02	Brandon Carson
2002-011-1509	12/20/02	12/19/02	David Cole
2002-011-1510	12/20/02	12/20/02	FSS

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1511	12/06/02	12/06/02	Benjamin Y. Cooper
2002-011-1512	12/13/02	12/13/02	Thomas M. Sullivan Major I. Clark , 111
2002-011-1513	12/20/02	12/20/02	E. M. Camden
2002-011-1514	12/20/02	12/20/02	Curt Meinhold
2002-011-1515	12/20/02	12/20/02	Orin Blomberg
2002-011-1516	12/20/02	12/20/02	Michael Schumann
2002-011-1517	12/02/02	12/20/02	Brian Gallagher
2002-011-1518	12/20/02	12/20/02	Gerald Hilts
2002-011-1519	12/20/02	12/20/02	Eugene Piersol
2002-011-1520	12/20/02	12/20/02	Joel Rothermel
2002-011-1521	12/20/02	12/20/02	Jeff Knisely
2002-011-1522	12/20/02	12/20/02	Isaac Venn
2002-011-1523	12/20/02	12/20/02	Warren Volz
2002-011-1524	12/20/02	12/20/02	Brandon A.
2002-011-1525	12/20/02	12/20/02	Ann Malain
2002-011-1526	12/20/02	12/20/02	Michael Duh
2002-011-1527	12/20/02	12/20/02	Gerald Shane
2002-011-1528	12/20/02	12/20/02	Derrell Piper
2002-011-1529	12/20/02	12/20/02	Edward Schwarz
2002-011-1530	12/20/02	12/20/02	Darryl Levingston
2002-011-1531	12/20/02	12/20/02	Davis Kuykendall

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2002-011-1532	12/21/02	12/21/02	James Littlebrant
2002-011-1533	12/21/02	12/21/02	Eric Wolff
2002-011-1534	12/27/02	12/27/02	Richard Hutchinson
2002-011-1535	12/21/02	12/21/02	Justin Tack
2002-011-1536	12/21/02	12/21/02	Gerald Dalton
2002-011-1537	12/21/02	12/21/02	David Pritchett
2002-011-1538	12/21/02	12/21/02	Joshua Peper
2002-011-1539	12/21/02	12/21/02	Douglas Thrift
2002-011-1540	12/21/02	12/21/02	Charles R. Norris
2002-011-1541	12/21/02	12/21/02	Paul Pratzner
2002-011-1542	12/21/02	12/21/02	Michael Thompson
2002-011-1543	12/21/02	12/21/02	Scott Smith
2002-011-1544	12/21/02	12/21/02	James Hager
2002-011-1545	12/21/02	12/21/02	Edward Brouillet
2002-011-1546	12/21/02	12/21/02	Nolen Scaife
2002-011-1547	12/21/02	12/21/02	Michael Brewer
2002-011-1548	12/21/02	12/22/02	Daniel Whaley
2002-011-1549	12/22/02	12/22/02	John Hickey
2002-011-1550	12/22/02	12/22/02	Steven Short
2002-011-1551	12/22/02	12/22/02	Harley Fisher
2002-011-1552	12/22/02	12/22/02	Thomas Vincent

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2002-011-1553	12/22/02	12/22/02	Tammany Russell
2002-011-1554	12/23/02	12/23/02	Steven Nick
2002-011-1555	12/22/02	12/22/02	Brian Feller
2002-011-1556	12/23/02	12/23/02	Jean Gongaware
2002-011-1557	12/26/02	12/02/02	Epimethian Press & Distribution
2002-011-1558	12/26/02	12/02/02	Skokie Public Library
2002-011-1559	12/12/02	12/12/02	Department of State

Attachments



"Kelly, Judy"
<jkelly@ncf.edu>

11/06/2002 01:15 PM

To: farcase.2002-011@gsa.gov
CC:
Subject: FAR case 2002-011

2002-011-1

As a private citizen, I am delighted for the government to quit wasting money by forcing all agencies to use GPO for all of their printing needs.

As a documents librarian, I am glad there are also provisions to insure depositories still receive departmental publications.

Judy Kelly
Head of Technical Services
New College of Florida

2002011-2



"Becky Byrum"
<Becky.Byrum@valpo.
edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: Far case 2002-001

11/14/2002 02:46 PM
Please respond to
Becky.Byrum

With regard to the following point:

"Improving the depository library system by taking concrete steps to ensure that all Government publications are in fact provided to the GPO's Superintendent of Documents for distribution to the Federal Depository Library Program (FDLP)."

My question is this: since the reason that FDLP libraries do not get all the documents published by agencies is that the agencies publish documents WITHOUT TELLING OR PROVIDING THE DOCUMENTS TO GPO, then how will taking the mandatory publishing away from GPO "ensure that all Government publications are in fact provided to the GPO's Superintendent of Documents for distribution to the Federal Depository Library Program"?

A more likely senario is that the FDLP libraries will get far fewer documents than ever before because the agencies have no mechanism for knowing how many of each title to produce (FDLP libraries choose what we want to receive) to provide to GPO for distribution and they will just conveniently forget to provide for FDLP libraries - which is what they often do now. Sort of like the OMB has conveniently forgotten that ONLY THE SUPREME COURT can declare a law (in this case Title 44) unconstitutional.

With regard to saving taxpayers money by allowing the agencies to get bids for printing:

Since GPO outsources much of its printing and has tremendous buying power due to the sheer volume of printing jobs, how can individual agencies, without the buying power, save that much money? Also, if GPO has to bid for each job, their prices will necessarily have to increase just to cover the cost of the bidding process. And, GPO currently uses many small printers. Without the GPO, how will they be able to compete for printing jobs with large printing companies?

Thank you.

Becky Byrum

Becky Byrum
Email: Becky.Byrum@valpo.edu
Government Information Librarian
Moellering Library
Valparaiso University
Valparaiso, IN 46383
(219) 464-5771

A life lived in fear is a life half lived.

2002-011-3



"Eric Johnson"
<ejohnson@selu.edu>
11/14/2002 11:51 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: GPO competition

To whom it may concern:

I'd like to go on record as opposing the plan to use alternative printing sources in lieu of the Government Printing Office. First, since the GPO is already in place, why not address concerns and make necessary reforms to this operation instead of using other printing services to somehow force the GPO to reform itself? Secondly, I have major concerns, despite the promise of improvements that would result in the federal depository system, that agencies using outside services would somehow bypass or forget the system, and documents that would normally be distributed to depository libraries might fall through the cracks.

Thank you.

Eric Johnson

Eric W. Johnson
Interim Library Director
Sims Memorial Library
Southeastern Louisiana University
SLU 10896
Hammond, LA 70402
(985) 549-3860

2002-011-4



"Susan Lyons"
<govdocs@andromeda.rutgers.edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: Comment on proposed FAR reg - 11/13/02 Fed. Reg

11/14/2002 11:39 AM

The proposed amendment to the Federal Acquisition Regulation (FAR) does not accomplish the goals stated in the summary. Bypassing the Government Printing Office will cost taxpayers additional money, decrease distribution of government information to small businesses and consumers and gravely affect the operation of the Federal Depository Library Program. I urge that this proposal not be adopted.

The Government Printing Office (GPO) achieves economies of scale that will be lost if executive agencies handle printing through a decentralized system. The GPO already contracts out many printing jobs through competitive bidding to private contractors throughout the nation. The GPO, through its many years of experience with the printing industry, achieves the highest quality for the lowest cost. It will take much time and additional staffing for executive agencies to replicate the expertise of the GPO.

An essential role played by the GPO is the cataloguing of all government publications it distributes, electronically or in print. Fugitive documents result when agencies fail to distribute documents through the GPO. The proposed amendment will make this situation much worse. Information that is not catalogued will not be found by those citizens for whom it was created. It would be prohibitively expensive for executive agencies to duplicate the staff of talented librarians and database experts at GPO that now track and catalog government publications. It would also be a waste of taxpayers money.

Finally the GPO has established a cost effective method of distributing government documents to the 1300 depository libraries, and the citizens and businesses that they serve. To duplicate this distribution network would again be an unnecessary burden to the taxpayers. The Federal Depository Library Program is one of the best bargains in government today. The depository libraries bear the greatest expense of the program by providing professional librarians to organize the material and assist citizens in locating the documents. They also house the documents in appropriate shelving or cabinets at considerable expense. The government pays only for the printing and distribution. The taxpayers win on both ends of the equation. They gain access to government information at minimal cost.

The Government Printing Office has provided efficient and cost effective service to this Nation for over 140 years. This proposed amendment jeopardizes the efficiency and cost effectiveness of government printing.

Susan Lyons
Chair
Government Documents Special Interest Section
American Association of Law Libraries

Documents/Reference Librarian
Rutgers Law Library

2002-011-5



"Ruth McNaught"
<rmcnaugh@mc3.edu>
11/14/2002 10:02 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR case 2002-011

To whom it may concern:

I strongly object to OMB proposing to remove restrictions in Far 8.8 that "mandate exclusive use of GPO for printing and related supplies." As a depository librarian for 16 years, I have witnessed the efforts and frustrations of GPO to get agencies to include their documents in the Federal Library Depository Program. Agencies apply for waivers, and thus many of their documents never enter the program and the public is denied access to the information in these documents.

The proposal claims that the new rules will improve the depository system. I fail to see how this will make any improvements. If one printing source cannot keep a rein on all the agencies now, what will happen when many sources of printing are in play? The result, I fear, will be the complete bypassing of the depository system. Private printers have no vested interest in providing documents to the people. Many agency heads do not have any interest either. Only GPO has the public's interest as their goal. The public will have less access to information.

I am also quite concerned about the statement that "concrete steps" will be taken "to ensure that all government publications are in fact provided to the GPO's Superintendent of Documents for distribution." What are these "concrete steps"? Since they are not spelled out, I think that when it comes to implementation of this proposal all specific steps will not be spelled out. Thus the agencies and private printers will have free reign to ignore GPO and the depository system.

Thank you for allowing me to comment.
Ruth McNaught

Ruth McNaught
Government Documents Librarian
rmcnaugh@mc3.edu
Montgomery County Community College
340 DeKalb Pike
Blue Bell. PA. 19422
215-641-6595

2002-011-6



freamodi@shu.edu
11/14/2002 09:23 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: GPO

To: Whom it may concern,

As a Government Documents Assistant, It is expedient for me to receive the documents from a central location. Receiving information from a variety of sources would greatly impair my ability to track documents and enter them into our system. I hope you would reconsider absolving the GPO from printing all government documents.

Sincerely,

Dierdre M. Freamon

Dierdre M. Freamon
Government Documents Assistant
Seton Hall University Law Library
(973) 642-8754
freamodi@shu.edu

2002-011-7



"Diane VanderPol"
<Dvpo@calvin.edu>
11/13/2002 09:17 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: Comments on non-GPO printing

I am a government documents librarian in a selective depository library for federal documents. Our library selects about 33% of what is available. Here are my comments on the Information Distribution section of the proposed rule as published in the November 13, 2002, issue of the Federal Register.

1. I think the 50% estimate for fugitive documents in the current system is high. But the fact that there are fugitive documents at all when printing is supposedly centralized would, to me, indicate absolute chaos if printing is decentralized. Who is going to enforce the requirement that agencies provide copies for the depository library program? I'm afraid this requirement will be ignored, and the number of fugitive documents will increase, if they are ever even discovered.

2. How is it saving the taxpayers money if the Superintendent of Documents receives only ONE copy of a document and then must reprint it, or worse yet, actually purchase copies for libraries? The current system of adding the number of copies to be distributed to libraries into the initial printing run is much more cost effective. And this number is not constant since each depository library selects the categories of documents they will receive, and that number varies from library to library.

Even though the FDLP currently distributes about 60% of its documents online, there still must be a call for printed documents or these other agencies would not be taking their printing orders elsewhere. The GPO and libraries bring some order and organization to the abundance of information that is available today, and it would be a terrible loss to the citizens of this country if this system is diminished.

Diane Vander Pol
Documents Librarian - 0281B
The Hekman Library
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3207 Burton SE
Grand Rapids, MI 49546
Phone: 616-957-7072
Fax: 616-957-6470
E-mail: dvpo@calvin.edu

2002-0118



"Sharon Partridge"
<sharonp@jefferson.lib.co.us>

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: FAR case 2002-011

11/13/2002 08:52 PM

The OMB does not have the power to supercede a law passed by Congress. According to 44 USC 501

"All printing, binding, and blank-book work for Congress, the Executive Office, the Judiciary, other than the Supreme Court of the United States, and every executive department, independent office and establishment of the Government, shall be done at the Government Printing Office, except-- (1) classes of work the Joint Committee on Printing considers to be urgent or necessary to have done elsewhere; and (2) printing in field printing plants operated by an executive department, independent office or establishment, and the procurement of printing by an executive department, independent office or establishment from allotments for contract field printing, if approved by the Joint Committee on Printing."

Clearly, changing FAR to agree with the OMB is against the law. Because I am one of the links between government information and the taxpayer, I am also concerned that such outside printing never gets sent to the depository libraries where the citizens can use it.

Sharon M. Partridge
Documents Librarian
Jefferson County Public Library
Lakewood Library

sharonp@jefferson.lib.co.us
10200 W. 20th Ave.
Lakewood, CO 80215
(303) 232-9507

Find us on the Web: <http://jefferson.lib.co.us>

2002-011-9



"Nicole Merriman"
<nicole_merriman@hotmail.com>

To: farcase.2002-011@gsa.gov
cc:
Subject: Comments for FAR case 2002-011

11/13/2002 01:52 PM

To: General Services Administration,
FAR Secretariat (MVA), 1800 F Street, NW., Room 4035,
ATTN: Laurie Duarte, Washington, DC 20405

From: Nicole Merriman
3379 Paxton Court
Hilliard, OH 43026

I would like to comment on Section 3 - "Information Distribution", specifically the following statement - "Each publication would be transmitted using electronic means unless such means are unavailable." I work in a depository library in Ohio. I would like to see the following language added to this statement: "Each publisher will guarantee that each publication transmitted in electronic format will be accessible for at least 200 years." If this can't be guaranteed (and at this point, it probably can't), then the publishers should be required to submit the publications in paper format until electronic formats ARE guaranteed to be around for at least a couple of hundred years.

I'm glad to see that section 3 discusses fugitive documents. I hope that there will be genuine follow-through on the "mandatory steps" that will be required of Executive Branch documents in distributing fugitive documents to the depository libraries.

Nicole Merriman

Help STOP SPAM with the new MSN 8 and get 2 months FREE*
<http://join.msn.com/?page=features/junkmail>

2002-011-10



"Vicki Tate"
<vtate@jaguar1.usouth
al.edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR case 2002-011

11/13/2002 01:50 PM
Please respond to "Vicki
Tate"

General Services Administration,
FAR Secretariat (MVA)

I opposed the proposed changes in the FAR based on policy set forth in the OMB Memorandum no. M-02-07.

The contention that this will save taxpayer money by inducing competition is erroneous. What it will do is provide the Executive Branch with a method to circumvent their Title 44 Chapter 19 obligations to inform the American public through the Federal Depository Library Program. By publishing information outside of the procurement done through the Government Printing Office, it basically withdraws publications from distribution. This will have an enormous impact on the Federal Depository Library Program and the public's access to tangible government publications.

Despite the requirements for agency dissemination in Title 44, it has been estimated that fifty percent of the government publications that Executive Branch agencies print today are "fugitive." This means that the printing or procurement is done outside of GPO or that agencies produce the publication on in-house printers. Most importantly, it also means that these publications are not known by GPO, are not cataloged by GPO and are not included in the FDLP, with the result that your constituents may be denied access to this information. Future generations also are denied the opportunity to benefit from, or even be aware of, this information that the Federal Government created at taxpayers' expense and that, by law, should be readily accessible to the public.

The fact of the matter is that when agencies use GPO, as required by law, to procure or print their publications, the public then has access to that information through the FDLP. When agencies do not use GPO, the public suffers because that information usually is lost and inaccessible. A 1998 review of the National Institutes of Health - an agency that has statutory authority to procure and print its publications - determined that only 22 percent of the NIH titles within the scope of the FDLP were actually provided to GPO for inclusion in the FDLP. This means that only about one out of every five publications issued by the NIH has been cataloged by GPO and provided to the public through depository libraries as mandated by law. The fact is that when agencies procure outside of GPO or print in-house, there is neither an economic incentive nor an enforcement mechanism in place today to ensure that they provide depository copies to the Superintendent of Documents.

GPO provides agencies with an efficient and transparent mechanism to meet their Title 44 obligations and keep the public informed. The origins of the FDLP and its partnership with Congress date back to the Act of 1813, when Congress authorized legislation to provide one copy of the House and Senate Journals and other Congressional documents to certain universities, historical societies and state libraries. For more than 100 years, since the Printing Act of 1895, the link between producing, disseminating and no-fee public access to government publications, including those from Federal agencies, through the FDLP has worked effectively. When agencies comply with the Sec. 501 provisions of Title 44, the GPO procures and manages the printing contract for the agency's publication. GPO then adds to the

2002-011-11



"Locke, Gayle"
<LockeG@tacom.army.mil>

To: "Farcase.2002-011@gsa.gov" <Farcase.2002-011@gsa.gov>
cc:
Subject: Regarding proposed FAR change

11/08/2002 09:06 AM

To all:

As a publication manager for Department of Defense technical publications it has been increasingly frustrating to manage technical publication development and delivery when two current agencies (GPO and USAPA) absolutely refuse to not only provide timely delivery, but to even annotate the dates of data received and delivered. My frustration is compounded by traditional lack of printing funds that start in July or August of every year.

I have researched cost per page and have more than one contractor willing to pick up the options that GPO cannot or will not handle. Additionally, a non-GPO contractor will provide me with the ability to track delivery to the users of technical publications. When field units of US Army soldiers are waiting for up-to-date and accurate information it is unacceptable to ask them to wait six months or more for an "Expedient" delivery from a GPO printer. Current conditions enable the printer to pick up data in Alexandria, print it in Atlanta, Georgia, pack it and ship it to St. Louis Distribution where it is unpacked and repacked for delivery to various Army field units and major commands. I find the current situation completely unacceptable, detrimental to our nation's defense and costly to taxpayers.

I encourage Director Mitch Daniels, OMB in his quest to bring some sanity to the current publication and delivery process.

Thank you for your consideration in this matter.

Gayle L. Locke

TACOM Bradley Mobility Group

DSN 786-7385

Com 586-574-7385

2002-011-12



Carol_Kira@flmd.uscourts.gov

11/07/2002 12:31 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: Use of GPO as mandatory source

Eliminating the mandatory use of GPO for printing would make our procurement process move more smoothly. We would procure printing under the same rules that are applied to all other purchasing, which makes sense. It definitely would promote competition, allow small local businesses an opportunity to work with the government, and ultimately save the government money. We would continue to solicit GPO as a source for printing also.

Carol Kira
Procurement & Property Specialist
U.S. District Court, Middle District of Florida
Phone: 407-835-4225
Fax: 407-835-4340

2002-011-13

November 8, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street NW, Room 4035
Attn: Laurie Duarte
Washington, DC 20405

Re: FAR case 2002-011

Dear Ms. Duarte:

I have been waiting for this proposed change, as we print and distribute for many Fortune 100 firms and are extremely interested in working directly with Executive Branch agencies. However, I am not certain as to what my comments should contain. I have read everything I could find on the subject from Memorandum M-02-07 to the comments made by Mitch Daniels, Michael DiMario, Benjamin Cooper, Julia Wallace and William Boarman to the Joint Committee on Printing and statements from members of Congress. This is a relatively simple business issue into which many are injecting unrelated subjects or easily resolved concerns. Since I do not know what you will receive relative to the FAR changes, I wanted to include my other thoughts as additional information.

Proposed FAR changes

The proposal accurately states the history of the issue, what is being proposed and why. It also addresses some of the concerns that have been expressed. I question some of it, as follows.

1. The use of a central posting or an "ebay"-type function is not what I envisioned. It seems like you are substituting one central procurement system (GPO) for another (FedBizOpps). It is unclear what happens after that point. My hope was that the agency personnel responsible for producing the work would work directly with known local printers. That would put them in face to face contact, and allow for problems to be quickly resolved. The proposal gives the agencies a year to find sources. Private sector corporations can assist them, as they have established suppliers, and have verified their quality and capabilities.
2. It is unclear what happens after the bids are received. I am assuming that the agency person needing the work receives the bids and makes a selection based on cost and other factors that may be important. Clarification of the entire process would be helpful.
3. If you must use a system such as FedBizOpps, there needs to be a filtering system. Printing capability is a function of equipment and capacity. I would not want to search through a large volume of opportunities to find those that we do best. I would like to be able create a filter within FedBizOpps that would allow us to search the opportunities for specific types of work and estimated dollar value or page volume. Ideally, it would send the results to me each day by email. If you let the agency personnel handle the bidding themselves, this is avoided.

2002-011-13

They would know who does what and contact the appropriate printers. This is what our automotive customers do. The Purchasing Departments usually require them to obtain three estimates, and they go to suppliers that are known to have the proper capability.

4. I don't have an issue with agencies using existing in-house equipment. If they can do the work internally at a favorable cost, let them do so. If they need more capacity or additional production or fulfillment steps, we can provide that. The \$2,500 limit may require raising, as that volume is ideal for in-house facilities.
5. With regard to the Federal Depository Library system, I see no problems with including a clause. This is really very simple. All we need to know is what to ship, where and to whom. I see the reasoning for having the GPO purchase its own copies, but I like simplicity. I would prefer to produce and ship everything and invoice the agency for the full amount. They could then bill the GPO. We could provide the agency with proof of delivery to the GPO as part of our invoice. That would eliminate the need for the agency to do anything, but bill the GPO.

Other Information regarding Memorandum M-02-07

The Basic Facts

The debate over M-02-07 represents the expenditure of a great deal of time and energy for no constructive purpose. All the Memorandum and its anticipated FAR addendum do is allow an Executive Branch agency to procure printing from the source that can best meet its needs – a simple business decision. If the GPO is the best source, it will be selected. If it is not, it will learn why and be in a better position the next time. The Memorandum only seeks an alternative based on good business judgement, and that should cause no alarm. What is very disturbing is the concept that laws or policies should preclude a better alternative or protect a government entity when one is found. That is self-preservation, not good government.

The 1996 Justice Department finding that existing law, when applied to the Executive Branch, is unconstitutional is very clear. Therefore, the focus should be on repealing or changing the law, not on referring to it, as if the Justice Department did not exist.

The other issues raised are either unaffected by the Memorandum or already exist under current practices. If they need to be addressed, doing so will be required with or without M-02-07.

The GPO needs a clear business plan focused on what it does best now, not what it did in the past. The need for centralized printing was clear in 1860 and through much of the 20th century. But technology changed, as did the need for information. The GPO has addressed this with its Internet site, and should continue to improve its functionality (needed) and content. This is where it can provide great value today – rapid access to information, not its procurement.

Agency Procurement of Printing

Some appear to see abolishing in-house agency printing as a solution to a GPO problem. It isn't, and is another subject entirely. The facilities exist, and can certainly be used directly and through the proposed "cross-servicing" agreements, if that provides the lowest total cost. Sometimes printing really is as simple as going to a local copy center or an agency's own facilities. Budco produces printed material for many Fortune 100 firms. If an agency has work that can be quickly and cost effectively done in-house, they should do so. If they need higher capacity, extensive assembly, low cost shipping, etc., we can do a better job.

Bulk Purchasing Power

If the GPO buys blank paper and envelopes and prints them with any required letterhead and return addresses, this has potential benefit. If the supplier does the printing, it is not really a bulk

purchase of stock, but of finished goods. When buying paper and envelopes you reach the point of diminishing returns rather quickly. Many agencies would be at the same cost level without the GPO's involvement, and the storage costs of large inventories would be avoided.

Loss of Knowledge of What is Printed

I agree there is a need to provide the public with information. I also know that "fugitive documents" has been a topic of discussion for many years. I don't believe this has any bearing on the Memorandum, as the issue remains with or without it. This is a matter of requiring agencies in all branches of the government to add the GPO and/or the Federal Depository Library system to their distribution lists. The GPO does not need to produce the material, only receive it.

However, there needs to be better control over what is disseminated. I found technical manuals for weapon systems listed on the GPO site and in most major Federal Deposit Libraries. This seems questionable. Equally odd is the inclusion of shipping documents for a publication.

Myth of a GPO Monopoly

This is a larger issue than stated. My understanding is that the GPO currently blocks an agency's ability to go outside it even if the GPO cannot meet the agency's needs. Previously, an agency could use an exception, but could not pay for the work with appropriated funds. So, the "monopoly" pertains to both the ability to go outside the GPO and to use the funding. This makes absolutely no sense, as it is the agencies, not the GPO, that have the printing requirements. Agencies need the authority to create and manage their own printing budgets, select their suppliers and process invoices. This places responsibility and authority with the entity initiating the printing process and most familiar with the end product.

GPO's Procurement Program: "Government at Its Best"

I reviewed the Booz-Allen & Hamilton report mentioned. It is about 400 pages, and generally not complimentary. It is a "wake-up call" with many specific recommendations regarding the elimination of the Regional Printing Offices, major personnel reductions, a complete top-down reorganization, creation of effective short and long term business plans, etc. The report was delivered in 1998, and virtually nothing has changed. Like the phrases quoted, only the report's acceptable items were used – certainly not the 80% mentioned. Therefore, \$1.5 million was spent for a very comprehensive review by a well-respected firm, and largely ignored. I strongly suggest that everyone involved read the full report.

The claim of a 98.2% on-time delivery rate is impossible. Funding is often exhausted months before the fiscal year ends. That fact alone negates any hope of achieving good order fill rates unless the calculation is made from the time the orders are released, rather than received, or the orders are not accepted until funding is available. Whatever the methodology, the important fact is that the needs of many agencies are suspended for months, while the use of viable alternatives is effectively blocked.

As for the GPO's fees, prompt payment discounts and economies, some basics need to be kept in mind.

1. The GPO acts in response to an agency employee who can often perform the same functions and avoid the fees. If the employee needs assistance from the GPO, the agency should pay for the services, and Memorandum M-026-07 provides that option.

2. If the Memorandum is implemented, there will be no increase in agency personnel. The existing people, who initiate the printing orders and send them to the GPO, will work with either their chosen printers or the GPO. There is no change in their work, only the option of using a source other than the GPO.
3. The GPO retains prompt payment discounts, because it is the billing point. The agencies could easily do that and receive the discounts.
4. The savings cited by the GPO are selective, and can be offset by high costs on other projects. I have been involved with projects that did not go through the GPO when policy allowed that, and could do the work faster and for less.
5. The GPO statement that "approximately 85% of all procurement orders in FY2001 were valued at \$2,500 or less" is very important as it indicates there is a great deal of GPO manpower devoted to many small projects – the ideal ones for agency in-house production. Limiting the GPO to large volume jobs is not the answer either. Those are often the ones most easily handled by agency personnel with a local source, as the need is volume, quality and time, not complexity.

Cost Impacts from OMB's Memorandum

The skills agency personnel would need to acquire are basic. My first job involved purchasing printing. I knew nothing, but quickly and easily learned. Agency personnel know what they are printing. The GPO needs to provide them with a list of what firms did the work and itemized prices. With that as a starting point, they can obtain guidance from large corporations as to what firms they use for various types of work, why and market pricing. These firms have already done the quality verifications and competitive bidding.

If the major recommendations made by Booz, Allen & Hamilton had been implemented, the economic impact the GPO notes would be history. Cost increases that are offset by decreases are workable, and I don't see any indication that a total cost/benefit approach is being used. In addition, one-time costs do not repeat, but savings do. GPO's estimate of reduction in force costs is one part of the analysis. The other is future savings. OMB's estimated annual Executive Branch savings seem to approximate the GPO's fees, but there are more.

Other

I agree with the need for a printing budget, and find it hard to believe that such a basic function has not been part of the GPO's operation. I suspect they have elements of it, but are hindered by their procurement position as a middleman. The Memorandum states that the agencies are to have printing budgets and be accountable for performance to them. That solves the problem.

The concern over the government's internal printing capacity is a valid discussion point, but not properly focused. These facilities already exist. If some cannot be justified on the basis of cost, security, etc., there is an issue. However, simply eliminating them without a thorough cost/benefit analysis makes no business sense, and is completely unrelated to the Memorandum's objectives.

Comments regarding the GPO's current facility and the need for a new and smaller one may be valid, but are another topic. Those are economic and real estate issues, not printing and procurement matters.

I do not understand the concern about the management of printing and information by the Executive Branch and shifting procurement to it. The Memorandum simply allows Executive Branch agencies to use other sources for printing based on total cost and service. It does not apply to the Legislative or Judicial Branches, and the dissemination of that (or all) information can

2002-011-13

still be done by the GPO. As previously noted, the GPO simply needs to receive the publications, not procure them.

I agree that the GPO's process does not foster "best value". The bids tend to reflect the way things have been done, rather than the way they should be done. The Memorandum will allow current "best practices" to surface. We are ISO 9001 certified and a primary supplier to many Fortune 100 firms. We only retain that status and business by offering best value solutions.

I disagree that the three primary GPO functions - printing and publication for Congress, procurement and dissemination of information are interrelated and not mutually exclusive. Each can easily stand on its own, and the Memorandum only pertains to procurement and does not exclude the GPO, if it provides the lowest total cost.

In closing, I enjoy a comprehensive debate in which all the issues are raised and thoroughly discussed. I believe the JCP's inquiries would yield more complete information, if they included the authors of the Booz-Allen & Hamilton study and people more removed from the GPO and its activities. I would be happy to participate.

Sincerely,

Michael A. Guy
Business Development Manager
313-957-5693
Michael_Guy@budco.com

2002-011-14



"Treff-Gangler, Louise"
<Louise.Treff@cudenver.edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

11/18/2002 12:18 PM

RE: FAR Case 2002-011, Proposed Federal Acquisition Regulation on Procurement of Printing and Duplicating Through the Government Printing Office

If printing of U.S. Government publications is procured outside of the U.S. Government

Printing Office, it is essential that the clause in the proposed rule concerning "Information Distribution" be carried out to submit one copy in electronic or other format of each publication

to the Superintendent of Documents, U.S. Government Printing Office, for distribution to

depository libraries throughout the United States. Distribution of all government publications

to depository libraries is essential for the public's right to government information and to its

retention for permanent public access.

Louise Treff-Gangler

Head, Government Publications

Auraria Library

Serving the Community College of Denver, Metropolitan State College of Denver, and the University of Colorado at Denver

1100 Lawrence St.

Denver, CO 80204-2095

303-556-3532

Louise.Treff@cudenver.edu

2002-011-15

Paul A. Arrigo
Head Librarian
Lartz Memorial Library
Penn State Shenango
177 Vine Ave.
Sharon, PA 16146

Dear FAR Secretariat,

As a citizen of the United States, a Republican and a former depository librarian, I would like to say that this F.A.R. amendment, (FAR case 2002-011) is flawed in many ways. The primary problem is that this regulation, if promulgated, will violate U.S.C. Title 44. The least OMB should do is wait for a Supreme Court interpretation of this title before going out and making your own laws. It is important to remember, lest the current administration has lost its grip on political reality, that America is a Republic and the citizens elect their representatives to pass laws and make legislation not Presidentially appointed agency heads. Weren't Republicans dismayed by President Clinton's attempts to work around the law with rules and regulations, yet the Bush Administration is attempting to do the same thing.

Decentralization of Printing

I really like the Federal Enterprise Architecture Program Management Office's (FEAPMO) Business Reference Model that OMB is working on to reduce duplication of effort across agencies and improve Agency management in the area of Information Technology. However, this F.A.R. regulation flies in the face of the FEAPMO goals. Rather than centralizing the printing process with GPO, OMB is advising agencies to establish their own printing contracts. This will significantly increase duplication of effort, costing each agency time and money to hire and train in-house printing contract negotiators. The economies of scale would also be significantly reduced if each agency procured their own printing contracts. The decentralization of printing would allow printers to charge more for each Agency because the competitive bid process would not be as large as GPO's.

GPO already provides a great service for printers and the Agencies. GPO provides a place of one stop shopping for their printing needs. Many agencies do not know the technical requirements when procuring a printing contract. Many agencies will need to learn more about the technical requirement of printing their publications. It seems like a great waste of time and resources to me.

Addressing the Problem of Fugitive Documents

In your proposed regulation you try to tackle the problem of fugitive documents, which is commendable, but the process you recommend will not work any better than it does now. Currently there is no strong incentive or sanction to entice/coerce agencies to submit their documents to the Superintendent of Documents. Nowhere in the regulation do I see a strong

2002-011-15

incentive for Federal Agencies to submit their documents nor any sanctions should they fail to do so. This would not solve the fugitive documents problem any more than the current law does.

Secondly, decentralizing the printing of government documents will exacerbate the problem of fugitive documents especially when GPO is required to purchase copies of Government publications from Agencies who contract directly with private sector printers. This is contrary to current law. This regulation also reverses who will pay for issues to be sent to the Federal Depository Libraries. Currently that cost is born by the Agencies. Your regulation will turn that around and make GPO bare the cost of printing for the Depository Libraries. OMB is just passing on the cost of information distribution from the Agency to GPO.

In conclusion, the best your agency could do would be to drop this entire regulation and follow the guidance of Title 44 until you hear differently in the form of a Supreme Court opinion.

Sincerely,

Paul A. Arrigo

202-011-16



"Chuck Malone"
<C-Malone@wiu.edu>
11/18/2002 09:55 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: GPO printing/FAR

Dear Madame or Sir,

I disagree that your proposal would save money. Do you think the private printers are going to do all of the setup and other services for free? In the end, I fear that by the time private printers charge for setup AND printing, we will end up with some "\$1000 hammers" out of this deal. Or equally bad, we will end up with shoddy products and poorer dissemination of information. To improve the dissemination of government information, Title 44 provisions should be strengthened to require the agencies to submit more of their documents (both print and online) to the GPO, not fewer.

Charles E. Malone, Unit Coordinator
Government and Legal Information Unit
University Libraries
Western Illinois University
1 University Circle
Macomb, IL 61455
(309) 298-2719
c-malone@wiu.edu

2002-011-17



Mark_Newcastle@fws.gov

11/19/2002 09:33 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: need clarification

FAR Secretariat

It would be greatly appreciated if you would provide clarification for the following:

In review of the draft proposal I could not find any information on how Congress would pay for their own printing. Will they appropriate themselves, the GPO, or take a percentage off the top of each Executive Branch Department budget?

Will there be a GSA surcharge/administrative processing fee, if so, what is it?

How long will Agencies have for the transition?

Will Exec. Branch offices be able to continue to use GPO for printing procurement? It does not appear so.

Will there be an established printing management plan government wide?

How will quality levels be determined?

Will the Agencies have any support when there are contract conflicts?

Are the BPAs any different than current GPO term contracts (Multiple and single award)?

Thanks,

Mark Newcastle
Printing Management Officer
U.S. Fish and Wildlife Service
202/208-4111

2002-011-18



"Jack Ferrell"
<Jack.Ferrell@NAU.ED
U>

To: farcase.2002-011@gsa.gov
cc:
Subject: Comments on proposed rule

11/20/2002 07:47 PM

November 20, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW, Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

Dear Ms. Duarte:

Thank you for the opportunity to submit the following comments on FAR Case 2002-011.

The proposed rule requiring competitive private sector bidding for Government Printing Office printing projects may have unforeseen and negative consequences in the areas of government accountability, public access to information, cost-effectiveness, and quality control.

The reason that Congress created the GPO in the first place was to place government publications under a measure of public accountability, oversight and control. The proposed change could undermine that accountability, and begin to blur the distinction between public documents created in the public interest and private documents published for private gain.

While reducing costs may be a laudable goal, the proposed rule may result in a plethora of competing bids, publishers, and documents, some perhaps indistinguishable from actual government documents, and other "counterfeit" documents which could result from cancellation of modification of contracts, or from failed or legally untenable bids. These consequences, while perhaps unintended, could have the effect of driving up costs and reducing quality, even if attempts to correct such problems are undertaken.

Finally, although ensuring that government publications are in fact delivered to federal depository libraries is likewise a desirable outcome, this outcome should not be linked to a proposal which could undermine that result by requiring each depository to receive documents from a variety of private companies, distributors, and publishers, each of which might seek to impose its own standards, thereby increasing the cost and burden on depositories, ultimately reducing their numbers and reducing public access to information.

In consideration of the above, I would respectfully request that the proposed change be reconsidered and if kept in force substantially modified so as to reduce the risk of the identified unintended effects.

Respectfully submitted,

Jack R. Ferrell, Ph.D.
Associate Professor of Sociology
University Library Committee Member
Northern Arizona University in Yuma
P.O. Box 6236

Yuma, AZ 85366

2002-011-19



"Lori Smith"
<lsmith@selu.edu>
11/20/2002 10:13 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR case 2002-011

Dear Sir or Madam,

Based on my 15 years of experience as a librarian in a Federal Depository Library, it is my opinion that the proposed changes to FAR would have a significant, long-term negative impact on public access to government information.

As the Congress and President both believe will be true with the newly formed Department of Homeland Security, centralized control of a government function provides increased efficiency and improved oversight. The Government Printing Office currently provides this sort of control for government printing. Eliminating that control by allowing agencies to procure their own printing will, in my opinion, result in the following:

- * agency printing costs will increase;
- * fewer small printing companies will receive government contracts;
- * agency publications will cease to include standard bibliographic elements, such as the publication date, that GPO has trained them to include;
- * fewer agency publications will come to the attention of GPO to be included in their cataloging and indexing program, hence the existence of these publications will not be known by future researchers;
- * the distribution of agency publications to Depository Libraries will decrease dramatically, thereby decreasing long-term public access to those publications.

Though the proposal claims the changes will help to resolve the problem of "fugitive documents" that fail to make it to Depository Libraries, I am highly doubtful. The proposed procurement process is similar to the process currently used for state publications here in Louisiana. I can say from personal experience that a system using centralized printing has a much lower percentage of "fugitive" documents than a decentralized system.

OMB is obviously concerned about government agencies competing with the private sector in the performance of commercial activities, however GPO is already subject to such competition. A large percentage of the printing GPO oversees is contracted out to private printers. Just as the agencies in question would have to analyze whether it would be sufficient to photocopy a publication in-house rather than contract for printing, GPO currently analyzes printing jobs and contracts out those that can best be performed by private printers. GPO's expertise in negotiating these contracts and the economies of scale they can create will be lost if agencies begin negotiating directly with private printers.

I sincerely hope the proposed changes to FAR will not be approved.

Lori Smith
Government Documents Librarian
44081 Brandon Dr.
Hammond, LA 70403

2002-011-20



"Sleeman, Bill"
<bsleeman@law.umaryland.edu>

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: farcase.2002-011@gsa.gov

11/21/2002 11:04 AM

I am writing to express my opposition to the proposed rule change 48 CFR Parts 6, 8, and 52 Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office; Proposed Rule which appeared in the Nov. 13 Federal Register.

The original OMB Memorandum M-02-07 which has prompted this proposed change and the FAR change are both couched in terms of reasonableness and "cost savings" to taxpayers although the reality is vastly different. By outsourcing printing to the private sector the overall production costs for printing will dramatically increase. In fact, at hearings regarding the OMB memo Mitch Daniels was unable to demonstrate how the rule change would lead to tax savings. In the May 6th issue of the Government Executive magazine Ben Cooper, a representative of the Printing Industries of America, pointed out that his industry group opposed the change and supported the existing arrangement because "GPO charges fees that most printers would agree are rock-bottom" and because GPO assures in their contract process that printers throughout the country have an opportunity to procure government printing jobs. Additionally, Executive agencies will, in bypassing GPO, have to re-create the structure and staffing which GPO already has in place to coordinate printing and perform the necessary administrative functions needed to follow a printing contract through to a successful completion.

Another major concern with the proposed change is the effect that the Memo will have on citizen's access to government produced information. Currently, when GPO produces an item for any Federal agency it also arranges for copies to be distributed to over 1,300 Federal Depository Libraries (which includes the Thurgood Marshall Law Library). The FAR proposes to mandate that one copy of any document be provided to GPO for distribution through the depository system. If a hard copy is to be provided to every participating library than this one supplied copy must now be re-produced in print form, which would necessitate that GPO spend additional tax dollars to create enough copies to distribute. Additionally one has to wonder if GPO would even get the single, mandated copy. It seems wholly unrealistic to suggest when nearly 50% of all documents are not currently included in the depository program (as OMB admits in the proposed rule change) and government information production is centralized at GPO, that distribution to libraries and users will be improved by decentralizing printing production.

In the original memorandum issued by OMB (and which the proposed rule change seeks to enact) referred to the Internet as another reason why GPO does not need to be involved in Executive Branch printing. While it is true that the Internet has changed the information gathering process it remains an incomplete and unreliable resource. One need only compare the number of Congressional hearings held during any Session with the much smaller number of hearing transcripts actually made available over the Internet to gauge the shortcomings of relying solely on the Internet to provide access to Federal government information.

The issue of outsourcing Executive Branch publishing is not about taxpayer savings - as those savings would largely be non-existent. Nor is it really about the Executive Branch needing to "liberate itself" from an unfair monopoly as claimed in the Federal Register announcement, as most Executive Branch agencies have expressed "universal support" for GPO' service, according to a 1998 study by the consulting firm of Booz Allen and Hamilton. The proposed change is really about the relationship between Congress and the President and the desire to separate Executive Office printing from GPO is really a battle to control information. Like all battles though there will be unforeseen causalities to the fight, in this instance the losers will be the American taxpayer who's government will now have to pay more for its printing and will be denied access to information and resources of the government. I would respectfully urge that this proposed rule change not be implemented.

Bill Sleeman, MLS, MA,

2022-011-20

Bibliographic Control/Government
Documents Librarian
Thurgood Marshall Law Library
The University of Maryland School of Law
501 W. Fayette St.
Baltimore, MD. 21201
410-706-0783 Office
bsleeman@law.umaryland.edu

"Try to remember that workings no crime, just don't let 'em take and waste your time." James Taylor

2002-011-21



"Johnson, Catherine"
<Catherine.Johnson@ost.dot.gov>

11/21/2002 10:18 AM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc: "Pemberton, Richard" <Richard.Pemberton@ost.dot.gov>
Subject: FAR Case 2002-011, Procurement of Printing and Duplicating Through the Government Printing Office

The Department of Transportation, Office of Security and Administrative Management would like to offer the following comments on FAR Case 2002-011 as it was printed in the Federal Register on November 13, 2002.

In view of GAO Report B-300192 of 11-13-02 which states that "agencies are prohibited from using any funds to implement to OMB Memo M-02-07" the proposed rule may be premature.

Executive Order 13101, Greening the Government Through Waste Prevention, Recycling and Federal Acquisition, Section 505 states that the minimum content standard for printing and writing paper shall be no less than 30 percent postconsumer materials. If the FAR is being revised, there needs to be a reminder that when an agency procures printing, the paper needs to meet the above standards.

If you have any questions regarding the above comments, please contact Catherine Johnson at 202-366-0266 or email her at catherine.johnson@ost.dot.gov.

2002-011-22



astrock
<astrock@kent.edu>

11/21/2002 04:03 PM

To: farcase.2002-011@gsa.gov
cc: jsalem@lms.kent.edu
Subject:

FAR Case 2002-011:

The GPO serves as an important tool because it helps to ensure that government agencies are providing the public with various types of Government publications. If there is no centralized source by which these materials are transmitted, there is a greater possibility that this information will not reach the American people because of accountability issues. It seems unlikely that these "specific new actions are proposed to improve dramatically the depository library system by ensuring all Government publications are in fact made available to the nation's depository libraries" because there will be no centralized printing office to hold agencies responsible.

2002-011-23



Arnold.Dana@epamail.
epa.gov
11/22/2002 09:29 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: Comments from the Office of the Federal Environmental Executive

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

Re: FAR Case 2002-011, Procurement
of Printing and Duplicating Through the Government Printing Office

Dear Ms. Duarte:

Thank you for the opportunity to comment on the proposed changes to the Federal Acquisition Regulation (FAR) for the procurement of printing and duplicating services, which proposed rule would implement Office of Management and Budget Memorandum M-02-07. I write today to request that the final rule inform agency acquisition staff that the change in policy regarding printing sources has not changed the buy-recycled paper requirement.

Under section 6002 of the Resource Conservation and Recovery Act, Executive Order 13101, and FAR Section 11.303 and Subpart 23.400, federal agencies are required to purchase paper containing 30 percent postconsumer fiber, including paper used in publications printed by others. These provisions remain in effect, and OMB Memorandum M-02-07 did not change them.

To ensure that procurement staff do not become confused about the impact of OMB Memorandum M-02-07 on the continuing buy-recycled paper requirement, we request that the FAR Council revise proposed Section 8.801(b)(1) as follows (additions are underlined): "[A]gencies shall make awards for Government printing in accordance with applicable parts of the FAR, including Parts 5, 6, 10, 11, 12, 13, 14, 15, 17 and 19 and Subparts 8.4 and 23.400."

Thank you for your consideration of these changes. If you have any questions, please contact Ms. Dana Arnold of my staff at (202)564-9319.

Sincerely,

John L. Howard, Jr.
Federal Environmental Executive

2002-011-24



RCWilliford@aol.com

11/23/2002 08:17 PM

To: farcase.2002-011@gsa.gov

cc:

Subject: FAR Case 2002-011 Opposition

I spent 28 years as a historian in the United States Air Force and have a master of arts degree in library science (1997, University of Missouri). I am a member of the American Libraries Association and am currently employed by the St. Louis County Library District, which operates a Federal Depository Library.

Three points, in response to your proposed rule, 48 CFR Parts 6, 8, and 52, "Federal Aquisition [sic--Acquisition] Regulation; Procurement of Printing and Duplicating Through the Government Printing Office," as published in the Federal Register November 13, 2002 (FAR Case 2002-011).

1 - There is value to be added from centralized control. Although agencies may attempt to manage their own printing procurement, it makes sense to have an agency that deals with the process every day. There will be added expenses to the government as agencies whose primary function is not printing try to make this work. Although there is a cost to any government operation, centralized control of printing is worth the expense.

2 - Your proposed rule states "Moreover, specific new actions are proposed to improve dramatically the depository library system by ensuring that all Government publications are in fact made available to the nation's depository libraries." Besides requiring that agencies provide the Public Printer a copy of each document they have printed, there is nothing in this proposed rule that addresses how depository libraries will be better served. Agencies are already required to provide copies of their publications to the Public Printer, and they do not. The only difference under this proposal is that there no longer will be a central agency in charge of printing, so there will be even fewer chances to identify publications that should be made available to the Federal Depository Library Program (FDLP). Without some sort of penalties for failing to provide publications to the Public Printer, I predict this problem will get worse, not better, if printing is decentralized.

3 - You must clarify your standards for submission of an electronic copy of documents to the Public Printer. A private printer may use proprietary software to produce their finished product. What sort of electronic file will they send to the Public Printer? What medium will it be saved on? More importantly, will it be usable in 10, 20, or 50 years? As much as computers have improved our ability to transmit and share information, many questions remain about the "shelf life" of electronic information. Paper is the lowest common denominator. I own readable books that are 50 and 100 years old. I have computer files on 5-1/4" disks that are less than 10 years old that I can no longer read. Paper is the preferred format of many citizens trying to find government information. Trying to write a historical paper on changes in US agricultural policy, for example, is easier when leafing through several printed volumes of publications than the same task with electronic files. Eliminating print versions will force citizens to print reams of pages, placing additional burdens on them and the depository libraries that try

2002-011-24

to serve them.

Robert C. Williford
11758 Relay Drive
Bridgeton, MO 63044
(314) 344-0040
RCWilliford@aol.com

2002-011-25



"Doug Ernest"
<dernest@manta.colostate.edu>

To: farcase.2002-011@gsa.gov
cc: doug.ernest@colostate.edu, cbush@manta.colostate.edu,
acowgill@manta.colostate.edu
Subject: Federal Acquisition Regulation regarding Government Printing Office

11/25/2002 05:31 PM
Please respond to
dernest

This message is in regard to FAR case 2002-011.

In my capacity as the government publications librarian at Colorado State University I wish to comment on the proposed Federal Acquisition Regulation; Procurement of Printing and Duplicating through the Government Printing Office.

My particular concern is in regard to section 3, "Information Distribution." The premise of this section appears to be that the present distribution system for the Federal Depository Library Program (FDLP) is inefficient, with perhaps as much as 50 percent of federal government publications becoming fugitive and never making their way to the Superintendent of Documents for distribution to the FDLP. As a corrective the proposed rule apparently mandates distribution through electronic mechanisms. However, such a course of action appears merely to shift the burden of printing and binding these publications from the Government Printing Office or the agencies themselves to the depository libraries. Past experience indicates that creation of only an electronic link from a library catalog to a government site runs the risk that the site and/or the publication(s) it represents may someday go away. To retain information on a permanent and archival basis still requires printing in many cases. It would be costly, perhaps prohibitively so, for our library to download and print government publications it now receives through the depository system. Moreover, such printing itself may be impermanent, given the nature of laser printing. My conclusion is that the information distribution guidelines outlined in FAR case 2002-011 are likely therefore to be detrimental to depository libraries.

The opinions expressed in this message are mine and do not represent, explicitly or implicitly, positions, policies or opinions of Colorado State University.

--

Doug Ernest
Reference Librarian
Colorado State University Libraries
501 University Avenue
Fort Collins, CO 80523-1019
970-491-1861 (voice)
970-491-5817 (FAX)
doug.ernest@colostate.edu

2002-011-26



"Lang, Stafford C"
<Lang.Stafford@hq.navy.mil>

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: electronic comments

11/25/2002 09:58 AM

Comments on FARCASE 2002-011.

I have 27 years of printing work experience and a BS degree in Printing Management. Two years of printing work experience in private industry and 25 years printing work experience in government service. I also have five years of government service experience as a budget analyst for the Assistant Secretary of the Navy (FM&C). During my tenure in government service, I started as a printing clerk, advanced to the printing specialist level and finished my printing career as the Director, U.S. Army Printing and Publications Center, Europe (USAPPCE), GM-1654-14, Printing Officer. As Director, (USAPPCE) I was in charge of the largest government printing plant of its kind outside of the Government Printing Office (GPO) and for seven years, I provided printing and publications support for the entire European theatre of operations. During my printing career in the government, I worked directly for the Secretary of the Navy (8 years) and Secretary of the Treasury (3 years).

In my opinion, the GPO has used Title 44 to control printing requirements of government agencies, to justify their importance in the government printing arena, and most importantly, to increase revenue to cover operating expenses and costs. First, controlling printing requirements (i.e. Joint Committee on Printing Regulations) equates to controlling and reducing the cost of printing. This may have been true ten years ago, but with automation and technical advances within the printing industry and improved office reproduction and automation equipment, today, the cost of printing has decreased substantially. What has not decreased is the cost of doing business with and through GPO and other government agencies (i.e. Defense Automation and Production Services). Second, GPO needs to maintain their position as the printing establishment of the government for survival and to justify their existence. GPO's main mission is to provide printing support to Congress. This support may or may not be available from private industry. To enhance their position, GPO needs to be able to say that they also provide all printing support for all government agencies. Third, GPO needs the revenue it receives from other government agencies to continue to be able to operate at a favorable cost level for Congressional printing requirements. With the GPO surcharge, executive agencies are supplementing the cost of Congressional printing requirements. Also, Congress provides an operation budget for GPO. If GPO cannot operate within their budget, they need to go to Congress and ask for and justify additional funds, as is the case of Executive agencies justifying their operating budgets. Also, GPO is charging Executive agencies a surcharge for processing paperwork for duplicating support. The only time GPO should be used is when the printing requirements are for color or four color process printing and any work over the \$2,500.00 threshold. This is my unbiased, non-political opinion. I have nothing to gain and nothing to lose from my statements.

Stafford C. Lang

2002-011-27



"Bert Chapman"
<chapmanb@purdue.edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: Comments on FAR 2002-011

11/25/2002 09:50 AM

November 25, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, N.W., Room 4035
Attn: Laurie Duarte
Washington, DC 20405

Dear Ms. Duarte:

I wish to comment and express my concerns about the contents of FAR Case 2002-011.

This proposed rule purports to enhance the efficiency of governmental printing activities by giving federal agencies the flexibility to choose to have their printing done at locations other than the U.S. Government Printing Office (GPO).

My concerns about this proposed rule stem from my role as a federal depository librarian with 13 years experience providing public access to government information. I believe this rule, if adopted, will decrease public access to government information. Without requiring agencies to go through GPO to publicly disseminate their information products, it is highly unlikely these resources will reach the public in formats other than electronic copies available on the issuing agencies websites which are subject to removal by these agencies whenever their contents become politically inconvenient.

Requiring agencies to submit their publications to GPO insures that these publications will be properly cataloged and indexed thus facilitating public access to their intellectual content. Having these publications distributed to GPO also increases the likelihood that these materials will have their publication dates on the document which is a highly important matter for those wishing to cite those documents in reports or papers.

GPO has a highly successful record in providing federal depository libraries and the general public with timely and effectual access to government information resources. Individual federal agencies do not have such experience in working with the depository library community as a collective entity or with individual federal depository libraries in an effective manner. GPO's own experience with private service microfiche contractors, which has periodically produced microfiche production backlogs and even defaults by these

2002-011-27

contractors, illustrates the flaws inherent in placing excessive reliance on a decentralized system of federal information dissemination.

FAR 2002-011 will also increased the likelihood that agencies will not archive electronic versions of their information resources on their websites in order to ensure permanent public access to these resources. Recent controversy involving efforts by the U.S. Department of Education to remove content from their website produced by this agency during the Clinton Administration vividly illustrates the dangers of not having concrete statutory guidance for permanent public access to federal information resources. Having these information resources distributed through GPO, regardless of their physical format, ensures permanent public access to these resources regardless of whether their public policy or political viewpoints are in favor with the current federal administration.

In addition, FAR 2002-011 gives federal agencies or private sector contractors no concrete or credible initiative to distribute their publications to GPO despite laudable rhetoric in this proposal indicating support for distributing this information to GPO. Already many federal agencies and component parts of these agencies, do not distribute their information resources to GPO. This can stem from their ignorance of existing statutory requirements to distribute these resources to GPO or from the refusal fo some of these agencies to distribute these products to GPO or inform GPO of information resources they possess. Until this problem is rectified, the problem of fugitive documents will continue to exist. Unfortunately, I fear that the contents of FAR 2002-011 will exacerbate this situation instead of ameliorating it.

I urge you to reject the current contents of FAR 2002-011 and work with the depository library community and GPO to come up with a solution that will enhance federal printing economy and efficiency and further enhance public access to the myriad information resources produced by federal agencies at taxpayer expense.

Thank you for your attention to these concerns.

Sincerely,

Bert Chapman
Government Publications Coordinator/
Associate Professor of Library Science
HSSE Library
258 Stewart Center
Purdue University
West Lafayette, IN 47907-1530
(765) 494-2837

2002-011-28



"The Culhams"
<culham@teleport.com
>

To: farcase.2002-011@gsa.gov
cc: dduperon@fs.fed.us
Subject: FAR Case 2002-011 - Comment

11/26/2002 10:37 PM

November 27, 2002

General Services Administration
FAR Secretariat (MVA)
Attn: Laurie Duarte
1800 F Street, NW - Room 4035
Washington, DC 20405

SUBJECT: FAR Case 2002-011

As a career acquisition professional with multi-Federal agency experience I agree fully with relaxing the requirements regarding use of GPO for printing. However, I disagree with the proposed changes to FAR Part 8.8 that provide new procedures for acquisition of printing services related to publication or synopsis of need.

It is my belief that the proposed changes fly in the face of the intent Federal Acquisition Streamlining Act by placing the proposed advertising requirements on printing needs of less than \$25,000.00. Holding printing acquisitions to a higher standard not only encumbers such acquisitions by holding them to a higher standard than other acquisitions, the additional need for the required advertisement increases the administrative expense associated with completing such acquisitions. Simply the hoped for savings by using the commercial marketplace will be offset by the proposed higher bureaucratic standard. Most importantly acquisition professionals on a daily basis determine the most effective and efficient way to secure competition that ensures best value procurements. Allowing this individual professional judgement to determine the best route for printing acquisitions, which are an almost daily need of every agency, should not be clouded with rules on process that are at a higher standard than for other routine needs.

Based on my views I propose the following changes to the proposed rule.

· 8.801(b)(2)(i) - The title of this paragraph should be changed to "Synopsis Requirements" and should further read that "Printing needs shall be publicized in accordance with FAR Part 5."

All other portions of the proposed wording are acceptable as is.

I thank you in advance for your consideration of these proposed changes to the FAR Case 2002-011.

Sincerely,

Carl R. Culham, CACM
1255 S.W. Blaine Court
Gresham, OR 97080

2002-011-29



"Eric Dahlen"
<edahlen@umd.edu>
11/26/2002 03:17 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

Dear Sir or Madam,

Based on my experience as a librarian in a Federal Depository Library, it is my opinion that the proposed changes to FAR would have a significant, long-term negative impact on public access to government information.

As the Congress and President both believe will be true with the newly formed Department of Homeland Security, centralized control of a government function provides increased efficiency and improved oversight. The Government Printing Office currently provides this sort of control for government printing. Eliminating that control by allowing agencies to procure their own printing will, in my opinion, result in the following:

- * agency printing costs will increase;
- * fewer small printing companies will receive government contracts;
- * agency publications will cease to include standard bibliographic elements, such as the publication date, that GPO has trained them to include;
- * fewer agency publications will come to the attention of GPO to be included in their cataloging and indexing program, hence the existence of these publications will not be known by future researchers;
- * the distribution of agency publications to Depository Libraries will decrease dramatically, thereby decreasing long-term public access to those publications.

Though the proposal claims the changes will help to resolve the problem of "fugitive documents" that fail to make it to Depository Libraries, I am highly doubtful. The proposed procurement process is similar to the process currently used for state publications in Louisiana. Using centralized printing has a much lower percentage of "fugitive" documents than a decentralized system.

OMB is obviously concerned about government agencies competing with the private sector in the performance of commercial activities, however GPO is already subject to such competition. A large percentage of the printing GPO oversees is contracted out to private printers. Just as the agencies in question would have to analyze whether it would be sufficient to photocopy a publication in-house rather than contract for printing, GPO currently analyzes printing jobs and contracts out those that can best be performed by private printers. GPO's expertise in negotiating these contracts and the economies of scale they can create will be lost if agencies begin negotiating directly with private printers.

I sincerely hope the proposed changes to FAR will not be approved.

--

Eric Dahlen
Librarian, Government Documents & Maps
4118 McKeldin Library
University of Maryland
College Park, MD 20742-7011
301.314.1356

202-011-30



"MARQUARDT,
STEVE"
<STEVE_MARQUARDT
@SDSTATE.EDU>

11/27/2002 05:44 PM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc: "Daschle Senator Tom (Daschle, Senator Tom)"
<Tom_Daschle@daschle.senate.gov>, "Thune John (Thune, John)"
<jthune@mail.house.gov>, "Johnson Tim (Senator) (Johnson, Tim
(Senator))" <tim@johnson.senate.gov>
Subject: FAR case 2002-011 re Government Printing Office

Attention Laurie Duarte:

I understand that the Federal Acquisition Regulation Council is proposing to amend the FAR regulations to comply with Office of Management and Budget (OMB) Memorandum #M-02-07 which addressed Government Printing Office (GPO) printing and duplicating services. In the proposed rule, the FAR Council, on behalf of the three agencies, is requesting that they be able to contract out the printing functions. GPO would also be able to compete for such contracts.

The FAR Council has asked for public comment on requiring the following clause:

INFORMATION DISTRIBUTION

"To assist the Government in ensuring effective distribution of Government publications printed under this contract, the contractor shall submit one copy of each Government publication, as identified by the Government in the contract, to the Superintendent of Documents from the Government Printing Office. Transmission shall be made using electronic means unless such means are unavailable."

Ms. Duarte, please know that my concern is not only that OMB proposes to violate the law and congressional budget directives, specifically the Continuing Resolution H.J.Res. 120, that extended funding until Nov 22, 2002, and which contained language regarding GPO and the OMB printing proposal, specifically prohibiting OMB from producing the budget documents anywhere other than GPO.

Moreover, implementing **this OMB proposal will deny ready access to these most important government documents to the channels of distribution that make them most freely and conveniently available to the American public** through public sales and through libraries such as mine here in Brookings, at South Dakota State University.

I thank you for your attention to this important matter of access to government information by our libraries and the students and citizens who use them.

Steve Marquardt, Ph.D.
Dean of Libraries
Box 2115
South Dakota State University
North Campus Drive
Brookings, SD 57007-1098
605-688-5106
FAX: 605-688-6133
steve_marquardt@sdstate.edu

2002-011-31



"anton weck"
<antonweck@mindspring.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 02:47 AM

November 27, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I am leery that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

anton weck
1390 vincenzo drive
Toms River, NJ 08753
USA

2002-011-32



"David Barry"
<djbarry@iname.com>
11/28/2002 03:00 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Barry
160 West Rd Apt D42
Pleasant Valley, NY 12569
USA

2002-011-33



"Mike Carlson"
<domitianx@domitianx.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:03 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Mike Carlson
1119 2nd St NW
Faribault, MN 55021
USA

2002-011-34



"Dennis Wendorf"
<dwendorf@bigfoot.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:04 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Dennis Wendorf
190 Nancy Dr
East Meadow, NY 11554
USA

2002-011-35



"Chris Adams"
<chris@improbable.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:10 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Chris Adams
6448 Bell Bluff
San Diego, CA 92119
USA

2002-011-36



"Paul Schreiber"
<eff@paulschreiber.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:10 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Paul Schreiber
388 Stowell Avenue
Sunnyvale, CA 94085
USA

2007-011-37



"Douglas Welch"
<douglas@welchwrite.
com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:12 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Douglas Welch
5916 Vesper Avenue
Van Nuys, CA 91411
USA

2002-011-38



"Adam Stewart"
<eff@adamstew.com>
11/28/2002 03:16 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Adam Stewart
534 Bigham Rd
Pittsburgh, PA 15211
USA

2002-011-39



"Andrew Patton"
<b0bd0le@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:17 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Andrew Patton
2435 Camberwell Ct
Des Peres, MO 63131
USA

2007-011-40



"Jay Joslin"
<jrj@joslinpi.com>

11/28/2002 03:17 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jay Joslin
P.O. Box 47317
Seattle, WA 98146
USA

2002-011-41



"Adrian P. Sinnott"
<apsinnott@mac.com>
11/28/2002 03:18 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Adrian P. Sinnott
27 East 24th Street
Huntington Station, NY 11746
USA

2002-011-42



"Chris Stehlik"
<chrisfs59@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:18 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Chris Stehlik
2137 Rose St
Berkeley, CA 94709
USA

2002-011-43



"Richard Satterfield"
<esad52@earthlink.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:43 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Richard Satterfield
111 N River St
Montgomery, IL 60538
USA

2007-011-44



"Aslak Evang"
<nyogtha@flipp.net>
11/28/2002 03:45 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Aslak Evang
Valkyrjegt 43
Stavanger, 4011
Norway

2002-011-45



"Ilan Rabinovitch"
<ilan@fonz.net>

11/28/2002 03:45 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Ilan Rabinovitch
18040 Calvert St
Encino, CA 91316
USA

2002-011-46



"John Osgood"
<josgood@direcway.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:48 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Osgood
PO Box 2139
460 Whiski Road
Priest River, ID 83856
USA

2002-011-47



"Florian Hines"
<frhines@swbell.net>
11/28/2002 03:50 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Florian Hines
627 Bobcat Crk
San Antonio, TX 78251
USA

2002-011-48



"Pedro J.
Rivera-Torres"
<pedrito@tds.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:50 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Pedro J. Rivera-Torres
2308 University Ave. #79
Madison, WI 53726
USA

2002-011-49



"Jonah Petri"
<skrap@mac.com>
11/28/2002 03:51 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jonah Petri
86 Glezen Lane
Wayland, MA 01778
USA

2002-011-50



"Max Ribble"
<slothman@amurgsval
.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:51 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Max Ribble
234 N Murphy Ave.
Sunnyvale, CA 94086
USA

2002-011-51



"Charles Williams"
<chuck6@softhome.net>
t>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 04:00 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Charles Williams
RR 1 Box 163J
Weirton, WV 26062
USA

2002-011-52



"Tom Mitchell"
<root@cellularsecrets.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:59 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Tom Mitchell
831 Paani St Apt C
Honolulu, HI 96826
USA

2002-011-53



"Matt Jurach"
<phat@omsoft.com>
11/28/2002 04:08 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Matt Jurach
4201 Stowe Way
Sacramento, CA 95864
USA

2002-011-54



"Jim Glen"
<thx1955@yahoo.com>
11/28/2002 04:11 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jim Glen
5901 Copper Canyon Drive
The Colony, TX 75056
USA

2002-011-55



"Billy Smith"
<besmithx@houston.r.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 04:17 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Billy Smith
16307 Golden Sage LN
Cypress, TX 77429
USA



"Donna-Jean Marsula"
<scotswoman@nc.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 04:23 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Donna-Jean Marsula
225 Carriage Trl
Raleigh, NC 27614
USA

2002-011-57



"Ron Lauzon"
<rlauzon@acm.org>
11/28/2002 04:25 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Ron Lauzon
4352 Pine Ridge Pkwy
Apt 103
Grand Rapids, MI 49525
USA

2007-011-58



"Mike Rodak"
<mrodak@adelphia.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 04:33 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Mike Rodak
1135 Western Ln
Erie, PA 16505
USA

2007-011-59



"Tague Griffith"
<tague@minion.net>
11/28/2002 04:39 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Tague Griffith
249 Noe
San Francisco, CA 94114
USA

2002-011-60



"Thomas Ballingall"
<TBallingall@ziplip.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 04:40 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Thomas Ballingall
4045 Baltimore Ave
D5
Philadelphia, PA 19104
USA

2002-011-61



"Travis Shulka"
<t_shulka@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 04:43 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Travis Shulka
624 South 17th Street
La Crosse, WI 54601
USA

2602-011-62



"Michael Fischer"
<ineedbrain@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 04:50 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Fischer
5628 Ferry St.
Vermilion, OH 44089
USA

2002-011-63



"thomas m. tordel jr"
<tmt@htva.net>

11/28/2002 04:51 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

thomas m. tordel jr
216 enfield main roadRD#5
Ithaca, NY 14850
USA

2002-011-64



"Julio Mandojana"
<jcm@paco.magoya.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 05:05 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Julio Mandojana
454 Country View Ln
Le Sueur, MN 56058
USA

2002-011-65



"Michael
Andrzejewski"
<mandrzejewski@milw
aukeepc.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 05:07 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Michael Andrzejewski
3145 S. 12th St.
Milwaukee, WI 53215
USA

2002-011-66



"Kevin Owen"
<kowen@crimson-net.
com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 05:23 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Kevin Owen
29 Old Coach Road
Napa, CA 94558
USA

2002-011-67



"James Higgs"
<curiousj@adelphia.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 05:38 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

James Higgs
473 Albemarle Avenue
Staunton, VA 24401
USA

2002-011-68



"James Grimaldi"
<jg10101@msn.com>
11/28/2002 05:51 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

James Grimaldi
669 Washington St., # 101
Denver, CO 80203
USA

2007-011-69



"David Solomon"
<dsolomon@msu.edu>
11/28/2002 05:57 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

David Solomon
5946 Eagles Way
Haslett, MI 48840
USA

2002-011-70



"Randy Wieck"
<rwieck@cityofstfrancisc.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 05:57 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Randy Wieck
PO Box 1192
Saint Francis, KS 67756
USA

2002-011-71



"Gernot Krobath"
<macgyver01@gmx.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 06:07 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gernot Krobath
911 Imhoff Road
App. #653
Norman, OK 73072
USA

2002-011-72



"John Lynch"
<jslynch@hotmail.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011
>

11/28/2002 06:17 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Lynch
RR 6 Box 1504
Lake City, FL 32025
USA

2002-011-73



"Michael Miller"
<escoiffer611@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 06:28 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Miller
1927 PHILLIPS ave
Berkley, MI 48072
USA

2002-011-74



"Jay Anderson"
<jla@houston.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 06:31 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jay Anderson
10023 Pinehurst St
Baytown, TX 77521
USA

2002-011-75



"Andrew Cripps"
<acripps@nyc.rr.com>
11/28/2002 06:32 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Andrew Cripps
75-16 Edsall Ave
Glendale, NY 11385
USA

2002-011-76



"Devon Bowen"
<devon@pobox.com>
11/28/2002 06:35 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Devon Bowen
2 Annamarie Terrace
Cheektowaga, NY 14225
USA

2002-011-77



"Jack Paxton"
<jack1_j@hotmail.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 06:41 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jack Paxton
113 E Sandusky St Apt B
Findlay, OH 45840
USA

2002-011-78



"James Willeke"
<jim@willeke.com>
11/28/2002 06:50 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

James Willeke
37 Grant Street
Butler, OH 44822
USA

2007-011-79



"John Apa"
<jadma@infonline.net>
11/28/2002 06:50 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

John Apa
3965 Hogback Rd.
Hermitage, PA 16148
USA

2002-011-80



"Michael McDermott"
<mcmikey@surfbest.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 06:55 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Michael McDermott
18645 Detroit Ave
Suite 414
Lakewood, OH 44107
USA

2007-011-81



"Steve Talbot"
<darcknyte@westelco
m.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:04 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Steve Talbot
PO Box 35
28999 Old Townsprings Road
Chaumont, NY 13622
USA

2002-011-82



"chris stone"
<istone@mac.com>
11/28/2002 07:16 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

chris stone
732 Pleasant Hill Rd
Ellicott City, MD 21043
USA

2002-011-83



"Nathan Tuck"
<ntuck1@san.rr.com>
11/28/2002 07:28 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Nathan Tuck
3103 Evening Way
La Jolla, CA 92037
USA

2002-011-84



"Sam Morgan"
<jass@wcc.net>

11/28/2002 07:33 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Sam Morgan
1821 S Pierce St
Apt.9
San Angelo, TX 76904
USA

2002-011-85



"Ross Pincus"
<rosspincus@comcast
.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:39 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Ross Pincus
128 Birkdale Dr
Blue Bell, PA 19422
USA

2007-011-86



"Lloyd tolbert"
<treb3@army.net>

11/28/2002 07:40 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Lloyd tolbert
904 Luck St
Martinsville, VA 24112
USA

2002-011-87



"Michael Semones"
<msemones@charter.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:44 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Semones
114 Shadow Creek Ln
Anderson, SC 29621
USA

2002-011-88



"Steve Pelletier"
<WZAJMYKXHDIA@sp
ammotel.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:46 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Steve Pelletier
1231 Oaklawn Rd
Arcadia, CA 91006
USA

2002-011-89



"Lisa Cheney"
<lisaanncheney@insig
htbb.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:50 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Lisa Cheney
1741 S Lincoln St
Peru, IN 46970
USA

2002-011-90



"Brian Schuitema"
<red95delsol@attbi.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:53 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Brian Schuitema
1171 Sherwood Rd
Muskegon, MI 49441
USA

2002-011-91



"John Sadler"
<john@johnsrealm.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:56 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Sadler
5221 Davis Love Dr.
Cumming, GA 30041
USA

2002-011-92



"John Nerad"
<jnerad@bellsouth.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:58 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Nerad
983 Westmoor Dr NW
Atlanta, GA 30314
USA

2002-011-93



"George Robinson"
<grcomm@concentric.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:09 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

George Robinson
116 Pinehurst Avenue, K-12
New York, NY 10033
USA

2002-011-94



"M. Magee"
<magicm@mindspring.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:09 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

M. Magee
523 Grimes Ave
Naperville, IL 60565
USA

2002-011-95



"Wayne Eaker"
<wayne@zenquest.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:10 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Wayne Eaker
1511 Pine Valley Blvd, #18
Ann Arbor, MI 48104
USA

2002-011-96



"Scott Quigley"
<scottquigley@cox.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:14 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Scott Quigley
606 Ashford Pl
Newport News, VA 23602
USA

2002-011-97



"Jeffrey A. Utay, Esq."
<jautay@directvinterne
t.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:16 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jeffrey A. Utay, Esq.
14927 Englebrook Drive
Houston, TX 77095
USA

2002-011-98



"Paul O'Neil"
<bootzilla6@attbi.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:25 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Paul O'Neil
31 Merrimack st
Methuen, MA 01844
USA

2002-011-99



"Winston King"
<crisfori@mindspring.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:25 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Winston King
1355 Euclid Avenue Apt. 15A
Atlanta, GA 30307
USA

2002-011-100



"Daniel Barnett"
<steno@att.net>

11/28/2002 08:30 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Daniel Barnett
3604 Waldo Ave
Bronx, NY 10463
USA

2002-011-101



"Eric Brake"
<ebrake2002@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:30 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Eric Brake
1708 Jan Dr
Hopkinsville, KY 42240
USA

2007-011-102



"Gregory Caruso"
<gcaruso@verizon.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:33 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Gregory Caruso
29 Melville Avenue
Dorchester, MA 02124
USA

011-103



"Andre Croy"
<dreadlord79@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:50 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Andre Croy
8500 Longview Rd.
Kansas City, MO 64134
USA

011-104



"David Troesch"
<efforg@datmail.com>
11/28/2002 09:53 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Troesch
160 Arbor Way
a9
Dallas, GA 30157
USA

011-105



"Aaron Swartz"
<me@aaronsw.com>
11/28/2002 09:47 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Aaron Swartz
349 Marshman
Highland Park, IL 60035
USA



"Jesse Bradley IV"
<turbulenttiger@excite
.com>

11/28/2002 08:52 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011 106

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jesse Bradley IV
1 Oakdale St
Warwick, RI 02888
USA



"David Hamilton"
<gunslinger1973@earthlink.net>

11/28/2002 08:58 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-107

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Hamilton
4607 Halfmoon Valley Rd
Warriors Mark, PA 16877
USA

011-108



"George DeGiovanni"
<csp@comsysplus.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:02 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

George DeGiovanni
230 Emily Dr
Park Ridge, NJ 07656
USA

011-109



"Thomas O'Grady"
<ogradytommy@aol.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:03 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Thomas O'Grady
28 Beach Street
Rochester, NY 14621
USA

011-110



"Michael Passer"
<mwp@acm.org>
11/28/2002 09:01 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Passer
8962 E. 54th St.
Raytown, MO 64133
USA

2002-011-111



"Thomas Tubbs"
<tom@tubbs.us>

11/28/2002 08:34 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Thomas Tubbs
3898 Corye Ln
Marietta, GA 30066
USA



"erik martin"
<e@t-me.org>

11/28/2002 08:42 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-112

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

erik martin
603 oaktree dr.
Chapel Hill, NC 27517
USA



"Jeffrey Bodenstein"
<neoaj123@earthlink.net>

11/28/2002 08:51 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-113

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeffrey Bodenstein
171 Auld Spanish Ct # A
Ballwin, MO 63011
USA

011-114



"Patrick O'Donoghue"
<pdiddyod@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:02 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Patrick O'Donoghue
227 Sullivan Street
Apt. 2D
New York, NY 10012
USA

011-115



"Dylan Battard"
<puptmstr@bellsouth.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:04 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Dylan Battard
19270 sw 256 st
Homestead, FL 33031
USA

011-116



"Keith Johnson"
<keith@foo.balk.ws>
11/28/2002 09:07 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Keith Johnson
451 Trina St
Gallatin, TN 37066
USA



"Jeffrey Dubinsky"
<jefreyd@digexdesign
.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-117

11/28/2002 09:17 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jeffrey Dubinsky
16944 Apache Dr
Greenwell Springs, LA 70739
USA

011-118



"Keith Mohill"
<kmo170@attbi.com>
11/28/2002 09:18 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Keith Mohill
997 webster Ln.
Des Plaines, IL 60016
USA

011-119



"Joseph Lane"
<laneja@mindspring.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:18 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Joseph Lane
540 Putters Court
Alpharetta, GA 30022
USA

011-120



"Eric Bass"
<ejbass@bellsouth.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:28 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Eric Bass
817 Rutland Rd
Tifton, GA 31794
USA

011-121



"Roger Lemay"
<fivearrow@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:40 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Roger Lemay
191 Seames Drive
Manchester, NH 03103
USA



"Ken Hovater"
<440.volt@charter.net>
11/28/2002 09:44 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-122

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ken Hovater
5399 SE Sedgwick Rd
Port Orchard, WA 98366
USA

011-123



"Brian Hasenstab"
<hasenstb@alexia.lis.u
iuc.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:45 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

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Sincerely,

Brian Hasenstab
806B S. Johnson Ave.
Carbondale, IL 62901
USA

011-124



"Elizabeth Spatz"
<spatz@robnet.com>
11/28/2002 09:46 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I am leery that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Elizabeth Spatz
1500 Green Mountain Dr
Little Rock, AR 72211
USA



"Theron Schultz"
<trs@houston.rr.com>
11/28/2002 09:46 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-125

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Theron Schultz
1038 Rosepoint St
Houston, TX 77018
USA

011-126



"Donald Lett"
<lettd@bellsouth.net>
11/28/2002 09:54 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Donald Lett
60 Rochester Rd
Beaver Dam, KY 42320
USA



"Charles Thompson"
<cthompson@adelphia
.net>

11/28/2002 09:55 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-127

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Charles Thompson
294 South Park Drive
Aurora, OH 44202
USA



"Ernest Keet"
<ekeet@vatlantic.com>
11/28/2002 09:57 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-128

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ernest Keet
P.O. Box 1199
Saranac Lake, NY 12983
USA



"Anthony Engel"
<anthony.engel@pobox.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:57 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-129

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Anthony Engel
9 Fairfield St Apt 3R
Cambridge, MA 02140
USA



"Matt Brown"
<matt@projectpenguin.com>

11/28/2002 09:58 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-130

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Matt Brown
2974 Marquett St
San Diego, CA 92102
USA



"Kevin McAllister"
<kevin@mcallister.ws>
11/28/2002 09:59 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-131

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO).

Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kevin McAllister
150 Thunder Cir
Bensalem, PA 19020
USA



"Matthew Gregory"
<totalnrg@mac.com>
11/28/2002 09:59 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-132

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Matthew Gregory
120 Charter Oaks Condo #3
Amherst, NY 14228
USA



"Gerald Dalton"
<gdalton@worldnet.at
t.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:01 AM

011-133

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gerald Dalton
874 Benedetti Drive #202
Naperville, IL 60563
USA



"kristen looper"
<pixie@pixiemartin.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-134

11/28/2002 11:08 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

kristen looper
1039 Club Rd NE
Cedar Rapids, IA 52404
USA



"Michael Jones"
<mcj@bluetonic.org>
11/28/2002 10:03 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-135

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO).

Specifically,

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Sincerely,

Michael Jones
14922 W. 147th St.
Olathe, KS 66062
USA



"David Solimano"
<davidsolimano@usa.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:05 AM

011-136

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Solimano
1333 Manor Cir
Pelham, NY 10803
USA



"Paul Rodriguez"
<sangretoro@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:05 AM

011-137

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Paul Rodriguez
312 43rd St.
Union City, NJ 07087
USA



"Nick Tsourakis"
<viclono@aol.com>
12/01/2002 07:51 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-138

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Nick Tsourakis
10504 Orange Grove Ct
Tampa, FL 33618
USA



"Tim Goral"
<tgoral@appleisp.net>
11/28/2002 10:08 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-139

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO).

Specifically,

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Sincerely,

Tim Goral
6 Olive St
Danbury, CT 06810
USA



"Michael Liepshutz"
<michali@ameritech.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:12 AM

011-140

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Liepshutz
11967 Diehl Dr.
Sterling Heights, MI 48313
USA



"Jeffrey Patterson"
<dpatters@neo.rr.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:13 AM

011-141

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeffrey Patterson
1953 15th St
Cuyahoga Falls, OH 44223
USA



"Michael Barnard"
<mike@bleeding-head.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:17 AM

011-142

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Michael Barnard
27 Hadley Rd.
apt 187
Sunderland, MA 01375
USA



"Mike Wells"
<Mike.Wells@unishippers.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:21 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I am leery that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Mike Wells
111 Broady Ln
Maryville, TN 37803
USA

011-143



"Donald Sanders"
<dsande24@bellsouth.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:25 AM

011-144

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Sincerely,

Donald Sanders
301 Hickory St SE
Hartselle, AL 35640
USA



"Sean Barrett"
<sean@epoptic.com>

11/28/2002 10:25 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-145

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Sean Barrett
8455 Naylor Ave
Los Angeles, CA 90045
USA



"Richard Maxson"
<indie1138@comcast.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:29 AM

011-146

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Richard Maxson
15680 Dasher Ave
Allen Park, MI 48101
USA



"Charles Darby"
<charlesdarby@att.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:34 AM

011-147

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Charles Darby
1904 Kenwyck Manor Way
Raleigh, NC 27612
USA



"Robert Anderson"
<andersonrg1@attbi.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:38 AM

011-148

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Anderson
118 Dale St.
Jefferson Hills, PA 15025
USA



"Jonathan Markowitz"
<ash_ketchum_111@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:39 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jonathan Markowitz
3775 Street Road
P.O. Box 656
Lahaska, PA 18931
USA

011-149



"Sara Skinner"
<narnia@velvet.net>
11/28/2002 10:39 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-150

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Sara Skinner
29 South Bedford St.
Burlington, MA 01803
USA



"christopher moore"
<thepotatopeeler@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:41 AM

011-151

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

christopher moore
603 Old Westminster Pike
Westminster, MD 21157
USA



"Gary Poland"
<gcpoland@adelphia.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:42 AM

011-152

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gary Poland
PO Box 453
Kingston, NH 03848
USA



"Angus Scott-Fleming"
<freedom@geoapps.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:42 AM

011-153

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Angus Scott-Fleming
6902 E Soyaluna Place
Tucson, AZ 85715
USA



"Joseph Blaylock"
<jrbl@jrbl.org>
11/28/2002 10:42 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-154

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joseph Blaylock
3209 East 10th Street
Apt I-7
Bloomington, IN 47408
USA

011-155



"Graham Andrews"
<animefortress@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 08:18 PM

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Graham Andrews
766 Grant Place
Boulder, CO 80302
USA

011-156



"Joel Braverman"
<onephatcat@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 07:41 PM

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

As you know from previous letters I have sent you, I am a strong believer in individual freedom and in freedom of speech, open government, and the extension and preservation of these freedoms into the electronic world. Because of this, I am signing this letter from the Electronic Frontier Foundation.

As my congresspersons and senators, I expect you to fight to the death to preserve open government and freedoms. We can never sell our freedoms for the illusion of security.

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joel Braverman
179 Nymph Road
Bolinan, CA 94924
USA



"Peter de Jesus"
<ppem-qtvr@xemaps.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 01:27 PM

011-157

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Peter de Jesus
12529 Vicente Place
Cerritos, CA 90703
USA



"Andrew Lewman"
<andy@lewman.com>
11/28/2002 10:42 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-158

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO).

Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Andrew Lewman
27 Fulton Street
Dedham, MA 02026
USA

011-159



"Damian Rickard"
<drickard@99main.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:47 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Damian Rickard
21 Oxford Dr
Norwich, CT 06360
USA



"Johnny Davis Jr"
<trumaster22@msn.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:48 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Johnny Davis Jr
701 Essex Park Drive
Hampton, VA 23669
USA

011-160



"Allen Campbell"
<7alcam@ttc-cmc.net>
11/28/2002 10:50 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-161

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Allen Campbell
2 Church St.
Zurich, MT 59547
USA

011-162



"Karen Groffel"
<kgroffel@aol.com>
11/28/2002 10:50 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Karen Groffel
36-25 48 st.
Astoria, NY 11103
USA



"Eric Anderson"
<ehanderson@alumni.
grinnell.edu>

11/28/2002 10:55 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-163

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Eric Anderson
638 E. 12Th Ave #2
Denver, CO 80203
USA



"Mike Irwin"
<mikeirw@pobox.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:55 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Mike Irwin
116 W Chestnut St
Apt 8
Asheville, NC 28801
USA

011-164



"John Clark"
<shogun@12ftguru.com>

11/28/2002 10:57 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-165

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Clark
765 Meadowbrook Drive
McDonough, GA 30253
USA



"Joseph Pawlak"
<eff.20.joep@spangou
rmet.com>

11/28/2002 10:58 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-166

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joseph Pawlak
5649 W 56th St
Chicago, IL 60638
USA



"Jonathan Silver"
<KingsKnight1@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:58 AM

011-167

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

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Sincerely,

Jonathan Silver
13C Van Winkle Street
Bloomfield, NJ 07003
USA



"Mark Durkin"
<mdurkin187@aol.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:18 PM

011-168

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Mark Durkin
13 Winnemay Street
Natick, MA 01760
USA



"C H Groffel"
<astor56@aol.com>
11/28/2002 11:03 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-169

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

C H Groffel
3025 48th street
Long Island City, NY 11103
USA



"Robert Warner"
<bob.warner@4warner.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:03 AM

011-170

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Robert Warner
26 Oakland St Apt 8
Aurora, CO 80012
USA



"Toby Woller"
<effector@sleepersaw
ake.com>

11/28/2002 11:10 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-171

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Toby Woller
3553 N Paulina St Apt 3
Chicago, IL 60657
USA



"Thomas Poe"
<tompo@renonevada.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:10 AM

011-172

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Thomas Poe
241 Crampton
Reno, NV 89502
USA



"James D Bailey"
<jdbailey@monmouth.com>

11/28/2002 11:10 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-173

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

James D Bailey
7 Annapolis Street
Tinton Falls, NJ 07712
USA



"Galen Rubel"
<galenr@bellsouth.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:14 AM

011-194

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Galen Rubel
3680 N 56th Ave
Apt 817
Hollywood, FL 33021
USA

011-175



"Ross Vandegrift"
<ross@willow.seitz.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:16 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Ross Vandegrift
530 School Road
Lincoln University, PA 19352
USA



"Erica Hulstrom"
<californiarose1976@h
otmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:18 AM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Erica Hulstrom
1003 Warbonnet Dr
Perris, CA 92570
USA

011-176



"Jonathan Peterson"
<jonathan@kirschlerpeterson.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:18 AM

011-177

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jonathan Peterson
1157 Virginia Ave, NE
Atlanta, GA 30306
USA



"Jerrold Kaplan"
<jjk@digobj.com>

11/28/2002 11:20 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-178

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jerrold Kaplan
9600 S Ocean Drive
#1502
Jensen Beach, FL 34957
USA



"Gene Mance"
<g_mance@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:21 AM

011-179

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gene Mance
191 E. Tremont Street
Pasadena, CA 91103
USA



"Aaron Mayzes"
<aaron@mayzes.net>
11/28/2002 11:23 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-180

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Aaron Mayzes
8405 E Hampden Ave
Apt. 15-L
Denver, CO 80231
USA



"Jay Rapaport"
<jmrzx@comcast.net>
11/28/2002 11:24 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-181

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Jay Rapaport
414 Redland Blvd.
Rockville, MD 20850
USA



"Charles Robinson"
<chrobinson@comcast
.net>

11/28/2002 11:26 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-182

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Charles Robinson
876 Twinlyn Dr.
Lansdale, PA 19446
USA



"Travis Brookins"
<fdsman2002@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:34 AM

011-183

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Travis Brookins
6972 W Hibbard Road
Ovid, MI 48866
USA



"Patrick Lombardo"
<pjlombar@cs.wmich.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:35 AM

011-184

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Patrick Lombardo
220 S. Kendall Ave.
Apt. 10
Kalamazoo, MI 49006
USA



"David Ludwig"
<ydrof@hotmail.com>
11/28/2002 11:36 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-185

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Ludwig
3185 Moroe ST
Carlsbad, CA 92008
USA



"Kapil Sachdev"
<kapil@kapilville.com>
11/28/2002 11:38 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-186

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Kapil Sachdev
PO Box 655
Saint Charles, IL 60174
USA



"Lance Heller"
<lheller@unidial.com>
11/28/2002 11:39 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-187

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Lance Heller
1713 E. Reno St.
Broken Arrow, OK 74012
USA



"David Hayes"
<david@hayes-family.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>

cc:

Subject: I Oppose FAR Case 2002-011

11/28/2002 11:45 AM

011-188

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Hayes
6705 County Road 134
Celina, TX 75009
USA



"Beverlee Couillard"
<cbeverlee@earthlink.net>

11/28/2002 11:47 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-189

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Beverlee Couillard
4801 E Sahara Ave Apt 307
Las Vegas, NV 89104
USA



"Richard Smith"
<rich252@worldnet.att.net>

11/28/2002 11:49 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-190

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Richard Smith
1526 Great Hwy #3
San Francisco, CA 94122
USA



"Kevin Lampe"
<klampe@beatricene.com>

11/28/2002 11:53 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-191

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Kevin Lampe
808 Grant St
Beatrice, NE 68310
USA



"Eric Blomstrom"
<eff.org@blomstrom.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:58 AM

011-192

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Eric Blomstrom
99 Linwood Street
2nd Floor
New Britain, CT 06052
USA



"Jay Kloosterman"
<jkloosterman@charte
rmi.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:03 PM

011-193

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jay Kloosterman
9269 East Main
Box 595
Galesburg, MI 49053
USA



"Frank Simmons, Jr"
<fsimmons@swko.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:03 PM

011-194

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Frank Simmons, Jr
1861 N Calhoun Ave
Liberal, KS 67901
USA



"Michael Bolch"
<mjbfamily@surfbest.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:04 PM

011-195

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Bolch
208 Franklin Ave
Suite #3
Nutley, NJ 07110
USA



"Scott Sexton"
<uberfizz@dreamdust.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:06 PM

011-196

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Scott Sexton
4043 N Hermitage
Chicago, IL 60613
USA



"Krister Bruhwel"
<unceasing.bug@verizon.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:06 PM

011-197

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Krister Bruhwel
7 Rutledge Rd
Newport News, VA 23601
USA



"Thomas W. Smith"
<k9sigmod@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:06 PM

011-198

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Thomas W. Smith
9823 Churchill Way Dr
Houston, TX 77065
USA



"Scott Emmett
O'Donnell"
<scottodonnell@yahoo
.com>

11/28/2002 12:07 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-199

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Scott Emmett O'Donnell
671 NE 8th Street
Gresham, OR 97030
USA



"Geo. Pearson"
<kbcnewknee@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:07 PM

2002-011-200

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Geo. Pearson
411 N Alice Way
Unit A
Anaheim, CA 92806
USA



"Brian Fliege"
<brian@netninja.com>
11/28/2002 12:08 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-201

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Brian Fliege
2390 Elden #D
Costa Mesa, CA 92627
USA



"Daniel Thorman"
<djt3@lehigh.edu>

11/28/2002 12:10 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-202

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Daniel Thorman
85 East Mahwah Road
Mahwah, NJ 07430
USA



"Harvey Fishman"
<fishman@panix.com>
11/28/2002 12:10 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-203

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Harvey Fishman
1408 East 49th Street
Brooklyn, NY 11234
USA



"Jay McGavren"
<jaymcgavren@cox.net>
t>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:10 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

0 11-204

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jay McGavren
5416 N 100th Plz Apt 4
Omaha, NE 68134
USA



"Larisa Miller"
<risam@concentric.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:11 PM

011-205

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Larisa Miller
1432 W Lunt Ave Apt 308
Chicago, IL 60626
USA



"Matthew Andrew"
<mzandrew@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:18 PM

011-206

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Matthew Andrew
102 Heacock Crossbrook Rd
New Milford, CT 06776
USA



"Chris Taylor"
<ctaylor@prolinx.net>
11/28/2002 12:18 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-207

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Chris Taylor
121 1/2 N. 36th St.
Omaha, NE 68131
USA



"Edward Melendez"
<e@melendez.org>
11/28/2002 12:20 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-208

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Edward Melendez
920 Spain St.
New Orleans, LA 70117
USA



"Joseph Bury"
<q137@earthlink.net>
11/28/2002 12:21 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-209

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Joseph Bury
3307 S Wallace Ave.
Chicago, IL 60616
USA



"Timothy Talbert"
<tctalbert@mchsi.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:24 PM

011-210

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Timothy Talbert
1807 Ellis Rd NW Apt 3
Cedar Rapids, IA 52405
USA



"John Ziriaux"
<jmz@satx.rr.com>
11/28/2002 12:28 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-211

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

John Ziriaux
115 Verdant
San Antonio, TX 78209
USA



"Keith McFall"
<keith_mcfall@web.de
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:33 PM

011-212

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Keith McFall
7 Burbank Rd
Stafford Springs, CT 06076
USA



"Mark LaGattuta"
<marklagattuta@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:34 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Mark LaGattuta
19847 Saint Francis
Livonia, MI 48152
USA

011-213



"Meredith Tupper"
<meredith@pintsize.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:36 PM

011-214

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Meredith Tupper
3304 West Granada St.
Tampa, FL 33629
USA



"Michael Rolenz"
<microlenz@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 12:50 PM

011-215

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Rolenz
26333 Senator Ave
Harbor City, CA 90710
USA



"Marc Yaxley"
<ohmy-gosh@cox.net>

11/28/2002 12:53 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-216

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Marc Yaxley
6156 Camion Largo
san diego, CA 92120
USA



"Franklin Bynum"
<frank@frankbynum.com>

11/28/2002 12:53 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-217

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Franklin Bynum
1812 Norfolk St
Houston, TX 77098
USA



"Aram Mirzadeh"
<awm@fnol.net>

11/28/2002 12:55 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Aram Mirzadeh
47 Fireside Ln
East Setauket, NY 11733
USA

011-218



"Eugene Falik"
<falik@juno.com>

11/28/2002 12:58 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-219

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Eugene Falik
1034 Dickens Street
Far Rockaway, NY 11691
USA



"Joe Battin"
<jdbattin@attbi.com>
11/28/2002 01:01 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-220

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joe Battin
1436 Lakeshore Dr
Fort Collins, CO 80525
USA



"Robert Amble, Jr."
<robert_amble@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 01:02 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Robert Amble, Jr.
8396 East Court Street
Davison, MI 48423
USA

011-221



"Daniel Webster"
<dannwebster@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 01:06 PM

011-222

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Daniel Webster
8524 Burnet
318
Austin, TX 78757
USA



"Laurie Forti"
<laurie@the-beach.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 01:10 PM

011-223

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Laurie Forti
5401 Collins Ave Apt 226
Miami Beach, FL 33140
USA



"Anne Ewen"
<anneewen@hotmail.com>

11/28/2002 01:13 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-224

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Anne Ewen
1218 Mississippi st
Donaldsonville, LA 70346
USA



"Aaron Thompson"
<meteu@imsa.edu>
11/28/2002 01:14 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-225

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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and Budget's (OMB) proposal on the Government Printing Office (GPO).

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Sincerely,

Aaron Thompson
661 Emmert Dr
Sycamore, IL 60178
USA



"Theo Tanalski"
<theppcat@juno.com>
11/28/2002 01:23 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-226

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Theo Tanalski
12760 Via Cortina
Apt 2
Del Mar, CA 92014
USA



"Joshua Johnson"
<izzysanime@macdial
up.com>

11/28/2002 01:33 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-227

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Joshua Johnson
8 Boyden Rd
Apt 1A
Holden, MA 01520
USA



"Tracy Poff"
<pofft@gmx.net>

11/28/2002 01:35 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-228

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Tracy Poff
Rt.2 Box 48
Hamlin, WV 25523
USA



"Chester Lockett"
<longhornlucky1@cox.net>

11/28/2002 01:39 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-229

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Chester Lockett
6142 N. 7th Ave
Phoenix, AZ 85013
USA



"Michael Blake"
<mblake@frogtown.com>
m>

11/28/2002 01:41 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-230

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Blake
5015 SE Holgate Blvd
Portland, OR 97206
USA



"aaron hafer"
<cenobite069@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 01:41 PM

011-231

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

aaron hafer
327w 2300s
Clearfield, UT 84015
USA



"Tramond French"
<tramondfrench@com
cast.net>

11/28/2002 01:45 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011 232

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Tramond French
2409 Winterhaven Dr
Newark, DE 19702
USA



"Brent Miller"
<yidaki2@earthlink.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 01:48 PM

011-233

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Brent Miller
225 Button Street
Santa Cruz, CA 95060
USA



"David Lentini"
<dplentini@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 01:49 PM

011-234

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

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Sincerely,

David Lentini
1932 California Street
San Francisco, CA 94109
USA



"Logan Lindquist"
<supporteff@llbbl.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 01:59 PM

011-235

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Logan Lindquist
126 Schmidt Dr
Hampshire, IL 60140
USA



"Tony Tovar"
<antony@myrealbox.com>

11/28/2002 01:59 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-236

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Tony Tovar
4091 Morrell St.
San Diego, CA 92109
USA



"Rob Hornick"
<rdhornick@earthlink.net>

11/28/2002 02:20 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-237

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Rob Hornick
528 Mayfair Lane
Naperville, IL 60565
USA



"Peter Dubuque"
<peter@cromulent.com>

11/28/2002 02:34 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-238

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Peter Dubuque
4 Glenwood Ter
Malden, MA 02148
USA



"Nicholas Schoeb"
<nickschoeb@yahoo.com>

11/28/2002 02:39 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-239

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Nicholas Schoeb
705 Brier Court
Bel Air, MD 21015
USA



"Michael Gulinski"
<x98gulinski@yahoo.com>

11/28/2002 02:40 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-240

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Michael Gulinski
5319 Whippoorwill Dr
Kalamazoo, MI 49009
USA



"William Graham"
<tgram@earthlink.net>
11/28/2002 02:42 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-241

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

William Graham
523 S Hudson Ave #6
Pasadena, CA 91101
USA



"Jenny Banker"
<wwwdotcom1@juno.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 02:52 PM

011-242

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jenny Banker
125 Raintree Drive
Taylors, SC 29687
USA



"Richard Hume"
<rich_hume@acm.org>
11/28/2002 03:41 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-243

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Richard Hume
13962 South Maple Hollow Circle
Draper, UT 84020
USA



"Edward D'Ovidio"
<edovidio@comcast.net>

11/28/2002 02:54 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-244

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Edward D'Ovidio
835 Hermitage Ridge
Hermitage, TN 37076
USA



"Robert Raisch"
<info@raisch.com>

11/28/2002 02:58 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-245

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Robert Raisch
15 Mt. Vernon Terrace
Newton, MA 02465
USA



"Robert Haener IV"
<Mrzippo13@aol.com>
11/28/2002 03:01 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-246

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Robert Haener IV
5620 Burnett Dr.
Chesterfield, VA 23832
USA



"Benjamin Benigno"
<nebmaster@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:02 PM

11-247

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Benjamin Benigno
916 Magnolia St
Lake Jackson, TX 77566
USA



"Christian Wehba"
<christian@bentleyfor
bes.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:03 PM

011-248

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Christian Wehba
2049 Century Park E
Suite 2150
Los Angeles, CA 90067
USA



"Garry Doll"
<gmadoll789@evenlink
.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:12 PM

011-249

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Garry Doll
400 Lycoming St
Apt 201
Williamsport, PA 17701
USA



"Marc Moore"
<ni3tzsch3@blazenet.net>
et>

11/28/2002 03:13 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-250

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Marc Moore
212 Brooklyn Dr
York, PA 17402
USA

2002-011251

November 18, 2002
Reference: FAR Case 2002-011

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

Dear Ms. Duarte,

I wish to express my concern regarding FAR Case 2002-011, which proposes changes in federal regulations related to government printing. As you know, the proposed rules would no longer require executive branch agencies to work through the Government Printing Office (GPO) for their printing needs. These regulatory changes threaten the open access to government information that is ensured by the work of GPO through the Federal Depository Library Program (FDLP). Kent State University is one of nearly 1,300 institutions throughout the United States that provide access to government information to the public through the FDLP.

Although the published rules (67 FR 68914) do require executive branch agencies to send an electronic copy of each publication to GPO for public distribution or access through the FDLP, this requirement does not at all guarantee public access to government information.

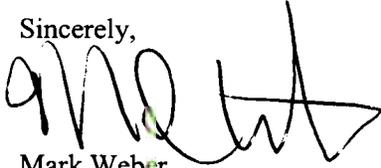
As the background section to the proposed rules indicates, problems with access to government information access are rooted in the failure of executive branch agencies to comply with federal regulations. Currently, the public does not gain access to tax-funded publications and information due to the inability of government agencies to comply with the regulatory requirement that they procure printing through GPO. I am not at all confident that these same agencies will comply with the mandate that an electronic copy of each publication be provided to GPO. By removing GPO from the role of printing provider to government agencies, these rules threaten to relieve it from its role as information disseminator to the public as well.

Even if agencies do provide an electronic copy to GPO, permanent public access is not necessarily ensured. Although the public use of Web-based government information is on the rise, FDLP libraries remain a focal point of government research by assisting clients, providing Web-based access tools, and archiving government information in electronic as well as more tangible formats. However, lifting the requirement that executive branch agencies procure printing through GPO threatens to effectively kill the FDLP. GPO has long suffered from a lack of support and funding, so much of the work that it accomplishes through the FDLP is supported by a cost-recovery model, which relies heavily upon the fees charged to other governmental agencies.

2002-011-251

In these challenging times, our national priorities should focus on increasing the open dialogue between the people of the United States and their government by facilitating the open access to government information upon which democracy is based. Instead of threatening their survival, we should focus on strengthening programs that, like the FDLP, help to guarantee open access to government information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Weber', written in a cursive style.

Mark Weber
Dean of Libraries and Media Services



Director's Office
818 Harlan Hatcher Graduate Library
Ann Arbor, MI 48109-1205
(734) 764-9356
FAX: (734) 763-5080

University Library
The University of Michigan

2002-011-252

VIA FACSIMILE

November 27, 2002

General Services Administration
FAR Secretariat (MVA)
ATTN: Laurie Duarte
1800 F Street, N.W., Room 4035
Washington, D.C. 20405
Facsimile: (202) 501-1986
farcase.2002-011@gsa.gov

Dear Madam:

The proposed Federal Acquisition Regulation on government printing (FAR Case 2002-011) provides a compelling rationale for expanding the bid process to the private sector. It also attempts to strengthen support for the federal depository library system by ensuring one electronic copy of each publication is submitted to the Government Printing Office for distribution.

Although the University of Michigan Library supports the regulation in its overall approach, it also has reservations.

1. **Information Distribution Clause.** The clause, which requires contractors to submit one copy of their publications to GPO in electronic format, should be mandatory. It is the heart of the Federal Depository Library Program. As you know, the program provides government information to all citizens through depository libraries in each Congressional District. The electronic format insures the title will be entered into GPO's permanent archive of government electronic publications.

At minimum, the clause should be expanded to require that agencies submit two paper (or hard) copies to GPO. One copy would be designated for the GPO archival collection of government publications. The second copy could be converted to microfiche for distribution to federal depository libraries if necessary.

Laurie Duarte
General Services Administration
November 27, 2002
Page 2

011-252

There is a possibility that even an expanded version of the clause, including one electronic and two hard copy versions, violates the provisions of 44 USC 1903, which states:

“The cost of printing and binding those publications distributed to depository libraries obtained elsewhere than from the Government Printing Office shall be borne by components of the Government responsible for their issuance.”

Therefore we recommend that the provision be amended to read as follows:

“To assist the Government in ensuring effective distribution of Government publications printed under this contract, the contractor shall submit to the Government Printing Office one copy of each Government publication in electronic format, when such means are available, and a sufficient number of hard copies for depository library distribution. The number of copies will be identified by the Government in the printing contract.”

2. **Enforcement Mechanism.** There should be an enforcement mechanism, or consequences, for agencies that do not provide required copies of a publication to the GPO. The "fugitive document" problem arose because GPO could not impose consequences. Experience has shown that depository programs in states without a central government printer have difficulty obtaining all publications for the state library, let alone its depositories.

There are two issues that the regulation does not address.

3. **Copyright.** Government publications printed by the private sector under government contract cannot be copyrighted. The publishing industry, academic institutions, and individuals have been able to experiment with improved interfaces for digital information and alternate preservation strategies because federal documents do not carry a copyright label.
4. **Archival Preservation.** Geographic distribution of government information through the Federal Depository Library Program and regional offices of the National Archives has ensured long-term availability despite natural disaster, fire, and terrorism.

In an electronic era, the threat to long-term preservation is technological change. The Department of Energy's 5-1/4 floppy disks, distributed over a decade ago, cannot be read by current equipment. Magnetic tapes of the 1970 Census have suffered a similar fate. Portions of the 1990 Census distributed only on CD-ROM are close to extinction. We simply do not know whether information distributed in 2002 in *html* or *pdf* format will be usable twenty years from now.

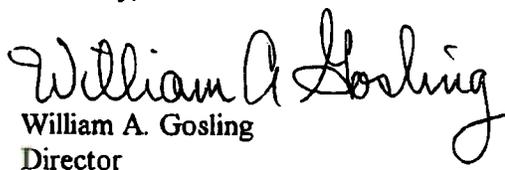
Laurie Duarte
General Services Administration
November 27, 2002
Page 3

011-252

Therefore, we suggest that the Executive Branch agencies, in conjunction with the Office of Management and Budget, National Archives, libraries, and scholars make a dedicated effort to determine which publications should be distributed to depository libraries in paper format, a venue which will be legible far into the future.

Lastly, the Government Printing Office produces high quality products, regardless of any flaws in its operations. Its publications are durable, well composed, easy-to-read, and visually pleasing. The GPO is committed to the Federal Depository Library Program. We wish it well in a new era of competition.

Sincerely,


William A. Gosling
Director

WAG/bak



"carol wahrer"
<cwahrer@attbi.com>
11/28/2002 03:18 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

2002-011-253

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

carol wahrer
544 nightingale
Livermore, CA 94551
USA



"Derk Gates"
<derk@DerkGates.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:27 PM

011-254

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Derk Gates
307 N Grant St
Lebanon, IN 46052
USA



"Rick Potthoff"
<strangefriend@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:27 PM

011-255

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Rick Potthoff
1814 Pine Village
Houston, TX 77080
USA



"Abtin Shakouri"
<AbtinsHakouri@adelp
hia.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 03:56 PM

011-256

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Abtin Shakouri
1016 Centinela ave
Santa Monica, CA 90403
USA



"Jeffry Friedt"
<woodyfriedt@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 04:01 PM

011-257

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeffry Friedt
1053 Winchester St
Decatur, IN 46733
USA



"David Diamond"
<superdude69_us@ms
n.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 04:31 PM

011-258

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Diamond
26 Cobblestone Way W
Mobile, AL 36608
USA



"Curtis Sahakian"
<cpart@partneringagreements.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 04:37 PM

011-259

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Curtis Sahakian
4843 Howard Street
Skokie, IL 60077
USA



"Ryan Maxwell"
<maxwell@echowave.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 04:39 PM

011-260

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ryan Maxwell
18761 Haven Lane
Yorba Linda, CA 92886
USA



"Klaus Schreyack"
<kpschrey@ouray.cudenver.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 04:51 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-261

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Klaus Schreyack
15371 E Ford Pl #D3
Aurora, CO 80017
USA

011-262



"Alessandro Abate"
<sandro@mac.com>
11/29/2002 11:44 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Alessandro Abate
1291 Nightingale Ave
Miami Springs, FL 33166
USA



"Jeremiah Cornelius"
<jcorneli@hotmail.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 05:00 PM

011-263

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeremiah Cornelius
2 N. Mayfair Ave.
Daly City, CA 94015
USA



"Anthony Cavanaugh"
<PitViper401@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 05:03 PM

011-264

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Anthony Cavanaugh
1501 Cumberland Pkwy.
Algonquin, IL 60102
USA



"BC Petery"
<bpetery@yahoo.com>
11/28/2002 05:09 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-265

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

BC Petery
27 Marcel Ave
Spring City, PA 19475
USA



"Brent Garber"
<overlord_q@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 05:15 PM

811-266

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Brent Garber
439 E Sherman
Hutchinson, KS 67501
USA



"Shel Ceresnie"
<lepton1@comcast.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 05:20 PM

011-267

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Shel Ceresnie
14221 kingston
Oak Park, MI 48237
USA



"Jason Duell"
<jduell@alumni.princeton.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 05:59 PM

011-268

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jason Duell
1612 Walnut Street #2N
Berkeley, CA 94709
USA



"D.J. Capelis"
<djcapelis@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 06:00 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

D.J. Capelis
PO Box 374
Graton, CA 95444
USA

011-269



"Gabriella Turek"
<gaby@dv8.net>

11/28/2002 06:13 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-270

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gabriella Turek
112 N Michigan Ave #12
Pasadena, CA 91106
USA



"Charles Webb"
<bmallice@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 06:17 PM

011-271

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Charles Webb
513 NW Barbara Ln.
Burleson, TX 76028
USA



"Tim Kubista"
<usunoro@myrealbox.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 06:31 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Tim Kubista
5627 Columbia Rd
APT# 101
Columbia, MD 21044
USA

011-272



"Greg Trouw"
<finortis@speakeasy.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 06:32 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Greg Trouw
3100 Jane Place NE
Appt I-103
Albuquerque, NM 87111
USA

011-273



"Lyen Huang"
<lyenh@stanfordalumn
i.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 06:39 PM

011-274

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Lyen Huang
2293 Princeton Street
Palo Alto, CA 94306
USA



"Michael Edwards"
<graconmightymonk@
hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 06:42 PM

011-275

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Edwards
717 Peace Rd
Carthage, NC 28327
USA



"Ali Saidi"
<asaidi@mail.utexas.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 06:45 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-276

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ali Saidi
3006 Speedway St. Apt D
Austin, TX 78705
USA



"John Elder"
<john@jelder.com>
11/28/2002 06:51 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-277

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Elder
754 Sheldon St.
El Segundo, CA 90245
USA



"Jason Sloderbeck"
<jasonsloderbeck@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:01 PM

011-278

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jason Sloderbeck
15508 Glenwood St
Overland Park, KS 66223
USA



"Albert Bassetti"
<ajb5@aol.com>

11/29/2002 11:48 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-279

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Albert Bassetti
P.O. Box 303
Phillipsburg, NJ 08865
USA



"Kenna Feeney"
<kfeeney@bigfoot.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:05 PM

011-280

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kenna Feeney
73 Mill Rd
Stamford, CT 06903
USA



"James Reaume Jr"
<drmike@chartermi.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:10 PM

011-281

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

James Reaume Jr
316 Davis Court
Ionia, MI 48846
USA



"David Magnuson"
<tonymag@attbi.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:13 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

David Magnuson
2008 Vallemar Street
Moss Beach, CA 94038
USA

811-282



"john nichols"
<john.nichols.1969@al
um.bu.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:13 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

john nichols
pmb 312, 1945 N. Carson St.
carson city, NV 89701
USA

011-283



"Robert Gregg
Mitchell"
<r.mit@verizon.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:13 PM

011-284

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Robert Gregg Mitchell
6 Marjorie Dr
Saratoga Springs, NY 12866
USA



"Jonathan Blaine"
<jonathanblaine@marc
om-resources.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:20 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-285

Dear FAR Board ,

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Sincerely,

Jonathan Blaine
865 Bellevue Rd Apt B18
Nashville, TN 37221
USA



"Robert Cox"
<cox12138@earthlink.
net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:25 PM

011-286

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Robert Cox
12138 N Sherman Lake Dr
Augusta, MI 49012
USA



"James Caruso"
<jim@jimcaruso.com>
11/28/2002 07:26 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-287

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

James Caruso
415 State Street
Roswell, GA 30075
USA



"Thomas Russell"
<puddin@tmbg.org>
11/28/2002 07:28 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-288

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Thomas Russell
3014 W. William Cannon
#232
Austin, TX 78745
USA



"David Taylor"
<davidgtaylor@email.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:29 PM

011-289

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Taylor
4520 Eldorado Dr
Gardendale, AL 35071
USA



"Carrie Smith"
<csmith0406@spamco
p.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:54 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Carrie Smith
200 Falls Blvd Apt E301
Quincy, MA 02169
USA

011-290



"Jim Wang"
<jwang@springmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 07:58 PM

011-291

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jim Wang
10545 Johnson Ave
Cupertino, CA 95014
USA



"Clark Tenney"
<cbt@raex.com>

11/28/2002 08:05 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-292

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Clark Tenney
RR 2 Box 352
New Cumberland, WV 26047
USA



"Dale Hill"
<drivenman@comtek.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:12 PM

011-293

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Dale Hill
924 West 11th Street
Marion, IN 46953
USA



"Mark Woon"
<unkyaku@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:17 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Mark Woon
3259 Benton St
Santa Clara, CA 95051
USA

011-294



"Jared Ford"
<lookatpotter@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:19 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jared Ford
54 Manor Road
Penacook, NH 03303
USA

011-295

2



"Jacqueline M. Fralley"
<geofral@att.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:27 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-296

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jacqueline M. Fralley
15101 Interlachen Dr Apt 826
Silver Spring, MD 20906
USA



"Suzanne Glass"
<sglass@ghp.net>

11/28/2002 08:32 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-297

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Suzanne Glass
PO Box 602
Columbus, IN 47202
USA



"Nick Lavelly"
<nick@starrdust.net>
11/28/2002 08:33 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-298

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Nick Lavelly
15601 Foliage Ave
Apt. 439
Apple Valley, MN 55124
USA



"Patrick Hoban"
<patrickhoban@cox.net>
t>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:37 PM

011-299

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Patrick Hoban
8920 NW 85th PL
Oklahoma City, OK 73132
USA



"Benjamin Anderson"
<xylene@earthlink.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:39 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Benjamin Anderson
208 Marshall Ter
Danville, VA 24541
USA

011-300



"Terrence Comella"
<tecomella@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:48 PM

011-301

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Terrence Comella
6200 Tyner St
Springfield, VA 22152
USA



"Curtis Hawthorne"
<cghawthorne@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 08:49 PM

011-302

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Curtis Hawthorne
7707 N. Monroe
Hutchinson, KS 67502
USA



"Caleb Ciampaglia"
<ccciampaglia@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:05 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Caleb Ciampaglia
300 W 55th St
Apt. 8-R
New York, NY 10019
USA

011-303



"joe rowlands"
<doughb82@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:05 PM

011-304

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

joe rowlands
2693 petes lane
Boonville, NY 13309
USA



"Larry mayer"
<larry1748@aol.com>
11/28/2002 09:12 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-305

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Larry mayer
17 Lindenwood road
Staten Island, NY 10308
USA



"David Rogers"
<derogers@bigfoot.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:15 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

David Rogers
1535 Hazelwood Ave
Los Angeles, CA 90041
USA

011-306



"Cliff Williamson"
<radioantarctica@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:18 PM

011-307

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Cliff Williamson
702 Crompton Ct
Saint Louis, MO 63126
USA



"Matthias Johnson"
<matthiasjbg@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:30 PM

011-308

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Matthias Johnson
10018 King Street
Westminster, CO 80031
USA



"paul impola"
<paulimpola@hotmail.com>

11/28/2002 09:40 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-309

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

paul impola
18 spring street
Hudson Falls, NY 12839
USA



"Ross Alexander"
<ross@two-cats.net>
11/28/2002 09:41 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-310

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ross Alexander
29 Carsam Street
Fanwood, NJ 07023
USA



"Alison Becker"
<alisonabecker@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:44 PM

011-311

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Alison Becker
6009 Saturn St
Los Angeles, CA 90035
USA



"Anthony O'Neil"
<snerto@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 09:52 PM

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-312

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Anthony O'Neil
2939 S Lakeshore Rd
Harbor Beach, MI 48441
USA



"Charles Wiese"
<cwiese3@attbi.com>
11/28/2002 10:11 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-313

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Charles Wiese
6293 Yank Ct.
Arvada, CO 80004
USA



"S. Steriti"
<pet_psychic@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:13 PM

011-314

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

S. Steriti
36B-15 Gibbs St
Ballard Woods
Worcester, MA 01607
USA



"Jeff Burton"
<burton31@chartermi.net>

11/28/2002 10:17 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-315

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jeff Burton
3733 E. Long Lake Rd.
Traverse City, MI 49684
USA



"James Macy"
<jrmacy@hotmail.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:19 PM

011-316

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

James Macy
PO Box 303
Oak Bluffs, MA 02557
USA



"Brent Johnson"
<xfool17@hotmail.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:20 PM

011-317

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Brent Johnson
161 Mutter Lane
Pearisburg, VA 24134
USA



"Debra Pruett"
<dpruett@CocoaVillag
ePublishing.com>

11/28/2002 10:28 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-318

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Debra Pruett
415 Brevard Ave
Cocoa, FL 32922
USA



"Michael Keller"
<green@null.net>

11/28/2002 10:33 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Keller
1911 W. Easton Pl.
Tulsa, OK 74127
USA

011-319



"Kyle Stratis"
<pillar918@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:43 PM

011-320

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kyle Stratis
77 St. Mark Trail
Yulee, FL 32097
USA



"John T. Powers Jr."
<jack@cryptnet.org>
11/28/2002 10:44 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-321

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

John T. Powers Jr.
605 Encino Drive
Morgan Hill, CA 95037
USA



"Grady Joslin"
<g.joslin@insightbb.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:44 PM

011-322

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Grady Joslin
3522 Stenger Lane
Jeffersonville, IN 47130
USA



"Steve Kirkbride"
<stevekirkbride@wi.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:49 PM

011-323

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Steve Kirkbride
1600 Murray Ave
Waukesha, WI 53186
USA



"Jimmy Teegarden"
<jcteegarden@starband.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 10:53 PM

011-324

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jimmy Teegarden
9020 36th St SE
Snohomish, WA 98290
USA



"kyle marshall"
<marshalkf@juno.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:01 PM

611-325

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

kyle marshall
891 Winterhaven Dr
Gambrills, MD 21054
USA



"Christopher Kohan"
<topheratl@mindspring.com>

11/28/2002 11:10 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-326

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Christopher Kohan
2125 Defoors Ferry Rd NW Apt E11
Atlanta, GA 30318
USA



"Francis Bunker
Parker"
<lilbambi@pop4.net>

11/28/2002 11:13 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-327

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Francis Bunker Parker
244 Liberty Street
PO Box 338
Dendron, VA 23839
USA



"Keith Wissing"
<hitiek@ptd.net>

11/28/2002 11:19 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-328

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Keith Wissing
107 E 6th St
Lititz, PA 17543
USA



"Nathan
Wardrip-Fruin"
<nathan@cat.nyu.edu>

11/28/2002 11:27 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-329

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Nathan Wardrip-Fruin
752 greenwich st. #4b
New York, NY 10014
USA



"Garth Payne"
<garthpayne@ispwest.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:29 PM

011-330

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Garth Payne
PO BOX 573
Middleburg, VA 20118
USA



"Thomas Ditmars"
<ditmarst@enter.net>
11/28/2002 11:30 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-331

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Thomas Ditmars
151 Blenheim Dr.
Easton, PA 18045
USA



"Jim Clark Clark"
<robroy43_2000@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:36 PM

011-332

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jim Clark Clark
4648 Pontchartrain Drive-Unit I
Slidell, LA 70458
USA



"portia mottola"
<portiamot@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:37 PM

011-333

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

portia mottola
1409 Waterloo ST
Los Angeles, CA 90026
USA



"James Dolliver"
<bdolliv1@twcny.rr.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:57 PM

011-334

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

James Dolliver
405 Fay Ln
Minoa, NY 13116
USA



"Robert Stephenson"
<rstephe@sun.science
.wayne.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/28/2002 11:59 PM

011-335

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Stephenson
1430 Jackson St
San Francisco, CA 94109
USA



"Menachem Green"
<m2g21@mindspring.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 12:07 AM

011-336

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Menachem Green
1742 S. Wooster St.
Los Angeles, CA 90035
USA



"Joseph Hill"
<vulturejoe@yahoo.co
m>

11/29/2002 12:08 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-337

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Joseph Hill
5851 Barry Ave
Anchorage, AK 99507
USA



"Gerald Stafford"
<popajerry@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 12:24 AM

011-338

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gerald Stafford
2700 W. 14th Place
Yuma, AZ 85364
USA



"Henry Ketter"
<HDKorp@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 12:24 AM

011-339

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Henry Ketter
4725 Oakridge Ave
Oak Forest, IL 60452
USA



"Carlos Averett"
<cyt0plas@endlessdep
th.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 12:27 AM

011-340

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Carlos Averett
333 E. Bridgeport Pkwy.
Gilbert, AZ 85296
USA



"Derek Cheney"
<Dartalf@aol.com>
11/29/2002 12:30 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-341

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Derek Cheney
8361 154th Ave NW
Ramsey, MN 55303
USA



"David Freyberger"
<David@IRSTransport.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 12:38 AM

011-342

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Freyberger
2647 30th ave n
Saint Petersburg, FL 33713
USA



"Jorge Escala"
<amdg@mac.com>
11/29/2002 01:12 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-343

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jorge Escala
18105 SW 145 Ave
Miami, FL 33177
USA



"William F. BAILEY"
<tesseract@concentric.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 01:18 AM

011-344

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

William F. BAILEY
1009 Las Palmas Drive
Santa Clara, CA 95051
USA



"Kyle Ritchie"
<gameboy2031@itook
myprozac.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 01:18 AM

011-345

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Kyle Ritchie
30980 Red Mountain Rd
Hemet, CA 92544
USA



"Roger Hackett"
<rahackett@cox.net>
11/29/2002 01:39 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-346

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Roger Hackett
1033 Cambronne St
New Orleans, LA 70118
USA



"Scott Walters"
<scott@illogics.org>
11/29/2002 01:43 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-347

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Scott Walters
PO Box 692
Tempe, AZ 85280
USA



"Jason Reich"
<jreich@san.rr.com>
11/29/2002 01:50 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-348

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jason Reich
7628 Parma Lane
San Diego, CA 92126
USA



"Andrew Casper"
<andrew@casper.net>
11/29/2002 02:01 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-349

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Andrew Casper
333 E 30th St
Apartment 7P
New York, NY 10016
USA



"Andrew G.
Katsnaevas"
<akatsnaevas@yahoo.
com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 02:21 AM

011-350

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Andrew G. Katsnaevas
6957 South Dixie Drive
West Jordan, UT 84084
USA



"Edward Robins"
<erobins@ucsc.edu>
11/29/2002 02:28 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-351

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Edward Robins
600 Kresge Court
University of California
Santa Cruz, CA 95064
USA



"David Huseth"
<huseth@att.net>

11/29/2002 02:35 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-352

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Huseth
394 W 2nd St
Elmhurst, IL 60126
USA



"Gary Ray"
<grray@bariaur.com>
11/29/2002 02:50 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-353

November 28, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gary Ray
765 Mesa Way
Richmond, CA 94805
USA



"Gary Ward"
<gary@greytower.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 03:26 AM

011-354

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gary Ward
441 Pin Oak Drive
Sunnyvale, CA 94086
USA



"Max Hunger"
<m.hunger@attbi.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 03:27 AM

011-355

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Max Hunger
225 NE Hyde Circle
Hillsboro, OR 97124
USA



"Devin Tolcou"
<dttolcou@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 03:33 AM

011-356

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Devin Tolcou
300 Wynstay Ave
Valley Park, MO 63088
USA



"John Christgau"
<jec@thecastle.com>
11/29/2002 03:55 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-357

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

John Christgau
7 Lauren Ave.
Novato, CA 94947
USA



"mike simmons"
<onmars@attbi.com>
11/29/2002 04:03 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-358

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

mike simmons
2494 purdue ave
5
Los Angeles, CA 90064
USA



"David Stephenson"
<hitman811@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 04:16 AM

011-359

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Stephenson
2209 Washington Ave
Huntington, WV 25704
USA



"William Lewis"
<blewis@gorge.net>
11/29/2002 04:25 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-360

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

William Lewis
132 Vine Maple Loop
Carson, WA 98610
USA



"Eugene Vasserman"
<eugene_v@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 04:28 AM

011-361

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Eugene Vasserman
1009 W. 26th St.
Minneapolis, MN 55405
USA



"Geoffrey Peck"
<geoff@peck.com>
11/29/2002 04:31 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-362

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Geoffrey Peck
3075 Marston Way
San Jose, CA 95148
USA



"Kevin Mess"
<kmess@lvcm.com>
11/29/2002 04:54 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-363

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Kevin Mess
1685 Long Horizon Ln
Henderson, NV 89074
USA



"david bennoch"
<dbennoch@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 05:20 AM

011-364

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

david bennoch
30 juniper road apt 29
North Attleboro, MA 02760
USA



"Michael Cox"
<michaeldavidcox@adelphia.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 05:31 AM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Michael Cox
843 Revelstore Terrace NE
Leesburg, VA 20176
USA

011-365



"Debbie Zwaan"
<debbie.zwaan@uba.u
va.nl>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 06:38 AM

011-366

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Debbie Zwaan
Dokter Pinxsterplantsoen 45
Wervershoof, 1693 EW
Netherlands



"Joseph Wise"
<wise2001@optonline.
net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 06:52 AM

011-367

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joseph Wise
162 Smithfield Court
Basking Ridge, NJ 07920
USA



"Al Zoda"
<alzoda@attbi.com>
11/29/2002 08:00 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-368

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Al Zoda
1470 Evergreen Ln
Salt Lake City, UT 84106
USA



"David W. Hines"
<dave@n2lak.com>
11/29/2002 08:24 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-369

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

David W. Hines
1982 Waltoffer Ave
North Bellmore, NY 11710
USA



"greg whorley"
<greg@whorley.com>
11/29/2002 08:27 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-370

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

greg whorley
8030 cedar cove
Roswell, GA 30075
USA



"Joshua Smeltser"
<skinny@rocketmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 08:28 AM

011-371

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joshua Smeltser
407 East Warren St.
Mount Pleasant, IA 52641
USA



"Michael Murphy"
<dvoyy@yahoo.com>
11/29/2002 08:46 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-372

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Michael Murphy
488 Jenny Lane
Danville, VA 24541
USA



"Jeffery White"
<white@planet-save.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 08:51 AM

011-373

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeffery White
3416 Feather Reed Ave
Longmont, CO 80503
USA



"Steven Kohler"
<skohler@arcadis-us.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 08:51 AM

011-374

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Steven Kohler
21450 Frazer Ave
Southfield, MI 48075
USA



"Mike Long"
<longmoto@presente
r.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 08:54 AM

011-375

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Mike Long
1175 Rolling Hills Trl
Hudson, WI 54016
USA



"Paul Davis"
<pauldavis@coloradon.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 09:05 AM

011-376

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Paul Davis
4545 Wheaton Dr. #G120
Fort Collins, CO 80525
USA



"Michael Spadea"
<MSpadea@galaxy.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 09:05 AM

011-377

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Spadea
19 Pallas Street
Apt. 2
Providence, RI 02903
USA



"Justin Alfaro"
<Pointzenith85@aol.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 09:21 AM

011-378

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Justin Alfaro
1318 Old England Loop
Sanford, FL 32771
USA



"Hesky Fisher"
<hfisher@mit.edu>
11/29/2002 09:25 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-379

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Hesky Fisher
206 Scott St.
Baltimore, MD 21230
USA



"Baba Kofi Weusijana"
<kofi@edutek.net>

11/29/2002 09:31 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-380

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Baba Kofi Weusijana
10265 Parkwood Dr. #7
Cupertino, CA 95014
USA



"Stephen Drozdick"
<drozdickk@aquatech.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 09:32 AM

011-381

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Stephen Drozdick
5634 Timberhurst
San Antonio, TX 78250
USA



"Douglas Buchanan"
<darkwave@tir.com>
11/29/2002 09:38 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-382

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Douglas Buchanan
17387 Hickory Ridge Rd.
Fenton, MI 48430
USA



"Jared Kaufman"
<shinchan@parasol.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 09:53 AM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-383

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jared Kaufman
309 S Prairie St
Champaign, IL 61820
USA



"Peter Suber"
<peters@earlham.edu>
11/29/2002 09:53 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-384

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Peter Suber
Dept of Philosophy, Earlham College
Richmond, IN 47374
USA



"Burwood McFarland"
<burwood@mac.com>
11/29/2002 09:54 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

01-385

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Burwood McFarland
1149 Maple Ave
Evanston, IL 60202
USA



"Mark Weindling"
<markw@anomalous.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 10:03 AM

011-386

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Mark Weindling
316 Franklin
Barrington, IL 60010
USA



"Lyle Tagawa"
<lyle_tagawa@fourlev
en.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 10:08 AM

011-387

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Lyle Tagawa
570 Manville Road
Pleasantville, NY 10570
USA



"Paul Warwick"
<Pwarwick@cfl.rr.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 10:08 AM

011-388

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Paul Warwick
7903 Sagebrush Pl.
Orlando, FL 32822
USA



"Joseph St. Pierre"
<jstp@tampabay.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 10:36 AM

011-389

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joseph St. Pierre
1020 23rd Av. N.
St. Petersburg, FL 33704
USA



"Daniel Schell"
<mrman2908@mindspring.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 10:36 AM

011-390

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Daniel Schell
141 S Bates St Apt 12
Saginaw, MI 48602
USA



"Victor Aelion"
<vaelion@pacbell.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 10:42 AM

011-391

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Victor Aelion
60 Camellia Pl.
Oakland, CA 94602
USA



"John Sitnik"
<sitnik@bccls.org>
11/29/2002 10:43 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-392

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Sitnik
Glen Ridge Public Library
240 Ridgewood Avenue
Glen Ridge, NJ 07028
USA



"Keith Hannah"
<keithhannah@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 10:53 AM

0 11-393

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Keith Hannah
607 N. Alameda Ave.
Muncie, IN 47303
USA



"Ellen Podolsky"
<epodolsky@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 11:01 AM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ellen Podolsky
33 Magoun Ave Apt 2
Medford, MA 02155
USA

011-394



"Randen Pederson"
<chefranden@charter.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 11:11 AM

011-395

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Randen Pederson
1502 E 3rd St
Superior, WI 54880
USA



"Jared Dufour"
<jared@exodusnet.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 11:23 AM

011-396

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jared Dufour
684 Coachlight Dr.
Fern Park, FL 32730
USA



"david platt"
<dplatt@twmi.rr.com>
11/29/2002 11:26 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-397

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

david platt
24724 Roosevelt Ct Apt 310
Infrpendence Green Apts
Farmington Hills, MI 48335
USA



"Chris Christianson"
<chrischristianson@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 11:31 AM

011-398

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Chris Christianson
2614 South Bay Drive
Fargo, ND 58103
USA



"Walter Szewelanczyk"
<walter@mwsewall.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 11:41 AM

011-399

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Walter Szewelanczyk
90 Ward Rd
Topsham, ME 04086
USA



"Andrew Frankel"
<PrometheusPi@myre
albox.com>

11/29/2002 11:48 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: | Oppose FAR Case 2002-011

011-400

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Andrew Frankel
230 Bartholf Ave
Pompton Lakes, NJ 07442
USA



"Joseph Pate"
<josephpate@earthlink
.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 12:15 PM

2002-011-401

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joseph Pate
12638 Braswell drive
Mc Calla, AL 35111
USA



"Jonathan Sailor"
<jesboat@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 05:55 PM

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Jonathan Sailor
234 Slade St
Belmont, MA 02478
USA

2002-011-402



"John Oakley"
<tigerdragonclaw@aol.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 03:19 PM

011-403

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Oakley
16413 Nation Rd
Kearney, MO 64060
USA



"Kevin Jarnot"
<eff@jarnot.com>

11/29/2002 12:22 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-404

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kevin Jarnot
10 Black Beech Ln
Scituate, MA 02066
USA



"Joseph Calistro"
<calistro@optonline.net>
t>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 12:24 PM

011-405

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joseph Calistro
209 Mellon Pl
Elizabeth, NJ 07208
USA



"Michael Attili"
<attili@amaxo.com>
11/29/2002 12:29 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-406

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Attili
9 Wildwood Drive
Newburyport, MA 01950
USA



"Amy Kearns"
<Kearns@palsplus.org
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 12:34 PM

011-409

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I am leery that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Amy Kearns
21 Forest Road
Glen Rock, NJ 07452
USA



"Joe Medina"
<joemedina@attbi.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 12:46 PM

011-408

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joe Medina
19792 SW Ashcroft Ln
Aloha, OR 97006
USA



"Valdemar Johnson"
<vjohnson@titan.com>
11/29/2002 12:52 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-409

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Valdemar Johnson
Suite 300, 13135 Lee Jackson Hwy
Fairfax, VA 22033
USA



"Jesse Emry"
<jgemry@hotmail.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 01:00 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-410

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jesse Emry
154 Beaverdam Rd Apt 1
Asheville, NC 28804
USA



"Nelson Abramson"
<pogtal@erols.com>
11/29/2002 01:09 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-411

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Nelson Abramson
3622 Jocelyn St NW
Washington, DC 20015
USA



"Casey Muratori"
<cmu@funky troll.com>
11/29/2002 01:12 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-412

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Casey Muratori
11509 NE 107th Place
Kirkland, WA 98033
USA



"George Maslyar"
<gmaslyar@tidalwave.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 01:17 PM

011-413

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

George Maslyar
P.O. Box 269
Kensington, MD 20895
USA



"Benjamin Johnson"
<benj@visi.com>

11/29/2002 01:21 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-414

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Benjamin Johnson
965 Sprucewood Dr
Woodbury, MN 55125
USA



"Elizabeth Moreno"
<1elm@attbi.com>
11/29/2002 01:21 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-415

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Elizabeth Moreno
225 Avery Lane, #19
Los Gatos, CA 95032
USA



"Lancia Speed"
<lanciaspeed@juno.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 01:24 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Lancia Speed
5045 South Yakima Avenue
Tacoma, WA 98408
USA

011-416



"William Campbell"
<Bilsybub@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 01:38 PM

011-417

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

William Campbell
2504 Huntwick Dr. #303
Austin, TX 78741
USA



"Mark Allen Adams,
Jr."
<adamsma@washjeff.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 01:53 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Mark Allen Adams, Jr.
353A E. Wheeling St.
Washington, PA 15301
USA

011-418



"Dave Lundgren"
<draxon@hawaiian.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 02:06 PM

011-419

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Dave Lundgren
4434 Kai Ikena Drive
Kalaheo, HI 96741
USA



"John Vaughn"
<johnvaughn@yours.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 02:07 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-420

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Vaughn
25838 Richard Rd
Spring, TX 77386
USA



"John Klopp"
<jrock321@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 02:08 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-421

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Klopp
541 Grand Royal Cir
Winter Garden, FL 34787
USA



"d simon"
<dsimon320@bigfoot.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 03:12 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-422

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

d simon
1739 e carson st
apt 116
Pittsburgh, PA 15203
USA



"Steven Usdansky"
<usdanskys@rocketmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 03:19 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-423

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Steven Usdansky
305 2nd St NW
Faribault, MN 55021
USA



"Peter Weyman"
<pjweyman@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 03:27 PM

0 11 4/24

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal to make changes to the Federal Acquisition Regulation regarding the procurement of printing and duplicating through the Government Printing Office (GPO).

Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination of documents from US government agencies.

According to GPO estimates, many agencies fail to deliver electronic copies of their documents. Currently, the GPO manages the majority of government printing, is solely responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation, and puts much of this material on the Internet.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of small business private contractors throughout the nation, acting as a clearinghouse for printing. Further, decentralizing this organizational layer will not cut costs -- it will likely increase them, due to duplication of printing procurement effort and resources in multiple agencies.

Finally, I urge you to respect Congress' fifth and most recent resolution regarding the GPO, HJ Res 122 (Public Law 107-294), which condemns this measure.

Thank you for your consideration of my views on this important issue.

Sincerely,

Peter Weyman
500 Angell Street
Apartment 615
Providence, RI 02906
USA



"K. Skelding"
<k5w4b8ps@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 03:32 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-425

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

K. Skelding
15610 Four Leaf Dr
Houston, TX 77084
USA



"K DANOWSKI"
<SILVER_KD@YAHOO.COM>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 03:44 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-426

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

K DANOWSKI
122 VAIL
Midland, MI 48642
USA



"Ben Munat"
<bent@munat.com>
11/29/2002 03:51 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-427

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ben Munat
2519 4th Ave E
Olympia, WA 98506
USA



"Brent Hayton"
<integrity_comp@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 03:51 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Brent Hayton
12566 N Smith Ave
Rathdrum, ID 83858
USA

011-428



"Christopher Kelly"
<activism@morayreef.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 04:14 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-429

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Christopher Kelly
1335 El Camino Real
#307
Burlingame, CA 94010
USA



"Borne
Goodman-Mace"
<bjgm@penguinfury.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 04:36 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-430

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Borne Goodman-Mace
377 Wilson Rd
Johnson, VT 05656
USA



"Timur Tabi"
<timur@tabi.org>

11/29/2002 04:50 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-431

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Timur Tabi
10605 Jonwood Way
Austin, TX 78753
USA



"Bryan Dunnington"
<ddunnington@ameritech.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 04:55 PM

011-432

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Bryan Dunnington
3652 W Hilltop Ln
Franklin, WI 53132
USA



"Robert Van Cleef"
<vancleef@garg.com>

11/29/2002 05:14 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-433

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Robert Van Cleef
54 N. 33rd Street
San Jose, CA 95116
USA



"Allen McDow"
<amcd@concentric.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 05:18 PM

011-434

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Allen McDow
115-86 218 St.
Cambria Heights, NY 11411
USA



"Eric Wollesen"
<ericw@xmtp.net>

11/29/2002 05:25 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Eric Wollesen
42355 Joyce Ln
Novi, MI 48377
USA

011-435



"Barry Weikle"
<bweikle78@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 05:42 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-436

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Barry Weikle
2112 Short St
Fort Wayne, IN 46808
USA



"Albin Jones"
<albin.jones@comcast.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 05:46 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-437

Dear FAR Board ,

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Sincerely,

Albin Jones
8015 Laketowne Ct.
Severn, MD 21144
USA



"Brendan Howes"
<zeio@hotmail.com>
11/29/2002 05:49 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-438

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Brendan Howes
20 Duane St. Apt.1
Redwood City, CA 94062
USA



"James Sims"
<jim.sims@snet.net>
11/29/2002 06:16 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-439

Dear FAR Board ,

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Sincerely,

James Sims
21 Carey Lane
Norwich, CT 06360
USA



"George Nimmer"
<george164@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 06:18 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-440

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

George Nimmer
1035 Dulaney Mill Drive
Frederick, MD 21702
USA



"John Boyd"
<johnboyd@ou.edu>
11/29/2002 06:34 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-441

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Boyd
519 S. University Blvd. Apt.#31
Norman, OK 73069
USA



"William Blair"
<wbblair3@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 06:37 PM

011-442

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

William Blair
2265 Willow Tree Grove #204
Colorado Springs, CO 80910
USA



"steve dale"
<sdnsg@yahoo.com>
11/29/2002 06:58 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-443

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

steve dale
2200 forest lake court
Eureka, CA 95501
USA



"Tom Perez"
<tomperetz@znet.com>
11/29/2002 07:06 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-444

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Tom Perez
2937 Barrington Terrace
Fremont, CA 94536
USA



"Shawn Kinzel"
<eff@cubezoo.com>
11/29/2002 07:11 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-445

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Shawn Kinzel
397 Burgess St
Saint Paul, MN 55117
USA



"HJ Brandon"
<branco2@attbi.com>
11/29/2002 07:20 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-446

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

HJ Brandon
309 Wista Vista
Richardson, TX 75081
USA



"Nate Monroe"
<natemonroe@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 07:43 PM

011-447

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Nate Monroe
28 Sedillo Rd
Tijeras, NM 87059
USA



"Clifton Hyatt"
<clifh@midtec.org>
11/29/2002 07:44 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-448

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Clifton Hyatt
415 N. Hanley
Saint Louis, MO 63130
USA



"Carrie Barclay"
<cckb@big.net>

11/29/2002 07:50 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-449

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Carrie Barclay
2287 Bryant St.
San Francisco, CA 94110
USA



"Matthew Mactyre"
<mcm@mactyre.net>
11/29/2002 08:01 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-450

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Matthew Mactyre
960 NW 229th Ave
Hillsboro, OR 97124
USA



"Kenneth Kleinfelter
III"
<drod@swirve.com>
11/29/2002 08:04 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-451

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kenneth Kleinfelter III
10053 Oso Ave
Chatsworth, CA 91311
USA



"Jeffrey Mangers"
<Mangersj@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 08:09 PM

011 - 452

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeffrey Mangers
6870 N 77th St
Scottsdale, AZ 85250
USA



"David Streip"
<computergeek3076@
cableone.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 08:33 PM

011-453

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Streip
1419 Beck Rd.
Eastaboga, AL 36260
USA



"Claudius Stute"
<claudiusstute@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 09:34 PM

011-454

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Claudius Stute
21263 Thatcher Terr.
Apt. 301
Ashburn, VA 20147
USA



"Allan Snider"
<ajsnider@toast.net>
11/29/2002 10:21 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-455

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Allan Snider
113 Whispering Woods Rd.
Charleston, WV 25304
USA



"Beth Senturia"
<toowyld@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 10:33 PM

011-456

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Beth Senturia
437 W 36th St.
#2B
New York, NY 10018
USA



"Kerry Carskadon"
<kerrycarskadon@mch
si.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/29/2002 10:35 PM

011-457

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Kerry Carskadon
772 N Pleasant Hill Blvd Apt 45
Pleasant Hill, IA 50327
USA



"Theresa Irwin"
<tirwin56@vol.com>
11/29/2002 10:39 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-458

Dear FAR Board ,

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Sincerely,

Theresa Irwin
357 Sunnyside Rd
Sweetwater, TN 37874
USA



"Michael Woodson"
<mike@staticnet.net>
11/29/2002 10:47 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-059

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Woodson
1566 Rosewood Terrace Dr
Manchester, MO 63021
USA



"Jeff Annis"
<JeffAnnis@Realtor.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 10:55 PM

011-460

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeff Annis
5291 Goddard Rd
Bethesda, MD 20814
USA



"John Amaral"
<johnamaral@celarix.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 10:56 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-461

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Amaral
27 E Foster St
Melrose, MA 02176
USA



"Jeff Hinrichs"
<jlh@cox.net>

11/29/2002 11:08 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-462

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeff Hinrichs
2009 N 50th St
Omaha, NE 68104
USA



"Greg Filak"
<eff@engineergreg.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 11:28 PM

811-463

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Greg Filak
118 W North St
Carlisle, PA 17013
USA



"Elizabeth Asquini"
<asquini@kua.net>
11/29/2002 11:43 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011 - 464

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Elizabeth Asquini
1009 Royal St
Kissimmee, FL 34744
USA



"Thomas DeRoy"
<cowpolktd@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 11:45 PM

011-465

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Thomas DeRoy
2003 Fort Worth ST
Rockport, TX 78382
USA



"Aravind Mikkilineni"
<amikkili@purdue.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/29/2002 11:46 PM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Aravind Mikkilineni
551 Stedway Ct.
Gahanna, OH 43230
USA

011-466



"Mark DeHaven"
<mdehaven1@insightb
b.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/29/2002 11:49 PM

011-467

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Mark DeHaven
3310 Redbud Ct
Westfield, IN 46074
USA



"Edward Childress"
<eddiec@hotpop.com>
11/30/2002 12:17 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-468

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Edward Childress
1071 Clayton Ln. #412
Austin, TX 78723
USA



"Alfred Blitzer"
<ablitzer@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 12:21 AM

011-469

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Alfred Blitzer
21 East 10th Street
New York, NY 10003
USA



"Paul Staszko"
<staszko@cableone.net>
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 12:57 AM

011-470

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Paul Staszko
1109 14th St N
Moorhead, MN 56560
USA



"David Menke"
<dmenke@wi.rr.com>
11/30/2002 12:59 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-471

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Menke
8011 216th Ave.
Bristol, WI 53104
USA



"Keith Barber"
<keithbarber@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/30/2002 01:50 AM

011-472

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Keith Barber
3135 Park Ave
Minneapolis, MN 55407
USA



"Daryl Straszheim"
<daryl_straszheim@bi
gfoot.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 02:11 AM

011-473

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Daryl Straszheim
756 E Cantebria Dr
Gilbert, AZ 85296
USA



"Jared Lueck"
<moss84@nv.freei.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 02:17 AM

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jared Lueck
1307 Darlene Way, C-10
Boulder City, NV 89005
USA

011-494



"Ryan Carrico"
<rcarrico@infomagic.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 02:42 AM

011-475

November 29, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ryan Carrico
3029 North Joy Lane
Flagstaff, AZ 86001
USA



"Niels Schaumann"
<nschaumann@wmitc
hell.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 11:20 AM

011-476

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Niels Schaumann
6923 Logan Ave. South
Richfield, MN 55423
USA



"Shane Hartman"
<shane@ai.mit.edu>
11/30/2002 11:23 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-477

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Shane Hartman
361 Oakwood Trail
Fairview, TX 75069
USA



"Reid Bell"
<reids@pobox.com>

11/30/2002 12:30 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-478

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Reid Bell
401 W. 118th st., B1
New York, NY 10027
USA



"Timothy Slocum"
<tslocum7@juno.com>
11/30/2002 12:49 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-479

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Timothy Slocum
4716 NW 28th Ter
Gainesville, FL 32605
USA



"Raymond Edwards"
<rge@knology.net>
11/30/2002 12:46 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-480

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Raymond Edwards
547 Martin Ln
Augusta, GA 30909
USA



"David Ballenger"
<dlb@davidballenger.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 12:49 PM

011-481

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Ballenger
9415 110th Place NE
Kirkland, WA 98033
USA



"Dan Erbele"
<whisperer69@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 01:01 PM

011-482

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Dan Erbele
106 N Elm St
Clarksville, IN 47129
USA



"George Fischer"
<gfischer@visi.com>
11/30/2002 01:01 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-483

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

George Fischer
17 S 1st St
Apt A1006
Minneapolis, MN 55401
USA



"Alan Field"
<alanf@earthlink.net>
11/30/2002 12:03 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-484

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Alan Field
1789 College Ave
Livermore, CA 94550
USA



"Michael O'Sullivan"
<mosullivan@gw.hamline.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 12:18 PM

011-485

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Michael O'Sullivan
4533 149th Court
Apple Valley, MN 55124
USA



"Don Hoover"
<don@hoover.net>
11/30/2002 10:35 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-486

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Don Hoover
3405 E Wissmiller Rd
Mikado, MI 48745
USA



"Lynn Cox"
<blowbreath@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 10:01 AM

011-487

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Lynn Cox
695 Mohican Way
Westerville, OH 43081
USA



"Erich Friesen,
Architect"
<erichbf@networkusa.
net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/30/2002 10:15 AM

011-488

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Erich Friesen, Architect
6154 Washington Blvd.
Saint Louis, MO 63112
USA



"C. M. Finuf Jr."
<mfinuf@hotmail.com>
11/30/2002 10:56 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-489

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

C. M. Finuf Jr.
4359 Wilson Valley Dr.
Fairfax, VA 22033
USA



"paula van de werken"
<paulacvdw@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 10:16 AM

011-490

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

paula van de werken
19 Nartoff Rd
Hollis, NH 03049
USA



"Elizabeth Campbell"
<ecam70@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 09:07 AM

011-491

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Elizabeth Campbell
313 Grant Street
Atlanta, GA 30312
USA



"Marc Perkel"
<marc@perkel.com>
11/30/2002 09:54 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-492

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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I am a strong believer in open government and that the government exists for the sole purpose of serving the People. I therefore believe that everything the government does should be available on the internet.

Sincerely,

Marc Perkel
1127 Munich St.
San Francisco, CA 94112
USA



"Jonathan Auer"
<jda@auerfamily.org>
11/30/2002 07:06 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-493

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jonathan Auer
279 E. Hoffman Rd.
Metamora, IL 61548
USA



"dennis dively"
<warlockwzd@lycos.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/30/2002 07:41 AM

011-494

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

dennis dively
417 e main st flr 1
Roaring Spring, PA 16673
USA



"Aloysius Wild"
<aaw@rincewind.tv>
11/30/2002 03:40 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-495

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Aloysius Wild
1222 Amherst Ave Apt 301
Los Angeles, CA 90025
USA



"Mark Molstad"
<rascal92002@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/30/2002 01:20 PM

011-496

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Mark Molstad
120 S Duluth Ave
Sioux Falls, SD 57104
USA



"Theodore Summers"
<djtb1@att.net>
11/30/2002 01:30 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
Cc:
Subject: I Oppose FAR Case 2002-011

011-497

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Theodore Summers
5206 F Street
Springfield, OR 97478
USA



"Elizabeth Edwards"
<ms_eli@yahoo.com>
11/30/2002 01:45 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-498

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Elizabeth Edwards
8102 Merion Drive
Newark, CA 94560
USA



"Cody Rank"
<cbrbassist@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 01:51 PM

011-499

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Cody Rank
525 Mt. Washington Dr.
Los Angeles, CA 90065
USA



"John Milton
Hendricks"
<johndtiger@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 01:58 PM

011-500

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Milton Hendricks
7 W. Court Street #42
Cincinnati, OH 45202
USA



"Robert Kane"
<robertkane@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 01:59 PM

811-501

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Kane
235 Holyoke St.
San Francisco, CA 94134
USA



"Marx Rivera"
<marx@nyct.net>

12/02/2002 04:38 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-502

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Marx Rivera
104-66 126th street
South Richmond Hill, NY 11419
USA

011-503

Paul A. Arrigo
Head Librarian
Lartz Memorial Library
Penn State Shenango
177 Vine Ave.
Sharon, PA 16146

Dear FAR Secretariat,

As a citizen of the United States, a Republican and a former depository librarian, I would like to say that this F.A.R. amendment, (FAR case 2002-011) is flawed in many ways. The primary problem is that this regulation, if promulgated, will violate U.S.C. Title 44. The least OMB should do is wait for a Supreme Court interpretation of this title before going out and making your own laws. It is important to remember, lest the current administration has lost its grip on political reality, that America is a Republic and the citizens elect their representatives to pass laws and make legislation not Presidentially appointed agency heads. Weren't Republicans dismayed by President Clinton's attempts to work around the law with rules and regulations, yet the Bush Administration is attempting to do the same thing.

Decentralization of Printing

I really like the Federal Enterprise Architecture Program Management Office's (FEAPMO) Business Reference Model that OMB is working on to reduce duplication of effort across agencies and improve Agency management in the area of Information Technology. However, this F.A.R. regulation flies in the face of the FEAPMO goals. Rather than centralizing the printing process with GPO, OMB is advising agencies to establish their own printing contracts. This will significantly increase duplication of effort, costing each agency time and money to hire and train in-house printing contract negotiators. The economies of scale would also be significantly reduced if each agency procured their own printing contracts. The decentralization of printing would allow printers to charge more for each Agency because the competitive bid process would not be as large as GPO's.

GPO already provides a great service for printers and the Agencies. GPO provides a place of one stop shopping for their printing needs. Many agencies do not know the technical requirements when procuring a printing contract. Many agencies will need to learn more about the technical requirement of printing their publications. It seems like a great waste of time and resources to me.

Addressing the Problem of Fugitive Documents

In your proposed regulation you try to tackle the problem of fugitive documents, which is commendable, but the process you recommend will not work any better than it does now. Currently there is no strong incentive or sanction to entice/coerce agencies to submit their documents to the Superintendent of Documents. Nowhere in the regulation do I see a strong

011-503

incentive for Federal Agencies to submit their documents nor any sanctions should they fail to do so. This would not solve the fugitive documents problem any more than the current law does.

Secondly, decentralizing the printing of government documents will exacerbate the problem of fugitive documents especially when GPO is required to purchase copies of Government publications from Agencies who contract directly with private sector printers. This is contrary to current law. This regulation also reverses who will pay for issues to be sent to the Federal Depository Libraries. Currently that cost is born by the Agencies. Your regulation will turn that around and make GPO bare the cost of printing for the Depository Libraries. OMB is just passing on the cost of information distribution from the Agency to GPO.

In conclusion, the best your agency could do would be to drop this entire regulation and follow the guidance of Title 44 until you hear differently in the form of a Supreme Court opinion.

Sincerely,

Paul A. Arrigo



"Kevin Middleton"
<kmm@brown.edu>
11/30/2002 02:16 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-504

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 124, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Kevin Middleton
2604 Holly Point Rd. E.
Orange Park, FL 32073
USA



"James Cardwell"
<nick76@email.com>

11/30/2002 02:41 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-505

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

James Cardwell
10107 Lindelaan Dr
Tampa, FL 33618
USA



"R. Randall Rathbun"
<randy@randyrathbun.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 02:49 PM

011-506

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

R. Randall Rathbun
18602 Cheyenne Drive
Independence, MO 64056
USA



"Marvin Sirbu"
<sirbu@cmu.edu>

11/30/2002 02:53 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-507

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO).

Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Marvin Sirbu
1050 Devor Road
Pittsburgh, PA 15213
USA



"Ian Campbell"
<idcampbe@mail.wash
oe.nv.us>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 02:55 PM

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Ian Campbell
301 S. Center Street
Reno, NV 89501
USA

011-508



"David Truog"
<truogd@fienv.net>
11/30/2002 03:22 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

David Truog
517 21st ST APT 201
Virginia Beach, VA 23451
USA

011-509



"Eric Brown"
<eric-n-brown@uiowa.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 03:50 PM

011-510

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Eric Brown
31 Gryn Ct
Iowa City, IA 52246
USA



"Clyde Peel"
<cpeel@sirisonline.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 03:51 PM

011-511

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Clyde Peel
919 S 15th St
Centerville, IA 52544
USA



"Eliot Freidson"
<efreidson@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 04:34 PM

011-512

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Eliot Freidson
1950 Clay St., #302
San Francisco, CA 94109
USA



"John Jowers"
<jlj17@pitt.edu>

11/30/2002 04:36 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-513

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Jowers
5911 Douglas St.
Pittsburgh, PA 15217
USA



"Jennifer Leone"
<leonej@ipfw.edu>
11/30/2002 04:37 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-514

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jennifer Leone
2101 E. Coliseum Blvd.
Fort Wayne, IN 46805
USA



"Daniel Martinez"
<dfm@area.com>

11/30/2002 04:42 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-515

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Daniel Martinez
423 N. 26th Street, #11
San Jose, CA 95116
USA



"Jane Marks"
<jmarks@faulkner.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 05:08 PM

011-516

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jane Marks
Faulkner University
Jones School of Law Library
Montgomery, AL 36109
USA



"Kendra Kuykendall"
<jainieg@yahoo.com>

11/30/2002 05:19 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-517

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Kendra Kuykendall
#2 Silk Oaks Dr
Ormond Beach, FL 32176
USA



"Robert Desmond"
<angwe23@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 05:46 PM

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-518

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Desmond
6590 Cordoba Rd. #3
Goleta, CA 93117
USA



"Kathleen McCook"
<kmccook@tampabay.
rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 05:48 PM

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-519

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Sincerely,

Kathleen McCook
602 4th Avenue SW
Ruskin, FL 33570
USA



"Paul Spoerry"
<email@paulspoerry.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 06:01 PM

011-520

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Paul Spoerry
12727 Coeur Du Monde Ct.
Apt. K
Saint Louis, MO 63146
USA



"Thomas Gideon"
<thomas@gideonfamily.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 06:16 PM

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-521

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Thomas Gideon
14017 Drake Drive
Rockville, MD 20853
USA



"Paul Dupuy"
<paul@hiwaay.net>

11/30/2002 06:37 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Paul Dupuy
19910 10th Dr SE
Bothell, WA 98012
USA

011-522



"Roger Keyes"
<rskeyes@ix.netcom.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 06:41 PM

011-523

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Roger Keyes
107 Arbor Creek Ct.
Las Vegas, NV 89123
USA



"Saul Grand"
<sollygra@optonline.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 06:52 PM

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Saul Grand
8 Woodland Rd
Valley Stream, NY 11581
USA

011-524



"Amanda Schehr"
<josefiendhoooha@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 06:52 PM

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-525

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Amanda Schehr
1525 S High St
Columbus, OH 43207
USA



"Michael Manners"
<mannersm@swbell.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 08:00 PM

011-526

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Manners
6900 NW 35th
Bethany, OK 73008
USA



"Graham Andrews"
<animefortress@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 08:18 PM

011-527

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Graham Andrews
766 Grant Place
Boulder, CO 80302
USA



"Morgan Herman"
<r2q2@attbi.com>

11/30/2002 08:20 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-528

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Morgan Herman
1549 No Cicero Ave
Chicago, IL 60651
USA



"Bill Rickords"
<bricko@cox.net>

11/30/2002 08:25 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-529

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Bill Rickords
6532 Oneil St
Wichita, KS 67212
USA



"Zachary VerGow"
<zvergow@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 08:33 PM

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Zachary VerGow
19 Crowe Farm Ln
Norton, MA 02766
USA

011-530



"david vanthournout"
<thelorax@planet-save
.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 08:41 PM

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

david vanthournout
1332 25th ave
Rock Island, IL 61201
USA

011-531



"Harold Burstyn"
<burstynh@iname.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 09:15 PM

011-532

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Harold Burstyn
216 Bradford Parkway
Syracuse, NY 13224
USA



"Greg Williams"
<gregwilly@abac.com>
11/30/2002 10:02 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-533

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Greg Williams
19744 Mount Israel Pl
Escondido, CA 92029
USA



"mary cassell"
<cassellmary@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

11/30/2002 10:37 PM

011-534

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

mary cassell
3007c san clara dr
Delray Beach, FL 33445
USA



"Elisa Carlson"
<wilson15@mail.usf.edu
u>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 10:54 PM

011-535

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Elisa Carlson
6404 S. Queensway Dr.
Temple Terrace, FL 33617
USA



"Daniel Orr"
<daniel.e.orr@vanderbi
lt.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 11:11 PM

011-536

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Daniel Orr
250 Louise Ave.
Nashville, TN 37203
USA



"Victor DeAngelo"
<ichabodvic@mac.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

11/30/2002 11:59 PM

011-531

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Victor DeAngelo
804 Euclid Avenue
Apt. #2
San Francisco, CA 94118
USA



"Jeremiah Blatz"
<eff@jeremiahblatz.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/01/2002 12:06 AM

011-538

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jeremiah Blatz
240 Mercer St.
Apt 1506
New York, NY 10012
USA



"George Tipsword"
<stipsword@sbcglobal
.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 12:08 AM

011-539

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

George Tipsword
31 Falling Star Ct
The Woodlands, TX 77381
USA



"Eileen Shannahan"
<gia6066@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/01/2002 12:23 AM

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-540

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Eileen Shannahan
1515 W Barr Dr
Tampa, FL 33603
USA



"Michael Barnes"
<action@erinandmike.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 12:32 AM

011-541

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Barnes
3305 Shasta Dr
San Mateo, CA 94403
USA



"Dennis Ingram"
<dc_i_001@yahoo.com>
12/01/2002 12:42 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-542

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Dennis Ingram
1851 E Delta Ave
Mesa, AZ 85204
USA



"Jesse Card"
<jester14m@aol.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 12:44 AM

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jesse Card
2928 Hoyt Ave Apt B
Everett, WA 98201
USA

011-543



"Jonathan Schiff"
<jschiff139@aol.com>

12/01/2002 01:33 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-544

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jonathan Schiff
5465 Kenwood Rd
502
Cincinnati, OH 45227
USA



"Noah Glass"
<noah@listenlab.com>
12/01/2002 01:34 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-545

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Noah Glass
3916 26th St
San Francisco, CA 94131
USA



"Neil Sandow"
<neil@q3.com>

12/01/2002 02:04 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-546

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Neil Sandow
3001 Branciforte Drive
Santa Cruz, CA 95065
USA



"E G"
<beyo@myrealbox.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 02:21 AM

011-547

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

E G
4401 Elysian Fields Ave
New Orleans, LA 70122
USA



"John Kramer"
<johnikramer@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 02:58 AM

011-548

November 30, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Kramer
125 Sanford St. Apt. 2
Rochester, NY 14620
USA



"Desiree Coulter"
<desireedarktales@pro
digy.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 03:07 AM

011-549

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Desiree Coulter
31250 Highway 20
Fort Bragg, CA 95437
USA



"Felipe Albertao"
<felipev@bigfoot.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 04:46 AM

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Felipe Albertao
555 E. Washington Ave.
Apt. 210
Sunnyvale, CA 94086
USA

011-550



"Mark Lutz"
<mialutz@charter.net>
12/01/2002 07:01 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-551

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Mark Lutz
106 Ruskin Drive
Altoona, PA 16602
USA



"Richard Edwards"
<richard.edwards@we
bbox.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 07:18 AM

011-552

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I'am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Richard Edwards
816 N Main St
Dodd City, TX 75438
USA



"Gary Moraco"
<hempdude@citlink.net>
t>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 08:28 AM

011-553

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Gary Moraco
1916 Holman City Road
Clayville, NY 13322
USA



"erika hatcher"
<kerberoslives@icqma
il.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 08:29 AM

011-554

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

erika hatcher
129 e. welcome ave #4
Mankato, MN 56001
USA



"Daniel Duff"
<sndspm@bellsouth.net>

12/01/2002 08:41 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-555

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Daniel Duff
522 SW Tularosa Lane
Lake City, FL 32025
USA



"RAYMOND DUNN"
<rdunn@rdunn.com>
12/01/2002 08:43 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-556

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

RAYMOND DUNN
3718 SHADY BROOK DR.
Franklinville, NC 27248
USA



"George Willis"
<mrjoebob@mindsprin
g.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 09:37 AM

011-557

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

George Willis
7457 Egypt Lane
Louisville, KY 40219
USA



"Christopher
Wenneman"
<chris_wenneman@m
sn.com>

12/01/2002 09:56 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-558

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Christopher Wenneman
2134 Bayhill Dr
Viera, FL 32940
USA



"Jeffrey Gschwend"
<jgschwen@enteract.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 10:01 AM

011-559

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Sincerely,

Jeffrey Gschwend
14350 W Forest Dr
Lake Forest, IL 60045
USA



"Jean Andrews"
<egret27@tampabay.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 10:38 AM

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Sincerely,

Jean Andrews
172 Mar St.
St Pete Beach, FL 33706
USA

011-560



"John Redmon"
<jc_redmon@webtv.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/01/2002 11:05 AM

011-541

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

John Redmon
120 N. Pine St.
Middletown, PA 17057
USA



"Bill Michtom"
<michtom@alexia.lis.ui
uc.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 11:12 AM

011-562

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

As a librarian with a main interest in government publications, I am aware of the work that the Government Printing Office has done for more than a century to keep United States citizens informed of the workings of all parts of their government.

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the GPO. Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Bill Michtom
1110 SW Clay St Apt 33
Portland, OR 97201
USA



"Beth Macknik"
<eff@macknik.net>
12/01/2002 11:45 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-563

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Sincerely,

Beth Macknik
9612 Blue Creek Ln
Austin, TX 78758
USA



"Robert Couchman"
<couchman@execpc.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 12:24 PM

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Couchman
7162 County Line Road
Hartland, WI 53029
USA

011-564



"Andrew Williams"
<andrew@andrewcentral.net>

12/01/2002 12:32 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-565

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Andrew Williams
412 Co. Rd 508
Anderson, AL 35610
USA



"Mark Schwebke"
<mschwebke@attbi.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 12:36 PM

011-566

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Mark Schwebke
1653 SE Linn
Portland, OR 97202
USA



"Lesley Pease"
<ldpease@library.syr.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 01:11 PM

011-567

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Lesley Pease
222 WAVERLY AVENUE
Syracuse, NY 13244
USA



"Mark McCarthy"
<mark314@juno.com>
12/01/2002 01:32 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-568

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Mark McCarthy
4211 Clay Hill Dr Apt 1208
Houston, TX 77084
USA



"Jacqueline Lasahn"
<ritualist@earthlink.net>
t>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 01:54 PM

011-569

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jacqueline Lasahn
6262 Bernhard Ave
Richmond, CA 94805
USA



"Dan Barkley"
<barkley@unm.edu>
12/01/2002 02:35 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-570

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Dan Barkley
3549 California NE
Albuquerque, NM 87110
USA



"William Wertenbaker"
<liam@centralpets.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 02:51 PM

011-571

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

William Wertenbaker
PO Box 484
Cherry Valley, NY 13320
USA



"John Oakley"
<tigerdragonclaw@aol.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 03:19 PM

011-572

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Oakley
16413 Nation Rd
Kearney, MO 64060
USA



"Gregory Catalone"
<gcatalone@mac.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 03:36 PM

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gregory Catalone
49 Fulton St
Akron, PA 17501
USA

011-573



"Marian Wynn"
<citizen@direcway.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 03:46 PM

011-574

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Marian Wynn
2780 State Highway 85
Geneva, AL 36340
USA



"Michael Cole"
<mi_cole@swbell.net>
12/01/2002 03:47 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-575

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Cole
6210 N Meridian
Apt 101
Oklahoma City, OK 73112
USA



"Tim Bloom"
<timbloom@mac.com>
12/01/2002 04:03 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-576

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Tim Bloom
8402 Bridlewood
Wichita, KS 67206
USA



"Albert Sweigart"
<asweigart@mail.utexas.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 04:23 PM

011-577

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Albert Sweigart
1600 Royal Crest Dr. #208
Austin, TX 78741
USA



"C. Scott Ananian"
<eff@cscott.net>

12/01/2002 05:11 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-578

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

C. Scott Ananian
305 Memorial Drive
Cambridge, MA 02139
USA



"Robert Owens"
<bingowens@yahoo.com>

12/01/2002 05:19 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-579

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Owens
5912 North Navarre
Chicago, IL 60631
USA



"Christopher
Pedersen"
<solublefish@localnet.
com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 05:20 PM

011-580

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Christopher Pedersen
132 Bellehurst Dr
Rochester, NY 14617
USA



"Jonathan Sailor"
<jesboat@yahoo.com>
12/01/2002 05:55 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-581

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jonathan Sailor
234 Slade St
Belmont, MA 02478
USA



"Ron Giesman"
<ron@giesman.homeip
.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/01/2002 05:59 PM

011-582

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ron Giesman
206 James Street
PO Box 103
Jackson Center, OH 45334
USA



"Kevin Rolfes"
<kevin@rolfes.org>
12/01/2002 06:41 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-583

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kevin Rolfes
14006 N. Green Hills Loop
Austin, TX 78737
USA



"Joe Venzon"
<joe@venzon.net>
12/01/2002 06:57 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-584

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joe Venzon
4317 8th Ave NE
Apt # A-406
Seattle, WA 98105
USA



"Linda N. Sullivan"
<lnissley@yahoo.com>
12/01/2002 07:50 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-585

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Linda N. Sullivan
56 Mt. Vernon Street
Arlington, MA 02476
USA



"Eric Dynamic"
<ecsd@ecsd.com>

12/01/2002 08:23 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-586

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Eric Dynamic
1831 Berkeley Way #4
Berkeley, CA 94703
USA



"Jason Ellison"
<infotek@jasonellison.
homelinux.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 08:30 PM

011-587

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jason Ellison
20154 Thompson Hall Road
Fairhope, AL 36532
USA



"Brian Raker"
<pfy@pfy.cc>

12/01/2002 08:31 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-588

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Brian Raker
455 Robin Hill Road
Clarksville, TN 37043
USA



"Patrick O'Hara"
<pgohara@pandl.biz>
12/01/2002 08:56 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-589

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Patrick O'Hara
9523 Mitchell Glen Dr
Charlotte, NC 28277
USA



"William McKee"
<wlm@knowmad.com>
12/01/2002 09:06 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-590

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

William McKee
2201 Shenandoah Ave
Charlotte, NC 28205
USA



"Allen Small"
<Allen.Small@umit.maine.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 09:12 PM

011-591

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Allen Small
PO Box 282
65 Goodrich Road
Bingham, ME 04920
USA



"Nelson Pavlosky"
<nelson2888@aol.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 09:30 PM

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Nelson Pavlosky
71 Littleton Rd
Morris Plains, NJ 07950
USA

011-592



"Ethan Frantz"
<ethan@pwpconsult.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 09:48 PM

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ethan Frantz
8468 N Overland Ct.
Kansas City, MO 64154
USA

011-593



"Kathleen Jones"
<Cyllaros@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 10:14 PM

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-594

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kathleen Jones
2505 David Ave
Pacific Grove, CA 93950
USA



"Brian Bradley"
<decompression@mac.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 10:37 PM

011-595

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Brian Bradley
2916 2nd Ave North
Saint Petersburg, FL 33713
USA



"Charles Plater"
<cplater@mac.com>
12/01/2002 10:52 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-596

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Charles Plater
18656 Lennane
Redford, MI 48240
USA



"THOMAS Reynolds"
<BuzzardTom@classic
net.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 10:54 PM

011-597

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

THOMAS Reynolds
508 Matador St
Burkburnett, TX 76354
USA



"Shawn Auberzinski"
<aubers@alum.rpi.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 10:57 PM

011-598

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Shawn Auberzinski
123 Ryckman Ave
2L
Albany, NY 12208
USA



"CJ Hillman"
<hillman@prodigy.net>
12/01/2002 11:04 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-599

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

CJ Hillman
808 11th Ave SW
Rio Rancho, NM 87124
USA



"Carl Campbell"
<carlcampbelljr@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 11:20 PM

011-600

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Carl Campbell
801A Hardin St
Columbia, MO 65203
USA



"Roderic Collins"
<collinsr@cs.rpi.edu>
12/01/2002 11:22 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

2002 - 011 - 601

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO).

Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Roderic Collins
One Washington Place
#3
Troy, NY 12180
USA



"Jason Greene"
<jason@inetgurus.net>
12/01/2002 11:36 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-602

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jason Greene
2903 Holborn Circle
Madison, WI 53718
USA



"Robert Jagger"
<jagger@oznog.org>
12/01/2002 11:46 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-603

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Robert Jagger
PO Box 86
Springvale, ME 04083
USA



"Joshua McConaha"
<political@mcconaha.com>

12/01/2002 11:58 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-604

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Joshua McConaha
200 Shafer Ave.
Dover, OH 44622
USA



"Carter St.Clair"
<carterstclair@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 12:20 AM

011-605

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

Carter St.Clair
15560 SW 106th Lane #1316
Miami, FL 33196
USA



"Christopher
Frankonis"
<bix@theonetruebix.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 12:28 AM

011-606

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Christopher Frankonis
4221 SE Division St
Portland, OR 97206
USA



"Lynette Bellini"
<lynette@ics.uci.edu>
12/02/2002 12:29 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-607

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Lynette Bellini
3908 N Lincoln St.
Westmont, IL 60559
USA



"Ryan Joy"
<ryan@joyserve.net>
12/02/2002 01:08 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-608

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Ryan Joy
915 Duncan Ln
Austin, TX 78705
USA



"Javier Jones"
<javier@projsound.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 03:12 AM

011-609

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Javier Jones
978 Barnacle Drive
Manahawkin, NJ 08050
USA



"Sarah Maximiek"
<maximiek1@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 07:48 AM

011-610

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Sarah Maximiek
109 Sargeant St.
Apt. 1
Johnson City, NY 13790
USA



"B.J. Herbison"
<bj@herbison.com>
12/02/2002 07:57 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-011

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

B.J. Herbison
203 Long Hill Road
Bolton, MA 01740
USA



"Joan Taub"
<jtaub@nplhub.org>
12/02/2002 08:03 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-612

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joan Taub
268 Monroe Avenue
River Edge, NJ 07661
USA



"judith robinson"
<lisrobin@buffalo.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 08:08 AM

011-613

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

judith robinson
534 baldy
university at buffalo
Buffalo, NY 14260
USA



"Nora Dimmock"
<ns23@acsu.buffalo.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 08:31 AM

011-614

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Nora Dimmock
307 Laburnam Crescent
Rochester, NY 14620
USA



"Sandra Groleau"
<sgroleau@abacus.bates.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 08:35 AM

011-615

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Sandra Groleau
100 Central Avenue
Lewiston, ME 04240
USA



"Joseph Ritter"
<joe@spirittime.com>
12/02/2002 08:42 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-616

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joseph Ritter
548 Creek Road
Pipersville, PA 18947
USA



"Cynthia McKane"
<mchorton@cecomet.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 08:42 AM

011-617

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Cynthia McKane
80 Jamestown Street
Randolph, NY 14772
USA



"Luke Griffin"
<luke@romancoins.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 08:43 AM

011-618

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Luke Griffin
7565 Nisbet Lake Rd.
Jacksonville, AL 36265
USA



"Bradford Malone"
<malo7913@rochester.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 08:44 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Bradford Malone
1450 Wood Dr #26
Farmington, NY 14425
USA

011-619



"Everien Malone"
<efadgen@rochester.rr
.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 08:45 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-620

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Everien Malone
1450 Wood Dr #26
Farmington, NY 14425
USA



"Karen Chopra"
<karenchopra@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 08:46 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Karen Chopra
2627 Stony Point Road
Grand Island, NY 14072
USA

011-621



"Jeff Cogshall"
<jcogs@mindspring.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 08:53 AM

011-622

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeff Cogshall
41 Murray St
New York, NY 10007
USA



"Tido Ciaravino"
<tido@lendingtree.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 02:46 PM

011-623

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

What follows is a draft letter from the EFF that accurately represents my opinion. The fact that i am forwarding a draft should not be construed in any way to indicate less support on my part to the issue, or suggest to you that you may be less attentive to the issue. This is very important to me, but i do not want to risk losing some of the details by paraphrasing what i consider to be a very good representation of my feelings on the subject.

Thank you in advance for your support.

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Sincerely,

Tido Ciaravino
3712 Woodhill Drive
Tallahassee, FL 32303
USA



"Mark Ayers"
<n2sami@attbi.com>
12/02/2002 02:38 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-624

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Mark Ayers
2400 Fourth AVE #607
Seattle, WA 98121
USA



"J. Paul Davidson"
<jpaul.davidson@tccd.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 02:37 PM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

J. Paul Davidson
4605 Biscayne Dr.
Haltom City, TX 76117
USA

011-625



"Randall Reiss"
<randyr@rcn.com>
12/02/2002 02:34 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-626

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Randall Reiss
1542 Hayes St Apt A
San Francisco, CA 94117
USA



"Archer, Mary Ann"
<marcher@wmitchell.edu>

12/02/2002 02:31 PM

To: "'farcase.2002-011@gsa.gov'" <farcase.2002-011@gsa.gov>
cc:
Subject: PROPOSED TRANSFER OF GPO PRINTING TO PRIVATE
PRINTERS -- PLEASE DON'T!

011-627

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

OMB cites cost and small business opportunity as the main reasons for the change. However, in the May 6th issue of *Government Executive* magazine Ben Cooper, a representative of the Printing Industries of America, pointed out that his industry group opposed the change and supported the existing arrangement because "GPO charges fees that most printers would agree are rock-bottom" and because GPO assures in their contract process that printers throughout the country have an opportunity to procure government printing jobs. Furthermore, executive agencies will, in bypassing GPO, have to re-create the structure and staffing which GPO already has in place to coordinate printing and perform the necessary administrative functions needed to follow a printing contract through to a successful completion. It is hard to see how such duplication of effort could possibly save money.

My husband is a retired professor from the Graphic Arts and Photography Department of Rochester (NY) Institute of Technology. In this capacity, he worked extensively with the staff of GPO and recognized their expertise and devotion to making public documents of fine quality which were affordable to our citizens. The GPO is recognized world wide as a superb government printing agency. It is visited frequently by representatives of other governments as a model for distributing government information efficiently and economically. On a technical level, the GPO has been in the forefront of developing and implementing effective printing technology.

Another area of concern is the effect that the proposed regulation will have on citizen's access to government produced information. Currently, when GPO produces an item for any Federal agency it also arranges for copies to be distributed to over 1,300 Federal Depository Libraries. Our law school library is one of these. The proposed regulation would mandate that one copy of any document be provided to GPO for distribution through the depository system. If a hard copy is to be provided to every participating library, then this one supplied copy must now be re-produced in print form, which would necessitate that GPO spend additional tax dollars to create enough copies to distribute. To make matters worse, one has to wonder if GPO would even get the single, mandated copy. Presently, even with government information distribution centralized at GPO, nearly 50% of all government documents are not included in the depository program (as OMB admits). It is ludicrous to suggest that distribution to libraries and users will be improved by decentralizing printing production.

Access to accurate and timely government information is essential in a democratic society; the GPO has provided that access.

Finally, I urge you to respect H.J. Res. 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Mary Ann E. Archer, Esq.

Associate Director for Public Services
Warren E. Burger Library
William Mitchell College of Law
871 Summit Avenue
St Paul MN 55105
(651) 290-6306

011-627



"Margalit Post"
<MargalitPost@aol.co
m>

12/02/2002 02:31 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-628

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Margalit Post
22 Franklin St
Williamsville, NY 14221
USA



"Yaron Goland"
<effactioncenter@goland.org>

12/02/2002 02:22 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-629

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Yaron Goland
2049 Minor Ave E
Seattle, WA 98102
USA



"Fernando Frausto"
<krsjuan@adelphia.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 02:17 PM

011-630

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Fernando Frausto
1619 benik rd
La Habra Heights, CA 90631
USA



"Christoph Weber"
<weber@scripps.edu>

12/02/2002 02:10 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-631

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Christoph Weber
5957 Erlanger St.
San Diego, CA 92122
USA



"Cindy Rosser"
<crosser@slpl.lib.mo.us>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 02:08 PM

011-632

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Cindy Rosser
St. Louis Public Library
1301 Olive
St. Louis, MO 63103
USA



"Karen Heil"
<thrall2@warwick.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 02:04 PM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Karen Heil
11-19 Depot St
Middletown, NY 10940
USA

011-633



"Judy Helms"
<judyhelms@hotmail.com>

To: farcase.2002-011@gsa.gov
cc:
Subject: GPO

12/02/2002 02:05 PM

011-634

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.
Judy Helms

MSN 8 with e-mail virus protection service: 2 months FREE*
<http://join.msn.com/?page=features/virus>



"Gloria Beck"
<gbeck@vsu.edu>

12/02/2002 02:00 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-635

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gloria Beck
P.O. Box 9406
Virginia State University
Petersburg, VA 23806
USA



"Francis Norton"
<fxnorton@loyno.edu>
12/02/2002 02:01 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: GPO

011-636

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

I am concerned that the proposed regulation will adversely impact citizen access to government produced information. Currently, when GPO produces an item for any Federal agency it also arranges for copies to be distributed to over 1,300 Federal Depository Libraries. The proposed regulation would mandate that one copy of any document be provided to GPO for distribution through the depository system. If a hard copy is to be provided to every participating library, then this one supplied copy must now be re-produced in print form, which would necessitate that GPO spend additional tax dollars to create enough copies to distribute. To make matters worse, one has to wonder if GPO would even get the single, mandated copy. Presently, even with government information distribution centralized at GPO, nearly 50% of all government documents are not included in the depository program (as OMB admits). It is ludicrous to suggest that distribution to libraries and users will be improved by decentralizing printing production.

Please reject the OMB proposal. Actually, increasing GPO's budget is a far better way to serve the public.

--

Francis X. Norton, Jr.
Reference Librarian and Assistant Professor
Loyola University New Orleans Law Library
7214 St. Charles Avenue
Campus Box 903
New Orleans, LA 70118
(504) 861-5548
fax: 504-861-5895



"Elizabeth Rogers"
<deedee.rogers@tccd.
edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 01:48 PM

011-637

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Elizabeth Rogers
1557Weyland Dr.
#1602
No. Richland Hills, TX 76180
USA



"Seanan Murphy"
<seanan.murphy@computer.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 01:46 PM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-638

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Seanan Murphy
955 26th ST NW #708
Washington, DC 20037
USA



"Daniel Rodriguez"
<katsushiro@prtc.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/02/2002 01:41 PM

011-639

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Daniel Rodriguez
35 Calle Parentesis
Munoz Rivera
Guaynabo, PR 00969
USA



"Bruce Birch"
<bebirch@biostruct.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 01:37 PM

011-640

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Bruce Birch
11187 Kelowna Rd. #76
San Diego, CA 92126
USA



"Kimberly Stone"
<kimstone@unt.edu>
12/02/2002 01:22 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-641

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Kimberly Stone
6802 Vivian Avenue
Dallas, TX 75223
USA



"James Jacobs"
<jrjacobs@ucsd.edu>
12/02/2002 01:20 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-642

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

James Jacobs
4241 Third Avenue
San Diego, CA 92103
USA



"Patrick Ryan"
<pmryan@acm.org>
12/02/2002 12:57 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-643

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Patrick Ryan
4916 Norbeck Rd
Rockville, MD 20853
USA



mhawkins@hklaw.com

12/02/2002 12:55 PM

To: farcase.2002-011@gsa.gov

cc:

Subject: FAR Case 2002-011

011-644

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Margie Hawkins, Librarian
Holland & Knight LLP
200 S. Orange Ave., Suite 2600
Orlando, FL 32801
Voice: 407.244.1153
Fax: 407.244.5288
mhawkins@hklaw.com

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"Dick Breen"
<dbreen@willamette.edu>

12/02/2002 01:00 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: GPO Outsourcing Proposal

011-645

FAR Council,

The OMB proposal to outsource government printing and thereby bypass the GPO will ultimately do a great disservice to the public who rely for government information on an efficient depository distribution system which minimizes fugitive documents. Why create a problem when none exists?

The GPO already outsources a great deal of printing to private printers.

Sincerely,

Richard F. Breen

--

Richard F. Breen, Director
Willamette University College of Law Library
245 Winter Street, S.E.
Salem, OR 97301

Tel: (503) 370-6386
Fax: (503) 375-5426
<http://www.willamette.edu/law/longlib>



"Jane Platt-Brown"
<Jane.Platt-Brown@cw
t.com>

To: farcase.2002-011@gsa.gov
cc:
Subject: OMB proposal

12/02/2002 12:53 PM

011-646

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect H.J. Res. 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,
Jane Platt-Brown
Librarian
Cadwalader, Wickersham & Taft

=====
NOTE: The information in this email is confidential and may be legally privileged. If you are not the intended recipient, you must not read, use or disseminate the information. Although this email and any attachments are believed to be free of any virus or other defect that might affect any computer system into which it is received and opened, it is the responsibility of the recipient to ensure that it is virus free and no responsibility is accepted by Cadwalader, Wickersham

011-646

& Taft for any loss or damage arising in any way from its use.

=====

=====

NOTE: The information in this email is confidential and may be legally privileged. If you are not the intended recipient, you must not read, use or disseminate the information. Although this email and any attachments are believed to be free of any virus or other defect that might affect any computer system into which it is received and opened, it is the responsibility of the recipient to ensure that it is virus free and no responsibility is accepted by Cadwalader, Wickersham & Taft for any loss or damage arising in any way from its use.

=====



"Jeffrey Mandel"
<jeff.mandel@probes.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 12:47 PM

011-647

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jeffrey Mandel
680 West 27th Avenue
Eugene, OR 97405
USA



"Brad Myers"
<bam@cs.cmu.edu>
12/02/2002 12:46 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-648

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Brad Myers
400 South Homewood Avenue
Pittsburgh, PA 15208
USA



"Ruth Gervais"
<rgervais@pswlaw.com>

12/02/2002 12:48 PM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: FAR Case 2002-11-PLEASE REJECT

011-649

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ruth Gervais
Librarian
Polsinelli Shalton Welte
700 W 47th St, Ste 1000
Kansas City, MO 64112
(816)360-4353
(816)753-1536 (fax)
rgervais@pswlaw.com



"Richard J. Powell"
<rpowell@scolaro.com
>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

12/02/2002 12:41 PM

011-650

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Richard J. Powell

Richard J. Powell, Librarian
Scolaro, Shulman, Cohen, Fetter & Burstein, P.C.
90 Presidential Plaza
Syracuse, NY 13202
Phone: 315-471-8111 ext.238
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Email: rpowell@scolaro.com
Web Site: www.scolaro.com

011-658

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"Loretta Mershon"
<lmershon@wpo.nccu.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 12:40 PM

011-651

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Loretta Mershon
NCCU Law Library
1512 S. Alston Ave.
Durham, NC 27707
USA



"Craig Posmantur"
<c.posmantur@att.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 12:34 PM

011-652

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Craig Posmantur
56 Beech Road
Egbertsville, NY 14226
USA



"Tom Nolan"
<gweatherlight@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/02/2002 12:29 PM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-653

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Tom Nolan
67771 Cater Hill Rd
Quaker City, OH 43773
USA



"Michael Gustine"
<infandous32@yahoo.
com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 12:20 PM

011-654

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Gustine
552 Lancashire Ln
State College, PA 16803
USA



"Erik Burton"
<burtone@grinnell.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 12:19 PM

011-655

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Erik Burton
3216 East 24th St.
Minneapolis, MN 55406
USA



"Ann Dedek"
<adedek@browardlibrary.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 12:18 PM

011-656

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Ann Dedek
637 Azalea Ct
Plantation, FL 33317
USA



"Monica Smith"
<monismith1@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 12:11 PM

011-657

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Monica Smith
711 Seabright Ave
#9
Santa Cruz, CA 95062
USA



"Diane Downing"
<diane_downing@tam
u-commerce.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 12:03 PM

011-658

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Diane Downing
1001 Sycamore
Commerce, TX 75428
USA



"Nathan Bussey"
<njb@spro.net>

12/02/2002 12:02 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-659

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Nathan Bussey
11621 W Freedom Dr
Boise, ID 83713
USA



"Darrin Hyrup"
<shades@mythicgame
s.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 12:00 PM

011-660

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Darrin Hyrup
9555 Blake Ln
Apt 103
Fairfax, VA 22031
USA



"Erik Hanson"
<erik@ehanson.net>
12/02/2002 11:59 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-661

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Erik Hanson
163 Bernard St. E.
West Saint Paul, MN 55118
USA



"Paul Hutchinson"
<me@paulhutch.com>

12/02/2002 11:58 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-462

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Paul Hutchinson
131C Main St
PO Box 563
Upton, MA 01568
USA



"Arlo Clauser"
<AClauser@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 11:57 AM

011-663

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Arlo Clauser
27 Wallingford ave apt d 6
Wallingford, PA 19086
USA



Jodie
<jmgd3@neo.rr.com>
12/02/2002 11:59 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: comment

011-664

We disagree with the proposal to bypass the Government Printing Office. By utilizing the GPO, a standard procedure and centralized procurement and access facility is now available. To disrupt that system with the notion of competition and saving taxpayer money is misleading. The GPO already contracts out some of their work but have the history and the ability to save money through the large amount of work they have printed. Therefore, the cost benefit is not and added incentive.

Unfortunately, it seems more apparent that by individual agencies printing their materials without a centralized cataloging process such as MOCAT, obtaining the materials and even knowing of their existence will become more difficult. We hope that is not the real intent of bypassing an economical and efficient system already provided by GPO.

Please reconsider the plan.
Jodie & Ned DeLamatre
akron, OH



"Georgia Baugh"
<baughga@slu.edu>
12/02/2002 11:53 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-605

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

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Sincerely,

Georgia Baugh
4755 Longspur Drive
Saint Louis, MO 63128
USA



"Allison Henry"
<akhenry@cats.ucsc.edu>

12/02/2002 11:52 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-666

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Allison Henry
410 Koshland Way
Santa Cruz, CA 95064
USA



"jeffrey melton"
<jmelton@nofi.org>
12/02/2002 11:52 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-667

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

jeffrey melton
1232 W. Washington Blvd.
Fort Wayne, IN 46802
USA



"Eric Smith"
<smithe@rmci.net>
12/02/2002 11:42 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-668

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Eric Smith
7514 W Devonwood Dr
Boise, ID 83703
USA



"Frank Wiles"
<frank@wiles.org>
12/02/2002 11:29 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-669

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Frank Wiles
622 Locust
Lawrence, KS 66044
USA



"Whitney Davis"
<quarvel@hotmail.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 11:29 AM

011-670

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Whitney Davis
2208 Brockington Rd.
Columbia, SC 29203
USA



"David Smeeton"
<dasmeeto@northcentral.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 11:25 AM

011-671

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

David Smeeton
3800 Minnehaha Ave. S. apt 30
Minneapolis, MN 55406
USA



"Tonia Burton"
<tburton3@rochester.r.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 11:22 AM

011-672

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Tonia Burton
34 Walden Creek Dr
Batavia, NY 14020
USA



"Jeremy Mays"
<jeremymays@mac.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 11:14 AM

011-673

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jeremy Mays
10511 Exeter Ave NE
Seattle, WA 98125
USA



"Mia Giglio"
<gigliomr@muc.edu>
12/02/2002 11:07 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-674

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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and Budget's (OMB) proposal on the Government Printing Office (GPO).

Specifically,

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Sincerely,

Mia Giglio
2324 Miller Ave.
Alliance, OH 44601
USA



"Karl Palutke"
<palutkek@asme.org>
12/02/2002 11:05 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-675

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Karl Palutke
800 Leisure Lake Drive
Apartment 18-B
Warner Robins, GA 31088
USA



"Carol Tobin"
<cmtobin@email.unc.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:57 AM

011-676

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Carol Tobin
321 Ferguson Rd
Chapel Hill, NC 27516
USA



"Deena Lipomi"
<dinalapomy@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:53 AM

011-677

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Deena Lipomi
10 Thayer St.
Apt. 3
Rochester, NY 14607
USA



"Mark Bay"
<uberlib@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:51 AM

011-678

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Mark Bay
84 Croley Bend Estates
Williamsburg, KY 40769
USA



"Diane Kinney"
<dk44@drexel.edu>
12/02/2002 10:49 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-679

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Diane Kinney
231 Mountain St
Phila, PA 19148
USA



"Pat Magierski"
<pmagierski@msn.com>

12/02/2002 10:48 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-680

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing and is the main source of federal government information for citizens. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Sincerely,

Pat Magierski
1530 E 59th St
Chicago, IL 60637
USA



"Randall Fidler"
<Randall.Fidler@testadvantage.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:40 AM

011-681

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Randall Fidler
3302 N 7th St
#369
Phoenix, AZ 85014
USA



"Collin Lynch"
<collinl@pitt.edu>

12/02/2002 10:38 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-682

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Collin Lynch
PO Box 81212
Pittsburgh, PA 15217
USA



"Michael Esler"
<esler@alumni.virginia.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:35 AM

011-683

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Esler
3131 N.Clifton
Chicago, IL 60657
USA



"John Montre"
<montrej@slu.edu>
12/02/2002 10:31 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-684

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Montre
3650 Lindell Blvd
Saint Louis, MO 63108
USA



"Michelle Arnold"
<marnold@clearwater-
fl.com>

12/02/2002 10:29 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-685

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michelle Arnold
121 N. Osceola Ave.
Clearwater, FL 33755
USA



"William J. Boarman"
<bboarman@cwa-unio
n.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:27 AM

011-686

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

William J. Boarman
615 Tower Bank Road
Severna Park, MD 21146
USA



"Judie Smith"
<judie.smith@tccd.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:24 AM

011-687

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Judie Smith
828 Harwood Road
Hurst, TX 76054
USA



"Patricia Conley"
<annette.conley@netx
v.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:22 AM

011-688

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Patricia Conley
RR 5 Box 280
Brownwood, TX 76801
USA



"Erin Kinney"
<e.kinney@attbi.com>
12/02/2002 10:21 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-689

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Erin Kinney
2316 Van Lennen Avenue
Cheyenne, WY 82001
USA



"William Fitzpatrick"
<billf@samwize6701.h
omeip.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:21 AM

011-690

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

William Fitzpatrick
6701 Ontario St
Springfield, VA 22152
USA



"Jeffrey Bragg"
<jefeweiss@msn.com>
12/02/2002 10:20 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-691

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jeffrey Bragg
117 E McCormick Ave #13
State College, PA 16801
USA



"Shari Salisbury"
<sas19@buffalo.edu>

12/02/2002 10:20 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-692

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Shari Salisbury
634 Eggert Rd.
Buffalo, NY 14215
USA



"Morgan Jones"
<mdjones_2000@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:16 AM

011-693

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Morgan Jones
7433 Hastings St
Springfield, VA 22150
USA



"Ryan Wuerth"
<Ryan_Wuerth@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:15 AM

011-694

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ryan Wuerth
16033 Stephens
Eastpointe, MI 48021
USA



"Sandra Downing"
<sdowning@utm.edu>

12/02/2002 10:14 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-695

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Sandra Downing
112 Brooks Drive
Martin, TN 38238
USA



"Chris San Bento"
<perminence@aol.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:05 AM

011-696

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Chris San Bento
155 Stonehenge Rd
Kingston, RI 02881
USA



"Matthew Gallagher"
<matthew.r.gallagher@
worldnet.att.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:05 AM

011-697

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Matthew Gallagher
1138 W. Patterson Ave. #1
Chicago, IL 60613
USA



"Sharon Warne"
<mattnsharon@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:03 AM

011-698

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Sharon Warne
248 Marlin Rd.
Grand Island, NY 14072
USA



"Kim Rasmussen"
<kar21863@aol.com>
12/02/2002 10:02 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-699

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Kim Rasmussen
box 177 948 George St
Mumford, NY 14511
USA



"Ken Davenport"
<davenport@neilsa.org
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:01 AM

2002-011-700

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Ken Davenport
415 Commercial St
Waterloo, IA 50701
USA



"John Coggeshall"
<john@coggeshall.org
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/01/2002 08:14 PM

2002-011-701

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

John Coggeshall
61 N Hancock
Pentwater, MI 49449
USA



"Kevin Hawkins"
<kshawkin@uiuc.edu>
12/01/2002 11:20 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-702

December 1, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kevin Hawkins
11011 Powers Ave.
Cockeysville, MD 21030
USA

011-703



OFFICE OF THE FEDERAL ENVIRONMENTAL EXECUTIVE

WHITE HOUSE TASK FORCE ON WASTE PREVENTION AND RECYCLING
1200 PENNSYLVANIA AVENUE, NW MAIL CODE 16005 WASHINGTON, DC 20460
(202) 564-1297 WWW.OFEE.GOV TASK_FORCE@OFEE.GOV

PROMOTING SUSTAINABLE ENVIRONMENTAL STEWARDSHIP THROUGHOUT THE FEDERAL GOVERNMENT

November 22, 2002

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

Re: FAR Case 2002-011, Procurement of Printing and Duplicating Through the
Government Printing Office

Dear Ms. Duarte:

Thank you for the opportunity to comment on the proposed changes to the Federal Acquisition Regulation (FAR) for the procurement of printing and duplicating services, which proposed rule would implement Office of Management and Budget Memorandum M-02-07. I write today to request that the final rule inform agency acquisition staff that the change in policy regarding printing sources has not changed the buy-recycled paper requirement.

Under section 6002 of the Resource Conservation and Recovery Act, Executive Order 13101, and FAR Section 11.303 and Subpart 23.400, federal agencies are required to purchase paper containing 30 percent postconsumer fiber, including paper used in publications printed by others. These provisions remain in effect, and OMB Memorandum M-02-07 did not change them.

To ensure that procurement staff do not become confused about the impact of OMB Memorandum M-02-07 on the continuing buy-recycled paper requirement, we request that the FAR Council revise proposed Section 8.801(b)(1) as follows (additions are underlined):
“[A]gencies shall make awards for Government printing in accordance with applicable parts of the FAR, including Parts 5, 6, 10, 11, 12, 13, 14, 15, 17 and 19 and Subparts 8.4 and 23.400.”

Thank you for your consideration of these changes. If you have any questions, please contact Ms. Dana Arnold of my staff at (202)564-9319.

Sincerely,

John L. Howard, Jr.
Federal Environmental Executive

12/2/02

011-704



"Yvonne Maute"
<ydmaute@buffalo.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:00 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Yvonne Maute
37 Park Blvd.
Lancaster, NY 14086
USA



"Rochelle Cheifetz"
<rochelle.cheifetz@km
zr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:57 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Rochelle Cheifetz
KMZ Rosenman
575 Madison Avenue
New York, NY 10022
USA

011-705



"David Bigwood"
<cbigwood@onebox.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:54 AM

011-706

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Bigwood
211 Leghrand Ct
League City, TX 77573
USA



"Brian Marick"
<marick@testing.com>
12/02/2002 09:50 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-707

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Brian Marick
913 W White St
Champaign, IL 61821
USA



"Michael LeRoy"
<mleroy@pacbell.net>

12/02/2002 09:49 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-708

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Michael LeRoy
4909 Sea Wolf Drive
Santa Rosa, CA 95409
USA



"Tracy Paradis"
<allawry@earthlink.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:49 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-709

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Tracy Paradis
598 Parkside Ave
Buffalo, NY 14216
USA



"Edward Herman"
<lolherma@acsu.buffal
o.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:45 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Edward Herman
126 Bernhardt
Amherst, NY 14226
USA

011-710



"Stephen Barbour"
<slb23@law.georgetown.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:44 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-711

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Stephen Barbour
1230 13th Street #915
Washington, DC 20005
USA



"Andrzej Imiolek"
<andrzej@revsystems.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:43 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-712

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Sincerely,

Andrzej Imiolek
17 Wilson Avenue
1st Floor
North Plainfield, NJ 07060
USA



"Nicholas Taranko"
<nick73@rochester.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:40 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Nicholas Taranko
3 Second Street
Geneseo, NY 14454
USA

011-713

December 2, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW, Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

011-714

Dear Ms. Duarte:

The National Endowment for the Arts has reviewed the proposal to amend the Federal Acquisition Regulation (FAR) regarding the procurement of printing. This rule would create an entirely new set of procurement rules exclusive to printing requirements. However, we believe existing FAR procedures are adequate to meet the stated goals of the proposed rule without establishing new rules. Our comments are based on the following.

The proposed rule states that the purpose is to “induce competition, save taxpayer money, and promote small business competition.”

To accomplish these goals, among other changes, the rule would require the synopsis of acquisitions of printing services in excess of \$2,500 (rather than in excess of \$25,000) and would limit indefinite quantity and requirements contracts to one year (rather than five years).

FAR 13.003 (b)(1) already exclusively reserves acquisitions between \$2,500 and \$100,000 for small business concerns, and under the existing FAR requirements, all contracts above \$2,500 require soliciting competitive quotations.

In addition, limiting indefinite quantity and requirements contracts for printing to one year would cause agencies to incur additional administrative costs, because of the need to resolicit, renegotiate, and reissue new contracts every year. The proposed rule does not recognize this additional staff time and cost.

Under the existing FAR, all printing contracts from \$2,500 up to \$100,000 are competitive and are awarded to small businesses. We suggest that the stated goals of the proposed rule are already addressed in the FAR, and an entirely new set of rules exclusive to procurement of printing is unnecessary.

Sincerely,

Laurence Baden
Deputy Chairman for Management & Budget



"Kelley, Sara"
<SKelley@law.umaryland.edu>

12/02/2002 09:39 AM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: Comments: FAR Case 2002-011 Federal Acquisition Regulation

011-715

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

OMB cites cost and small business opportunity as the main reasons for the change. However, in the May 6th issue of *Government Executive* magazine Ben Cooper, a representative of the Printing Industries of America, pointed out that his industry group opposed the change and supported the existing arrangement because "GPO charges fees that most printers would agree are rock-bottom" and because GPO assures in their contract process that printers throughout the country have an opportunity to procure government printing jobs. Furthermore, executive agencies will, in bypassing GPO, have to re-create the structure and staffing which GPO already has in place to coordinate printing and perform the necessary administrative functions needed to follow a printing contract through to a successful completion. It is hard to see how such duplication of effort could possibly save money.

Another area of concern is the effect that the proposed regulation will have on citizen's access to government produced information. Currently, when GPO produces an item for any Federal agency it also arranges for copies to be distributed to over 1,300 Federal Depository Libraries. The proposed regulation would mandate that one copy of any document be provided to GPO for distribution through the depository system. If a hard copy is to be provided to every participating library, then this one supplied copy must now be re-produced in print form, which would necessitate that GPO spend additional tax dollars to create enough copies to distribute. To make matters worse, one has to wonder if GPO would even get the single, mandated copy. Presently, even with government information distribution centralized at GPO, nearly 50% of all government documents are not included in the depository program (as OMB admits). It is ludicrous to suggest that distribution to libraries and users will be improved by decentralizing printing production.

Finally, I urge you to respect H.J. Res. 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Sara E. Kelley
Research Librarian
Thurgood Marshall Law Library
University of Maryland School of Law
(410) 706-0735



"Seth Grossman"
<newyset@aol.com>
12/02/2002 09:33 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-716

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Seth Grossman
Creekside Village Apartments 17FB
Buffalo, NY 14261
USA



"Brian Hoort"
<hoortbri@msu.edu>
12/02/2002 09:30 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-717

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Brian Hoort
901 Britten Ave.
Lansing, MI 48910
USA



"Jeanne Lauber"
<jlauber@ubmail.ubalt.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:27 AM

011-718

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jeanne Lauber
1420 Maryland Ave
Baltimore, MD 21201
USA



"Alex Tsalolikhin"
<atsaloli@earthlink.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:25 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Alex Tsalolikhin
420 W. Sierra Madre Blvd., Apt. #0
Sierra Madre, CA 91024
USA

011-719



"Marcia Daumen"
<daumen@buffalo.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:24 AM

011-720

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Marcia Daumen
148 St. James Place
Buffalo, NY 14222
USA



"L. Moyer"
<ljm26@drexel.edu>
12/02/2002 09:12 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-721

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

L. Moyer
711 South 4th
Philadelphia, PA 19147
USA



"Daisy Waters"
<dpwaters@acsu.buffa
lo.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:10 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Daisy Waters
Lockwood Library Building
Technical Services
Buffalo, NY 14260
USA

011-722



"Catherine Collins"
<tfortx@yahoo.com>
12/02/2002 09:07 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-723

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Catherine Collins
1316 Bonham St.
Commerce, TX 75428
USA



"Francis Kayiwa"
<kayiwa@uic.edu>
12/02/2002 09:04 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-724

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Francis Kayiwa
2710 N Troy St
Fl. 1
Chicago, IL 60647
USA



"Brooke Heaton"
<brooke_heaton@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:04 AM

011-725

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Brooke Heaton
3718 Bryant Ave. S.
Apt. 205
Minneapolis, MN 55409
USA



"Stacy Brown"
<finalword@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:03 AM

011-726

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Stacy Brown
112 Lear Rd.
Avon Lake, OH 44012
USA



"Jane Allen"
<janeallen@mac.com>
12/03/2002 08:24 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-727

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Jane Allen
44 Rendezvous Lane
Barnstable, MA 02630
USA



"Richard Coleman"
<richard_coleman@jws.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 08:14 AM

011-728

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Richard Coleman
44 Jefferson St.
Bangor, ME 04401
USA



"Laura Raccagni"
<lraccagni@lib.uconn.
edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 07:54 AM

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Laura Raccagni
139 Merline Rd.
Vernon Rockville, CT 06066
USA

011-729



"Jeffrey Bruce"
<jsbruce@ieee.org>
12/03/2002 07:25 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-730

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeffrey Bruce
471 old Francestown Road
Weare, NH 03281
USA



"Benjamin Snyder"
<bensnyder@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 07:15 AM

011-731

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Benjamin Snyder
8486 Honor Ct
Galloway, OH 43119
USA



"Jay Greenfield"
<jay_greenfield@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 07:06 AM

011-732

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Sincerely,

Jay Greenfield
2456 20th St. NW
Washington, DC 20009
USA



"Randy Gilleland"
<randy@dreampath.net>
t>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 06:57 AM

011-733

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Randy Gilleland
123 Berry St
Statesville, NC 28677
USA



"Earl G Bley Jr"
<Earl.Bley@mindspring.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 06:38 AM

011-734

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Earl G Bley Jr
1880A Carnation Ct
Aurora, IL 60506
USA



"Steve Wendt"
<steve@shocking.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 04:05 AM

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Steve Wendt
1749 Eaton Rd. #61
Chico, CA 95973
USA

011-735



"Kirk Sefchik"
<doomgazebugus@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 03:14 AM

011-736

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kirk Sefchik
1779 Krucker Road
Hamilton, OH 45013
USA



"Andrea Burke"
<astory@telestream.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 02:19 AM

011-737

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Andrea Burke
10700 SW 35th
Portland, OR 97219
USA



"David Lepore"
<eropel@attbi.com>

12/03/2002 01:46 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-738

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Lepore
4639 N Defiance St
Tacoma, WA 98407
USA



"Stephen Dulaney"
<Steve@dulaney.biz>

12/03/2002 01:35 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-739

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Stephen Dulaney
2210 Brim Ct.
Grand Prairie, TX 75052
USA



"Rusty Tab Jr."
<tnedutshied@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 01:32 AM

011-740

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Rusty Tab Jr.
5 S. Canal St.
Greene, NY 13778
USA



"Sue Aschim"
<starlilysue@netscape.
net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 01:06 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-741

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

I manage an in-house print shop for a local Community College. The printing industry is another boom and bust industry, with very expensive high-end producers and very poor, cheap and cut-throat producers. Neither of these types of business will allow the centralized access to information that the GPO does now.

I'm also working on a Masters of Public Affairs degree with a focus on policy development. Part of the research for my current Business Ethics class has taken me hours of fruitless searching until I searched the GPO web site and found the employment law citation I was seeking.

As a printshop manager with a mandate to charge for my expenses to the departments I print for, I can assure you that the GPO is the granddaddy of all in-house printshops and a model for efficiency and effectiveness. I've spent about 15 years learning the art and language of printing, and printing is not easy for an amateur to learn. The quickness and carelessness of our internet practices are exactly the wrong mode for thinking about the archives of government information that need to be available to the public in both printed and digital form. The GPO has effectively married digital and print technology and distributing that responsibility to randomly selected government workers whose primary responsibility has nothing to do with printing would be a damaging move for every citizen.

As for those who think that the GPO is a printing monopoly, I beg to differ. Anyone who can meet the standards of the GPO printing requirements can bid on GPO jobs and get a share of the business so to speak. These print jobs are not for the faint of heart in volume, complexity or required quality.

Thank you for taking my concerns into consideration.

Sincerely,

Sue Aschim
610 W 40th St
Vancouver, WA 98660
USA



"David Rice"
<d.rice@vanderbilt.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 01:00 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

David Rice
Vanderbilt University
Nashville, TN 37205
USA

011-742



"Justin Gosling"
<thenexthour@hotmail
.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 12:53 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Justin Gosling
2411 Ashby Ave
Berkeley, CA 94705
USA

011-743



"Darren Kosinski"
<dkosinski@iname.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 12:50 AM

011-744

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

By having the GPO as the central clearinghouse for all government printing, it helps to keep public documents easily accessible. I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, including small print shops for the majority of their work. I highly doubt that removing this organizational layer will cut costs.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Darren Kosinski
4554 Waterville Dr.
San Jose, CA 95118
USA



"Remy Fiorentino"
<rfioren@yahoo.com>
12/03/2002 12:20 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-745

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Remy Fiorentino
1611 Springdale Rd
Cherry Hill, NJ 08003
USA



"Brian Mueller"
<biker8448@sbcglobal.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 12:07 AM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Brian Mueller
4601 Lonedell Rd.
Arnold, MO 63010
USA

011-746



"Noah Gauthier"
<noahgauthier@charte
rmi.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 11:58 PM

011-747

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Noah Gauthier
815 East A Street
Iron Mountain, MI 49801
USA



"Christian Prine"
<ftourist@yahoo.com>
12/02/2002 11:35 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

-011-748

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Christian Prine
20 Brook Rd
Amherst, NH 03031
USA



"Craig Myers"
<craigwmyers@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 11:35 PM

011-749

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Craig Myers
3219 15th Ave. So.
Minneapolis, MN 55407
USA



"Khatun Hollenberg"
<hollenk@excite.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 11:14 PM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-750

Dear FAR Board ,

I am writing with concern about the FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I implore you to reject the OMB proposal and keep the very important GPO at the center of the Federal printing process.

I am sure you know that the GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am very concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this small organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I would like to urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which strongly condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Khatun Hollenberg
1619 Mallard Dr
Denton, TX 76210
USA



"Blake Hutchinson"
<BKHutchinson@acm.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:57 PM

011-751

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Blake Hutchinson
N116W12738 Elm Lane
Germantown, WI 53022
USA



"Tom Stave"
<tstave@oregon.uoreg
on.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:51 PM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Tom Stave
2250 Cleveland
Eugene, OR 97405
USA

011-752



"Bryant Johnson"
<technotimber1@earth
link.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:45 PM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Bryant Johnson
4109 Longfellow Drive
Plant City, FL 33566
USA

011-753



"Richard Rodrigues"
<richardrodrigues@jun
o.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 10:12 PM

011-754

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the newest OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing and is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and certainly do not always do so in a timely manner. I am extremely concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination, thus providing an extreme bureaucratic challenge to the democratic processes of giving U.S. citizens access to the records and materials generated by their government, all of which is of course paid for by U.S. taxpayers!

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time. I would appreciate

hearing from you or your staff on this matter.

Sincerely,

Richard Rodrigues
856 Lincoln St Apt 4
Eugene, OR 97401
USA



"Buck Sherman"
<sherman@shermanbuck.com>

12/02/2002 10:05 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-755

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Buck Sherman
804 32nd St #4
Bellingham, WA 98225
USA



"Jonathan Bonebrake"
<ja_bone@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:57 PM

011-756

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Jonathan Bonebrake
University at Buffalo
Buffalo, NY 14214
USA



"John Martinez"
<jvm@snarkhunter.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:32 PM

011-757

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

John Martinez
445 Hembree Hollow
Roswell, GA 30076
USA



"Deane Roppe"
<deaneror@charter.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 09:01 PM

011-758

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Deane Roppe
15887 HWY 101 S.
Harbor, OR 97415
USA



"Brian Putnam"
<bcp62@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>

cc:

Subject: I Oppose FAR Case 2002-011

12/02/2002 08:29 PM

Rec'd. 1st

2nd

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-759

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Brian Putnam
2816 Weston Dr
Denton, TX 76209
USA



"Ernarosa Tominich"
<ernarosa@yahoo.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 08:23 PM

011-160

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Ernarosa Tominich
3342 Stony Pt. Rd.
Grand Island, NY 14072
USA



"Nydia Gutowski"
<gutov@msn.com>

12/02/2002 08:11 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Nydia Gutowski
60 Burke Drive
Lackawanna, NY 14218
USA

011-761



"dan hoal"
<haller47@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/02/2002 08:06 PM

011-762

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

dan hoal
6108 hazelhurst place
North Hollywood, CA 91606
USA



"Bruno Melninkaitis"
<Filofax@snet.net>
12/02/2002 07:58 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-763

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Bruno Melninkaitis
436 Farmwood Rd
Waterbury, CT 06704
USA



"Kelly Mullaney"
<km25lis@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 07:51 PM

011-764

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Kelly Mullaney
342 Applewood Drive
Lockport, NY 14094
USA



"Andrew David"
<genex69@hotmail.co
m>

12/02/2002 07:45 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-765

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Andrew David
7300 Bristol Village Dr. #109
Bloomington, MN 55438
USA



"Mark Chase"
<mark_r_chase@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 07:31 PM

011-766

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Mark Chase
12321 Route 322
South Dayton, NY 14138
USA



"John Ellery"
<Pokiehl@hotmail.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 07:27 PM

011-767

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Ellery
1 Spruce Ln
Brunswick, ME 04011
USA



"Daryll Strauss"
<daryll@harlot.rb.ca.us
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 07:24 PM

011-768

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Daryll Strauss
2607 Nelson Ave
Unit G
Redondo Beach, CA 90278
USA



"Michael Boyle"
<MBoyle@cableaz.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 07:14 PM

011-769

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Boyle
2446 E Hope St
Mesa, AZ 85213
USA



"Frank Landrum"
<fwlandrum@aol.com>

12/02/2002 07:08 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-770

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Frank Landrum
2635 E. Wilshire Drive
Eugene, OR 97405
USA



"Susan Maclean"
<smaclean@acsu.buff
alo.edu>

12/02/2002 07:06 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-771

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Susan Maclean
5775 Sheridan Dr.
Williamsville, NY 14221
USA



"Troy Gladhill"
<tagladhill@msn.com>

12/02/2002 07:01 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-772

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Troy Gladhill
9407 Ernest Drive
Frederick, MD 21704
USA



"Lawrence Wiseman"
<cheesethegreat@yah
oo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 07:00 PM

011-993

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Lawrence Wiseman
7055 Hickory Ln
Gates Mills, OH 44040
USA



"Jaime Schulte"
<jasch0328@adelphia.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 06:53 PM

011-794

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jaime Schulte
3 South Seine Drive
Cheektowaga, NY 14227
USA



"Robert Sorensen"
<robert_sorensen@yahoo.com>

12/02/2002 06:16 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-775

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Robert Sorensen
3008 Pierce St
San Francisco, CA 94123
USA



"Joe Carmihcael"
<joe@carmichael.net>

12/02/2002 06:10 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-776

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Joe Carmihcael
1023 McKinley Ave
Auburn, AL 36830
USA



"Maryalice Kilbourne"
<kkilbourne1@stny.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/02/2002 05:50 PM

011-777

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Maryalice Kilbourne
20 East Lake Road
Cohocton, NY 14826
USA



"Susan Lewis-Somers"
<slewis@wcl.american
.edu>

12/02/2002 05:47 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: Comment on FAR Case 2002-011

011-778

To the members of the FAR Council:

I am writing to express my concern over the OMB proposal to farm out executive branch agency printing to private sector printers, work that has previously been done by the Government Printing Office.

My concern has to do with public access to government documents. The GPO distributes government publications to hundreds of depository libraries around the country via the Depository Library Program. This ensures that the public will have free access to the working documents of the federal government at their local libraries, whether they are in Missoula, Montana or in Washington, DC.

There is nothing in the new OMB proposal to really compel federal agencies to send to the GPO copies of their outsourced agency documents, so that the GPO may reproduce and distribute them to depository libraries for public use. There is no mechanism to enforce agency compliance with this supposed requirement and no sanctions for agencies who ignore it.

We have already seen agency noncompliance in recent years with the requirement to provide the GPO with copies of documents that they sometimes farm out to outside printers. There is no incentive for agencies to also send copies of such documents to the GPO for distribution via the Depository Library Program. This problem is sure to mushroom if agencies are compelled to farm out their printing.

Unfortunately, it will be the public who will be denied access to the many agency documents that are still not available via the Internet or more usable in paper, such as the U.S. Code. The reality is that when the GPO prints government documents, they are sure to be distributed to the public via depository libraries. But when they are farmed out to private printers, they tend not to also be sent to the GPO and on to depository libraries.

There is very little assurance in the OMB proposal, based on the past practice of private printing, that these agency documents will be forwarded to the GPO and every reason to fear that the public will lose access to the documents of the federal government because of this misguided proposal.

I urge the FAR Council to reject the OMB proposal to require executive branch agencies to outsource their printing to private printers. Instead, I urge that the Council continue to require that they send their agency documents to the GPO for printing and distribution to libraries via the Federal Depository Program.

Susan Lewis-Somers
Senior Reference and Educational Services Librarian

American University, Washington College of Law Library
4801 Massachusetts Ave. NW
Washington, DC 20016-8087

slewis@wcl.american.edu
(202) 274-4330 fax-(202) 274-4365

011-778



"Carl Marshall"
<zothommog@operamail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 05:32 PM

011-779

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Carl Marshall
249 Warrior Road
Madison, TN 37115
USA



"charles schmidt"
<k4rbv@aol.com>

12/02/2002 05:31 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-780

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

charles schmidt
22 joseph st
New Hyde Park, NY 11040
USA



"Anne Grady"

<agrady@massbay.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>

cc:

Subject: I Oppose FAR Case 2002-011

12/02/2002 05:22 PM

011-781

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Anne Grady
6 Drury Ln
Natick, MA 01760
USA



"Wendy Mann"
<wendym@pitt.edu>
12/02/2002 05:13 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-782

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Wendy Mann
University of Pittsburgh
G-8 Hillman Library
Pittsburgh, PA 15260
USA



"Apgood, Rick"
<rapgood@udc.edu>
12/02/2002 04:57 PM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: FAR Case 2002-011

011-783

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

OMB cites cost and small business opportunity as the main reasons for the change. However, in the May 6th issue of Government Executive magazine Ben Cooper, a representative of the Printing Industries of America, pointed out that his industry group opposed the change and supported the existing arrangement because "GPO charges fees that most printers would agree are rock-bottom" and because GPO assures in their contract process that printers throughout the country have an opportunity to procure government printing jobs. Furthermore, executive agencies will, in bypassing GPO, have to re-create the structure and staffing which GPO already has in place to coordinate printing and perform the necessary administrative functions needed to follow a printing contract through to a successful completion. It is hard to see how such duplication of effort could possibly save money. Another area of concern is the effect that the proposed regulation will have on citizen's access to government produced information. Currently, when GPO produces an item for any Federal agency it also arranges for copies to be distributed to over 1,300 Federal Depository Libraries. The proposed regulation would mandate that one copy of any document be provided to GPO for distribution through the depository system. If a hard copy is to be provided to every participating library, then this one supplied copy must now be re-produced in print form, which would necessitate that GPO spend additional tax dollars to create enough copies to distribute. To make matters worse, one has to wonder if GPO would even get the single, mandated copy. Presently, even with government information distribution centralized at GPO, nearly 50% of all government documents are not included in the depository program (as OMB admits). It is ludicrous to suggest that distribution to libraries and users will be improved by decentralizing printing production.

Finally, I urge you to respect H.J. Res. 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Rick Apgood, JD, MLIS
Reference Librarian
UDC-David A. Clarke School of Law
202-274-7355



"Gail Fithian"
<dhollender@attbi.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 04:59 PM

011-784

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Gail Fithian
1 Tannery Brook Row No. 1 F
Somerville, MA 02144
USA



"David Hollender"
<dhollender@attbi.com>

12/02/2002 04:58 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-785

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Hollender
1 Tannery Brook Row No. 1 F
Somerville, MA 02144
USA



"Kristi Dickey"
<starlight01@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 04:57 PM

011-786

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kristi Dickey
625 Chase Hammock Road
Merritt Island, FL 32953
USA



"Robert Curtis"
<rgcurtis@netzero.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 04:46 PM

011-787

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Curtis
1486 Groveland Ave NW
Atlanta, GA 30309
USA



"Marx Rivera"
<marx@nyct.net>

12/02/2002 04:38 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-788

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Marx Rivera
104-66 126th street
South Richmond Hill, NY 11419
USA



"David Rhoten"
<dbrhoten@sjcf.com>
12/02/2002 04:29 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-789

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Rhoten
243 South Old Manor Rd
Wichita, KS 67218
USA



"Alex Pasternak"
<erasmus@flashmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 04:28 PM

011-790

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Alex Pasternak
11510 Olde Gate Dr. E
Cincinnati, OH 45246
USA



"Howard Davidson"
<hld@sun.com>
12/02/2002 04:20 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-791

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Howard Davidson
59 Club Drive
San Carlos, CA 94070
USA



"John Homer"
<joho0@yahoo.com>
12/02/2002 04:19 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-192

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Homer
482 N Pin Oak Pl
Apt 302
Longwood, FL 32779
USA



"Cushing Whitney"
<cushing@bitlathe.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 04:13 PM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Cushing Whitney
397 River Street
Chester, VT 05143
USA

011-793



"Joan Thomas"
<jthomas@pswlaw.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 03:53 PM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-794

Dear FAR Board ,

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Sincerely,

Joan Thomas
7514 Terrace St.
Kansas City, MO 64114
USA



"Craig Wheeler"
<craig_wheeler@tamu-
commerce.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 03:39 PM

011-795

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Craig Wheeler
1702 Bois d'Arc Apt. 03
Commerce, TX 75428
USA



"Richard West"
<rw88@cornell.edu>
12/02/2002 03:38 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-796

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Richard West
236 Hidden Oaks Dr
Colchester, VT 05446
USA



"Karel Baloun"
<kbaloun@looksmart.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 03:32 PM

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Karel Baloun
691 Sonoma St
Richmond, CA 94805
USA

011-797



"Gordon Fischer"
<fischer@sarken.org>
12/02/2002 03:23 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-798

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Gordon Fischer
5700 Tapadera Trace Ln
Apt 1037
Austin, TX 78727
USA



"William Bennett"
<wmbennett@bennett-
group.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 03:20 PM

011-799

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

William Bennett
9 Summit Dr
Atkinson, NH 03811
USA



"Jeffrey VanGundy"
<jvangund@satx.rr.com>

12/02/2002 03:18 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

2002-011-800

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeffrey VanGundy
2909 White Pine Dr
Schertz, TX 78154
USA



"Kevin Tuohey"
<kevt50t@yahoo.com>
12/02/2002 03:18 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-801

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kevin Tuohey
135 Olive Street
Huntington Station, NY 11746
USA



"Matthew Zavislak"
<zavislak@uiuc.edu>
12/02/2002 03:18 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

0 11-802

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Matthew Zavislak
602 S. Race St.
Apt. 2
Urbana, IL 61801
USA



"James O'Shea"
<james_oshea@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 03:18 PM

011-803

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and fortunately, they were unsuccessful.

Please do not allow the OMB to bypass the will of our elected representatives. Thank you for your time.

Sincerely,

James O'Shea
2187 Carlmont Dr
#19
Belmont, CA 94002
USA



"Sarah Dentan"
<sdentan@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 03:11 PM

011-804

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Sarah Dentan
820 Oxford Street
Berkeley, CA 94707
USA



"Robert Doiel"
<rsdoiel@usc.edu>
12/02/2002 03:09 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-805

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Doiel
21136 Alaminos Dr
Santa Clarita, CA 91350
USA



"Clarissa Smith Smith"
<claris@stanford.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/02/2002 02:59 PM

011-806

December 2, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Clarissa Smith Smith
39663 Leslie St., Apt. 294
Fremont, CA 94538
USA



"Pat Court"
<pgc1@cornell.edu>
12/03/2002 08:51 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-809

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Pat Court
359 Myron Taylor Hall
Cornell Law School
Ithaca, NY 14853
USA



"Robert Epp"
<bob_epp@hotmail.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 09:06 AM

011-808

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Epp
7716 Kessler Ln.
Overland Park, KS 66204
USA



"Nancy Moore"
<njm5@cornell.edu>
12/03/2002 09:06 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-809

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Nancy Moore
380 Teton Ct.
Ithaca, NY 14850
USA



"Ryan Redding"
<reddmann35@insight
bb.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 09:08 AM

011-810

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ryan Redding
3021 Vinton Cir
Kokomo, IN 46902
USA



"knud jensen"
<knud1@bigpond.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 09:11 AM

011-811

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

knud jensen
7/9 beacham place
medina, 6167
Australia



MSroczynski@milbank.
com
12/03/2002 09:38 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: Comments: FAR Case 2002-011

011-812

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

OMB cites cost and small business opportunity as the main reasons for the change. However, in the May 6th issue of *Government Executive* magazine Ben Cooper, a representative of the Printing Industries of America, pointed out that his industry group opposed the change and supported the existing arrangement because "GPO charges fees that most printers would agree are rock-bottom" and because GPO assures in their contract process that printers throughout the country have an opportunity to procure government printing jobs. Furthermore, executive agencies will, in bypassing GPO, have to re-create the structure and staffing which GPO already has in place to coordinate printing and perform the necessary administrative functions needed to follow a printing contract through to a successful completion. It is hard to see how such duplication of effort could possibly save money.

Another area of concern is the effect that the proposed regulation will have on citizen's access to government produced information. Currently, when GPO produces an item for any Federal agency it also arranges for copies to be distributed to over 1,300 Federal Depository Libraries. The proposed regulation would mandate that one copy of any document be provided to GPO for distribution through the depository system. If a hard copy is to be provided to every participating library, then this one supplied copy must now be re-produced in print form, which would necessitate that GPO spend additional tax dollars to create enough copies to distribute. To make matters worse, one has to wonder if GPO would even get the single, mandated copy. Presently, even with government information distribution centralized at GPO, nearly 50% of all government documents are not included in the depository program (as OMB admits). It is ludicrous to suggest that distribution to libraries and users will be improved by decentralizing printing production.

Finally, I urge you to respect H.J. Res. 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Marijah Sroczynski

Milbank Tweed Hadley & McCloy LLP
Marijah Sroczynski
Technical Services Librarian
1 Chase Manhattan Plaza
48th Floor Library
New York, NY 10005-1413
T: 212-530-5207 F: 212-530-5219
msroczynski@milbank.com
www.milbank.com/library



"Frances O'Dell"
<sfodell@yahoo.com>
12/03/2002 09:38 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-813

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Frances O'Dell
11525 NE 2nd Ave
Villa 33
Miami, FL 33161
USA



"Barbara Glover"
<barbglover@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 09:42 AM

011-814

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Barbara Glover
404 West Main St.
Northville, MI 48167
USA



"Cindy Konovitz"
<Cfk@buffalo.edu>
12/03/2002 09:43 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-815

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Cindy Konovitz
265 San Fernando Lane
East Amherst, NY 14051
USA



"Allen Corben"
<acorben@fuller.edu>
12/03/2002 02:30 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-816

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Allen Corben
65 S Roosevelt Av
Pasadena, CA 91107
USA



"Liberte Reinke"
<LiberteR@webtv.net>
12/03/2002 02:28 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-817

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Liberte Reinke
846 Yuba Street
Redding, CA 96001
USA



"Rebecca Malin"
<rdmalin@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 02:20 PM

011-818

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Rebecca Malin
101 Hazeltine Circle
Pleasant Hill, CA 94523
USA



"Joan Bueter"
<jbueter@mail.barry.ed
u>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 02:09 PM

011-819

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joan Bueter
701 N 66 Ter
Hollywood, FL 33024
USA



"Patrick McKee"
<pjm@pjmckee.com>
12/03/2002 02:00 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-820

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Patrick McKee
3955 Arrowood Lane N.
Plymouth, MN 55441
USA



"Nancie Mc Bride"
<njm4@cornell.edu>
12/03/2002 02:00 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-821

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Nancie Mc Bride
243 Jersey Hill Rd.
Ithaca, NY 14850
USA



"Mark Holman"
<worksforjava@yahoo.com>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

12/03/2002 01:51 PM

011-822

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

OMB cites cost and small business opportunity as the main reasons for the change.

However, in the May 6th issue of Government Executive magazine Ben Cooper, a representative of the Printing Industries of America, pointed out that his industry group opposed the change and supported the existing arrangement because

"GPO charges fees that most printers would agree are rock-bottom" and because GPO

assures in their contract process that printers throughout the country have an opportunity to procure government printing jobs. Furthermore, executive agencies

will, in bypassing GPO, have to re-create the structure and staffing which GPO already has in place to coordinate printing and perform the necessary administrative functions needed to follow a printing contract through to a successful completion. It is hard to see how such duplication of effort could possibly save money.

Another area of concern is the effect that the proposed regulation will have on

citizen's access to government produced information. Currently, when GPO produces

an item for any Federal agency it also arranges for copies to be distributed to

over 1,300 Federal Depository Libraries. The proposed regulation would mandate that one copy of any document be provided to GPO for distribution through the depository system. If a hard copy is to be provided to every participating library, then this one supplied copy must now be re-produced in print form, which

would necessitate that GPO spend additional tax dollars to create enough copies

to distribute. To make matters worse, one has to wonder if GPO would even get the

single, mandated copy. Presently, even with government information distribution

centralized at GPO, nearly 50% of all government documents are not included in the depository program (as OMB admits). It is ludicrous to suggest that distribution to libraries and users will be improved by decentralizing printing production.

Finally, I urge you to respect H.J. Res. 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted.

Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Mark Holman, MLS
13355 US Hwy 183, #926
Austin, TX 78750



"Monica Irlbacher"
<mirlbach@rcls.org>
12/03/2002 01:45 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-823

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Monica Irlbacher
2 Prospect Ave.
Middletown, NY 10940
USA



"Christine Gladish"
<cgladis@calstatela.ed
u>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 01:21 PM

011-824

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Christine Gladish
3061 Chadwick Drive
Los Angeles, CA 90032
USA



"Florence Dollard"
<mpdollard@aol.com>
12/03/2002 01:13 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-825

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Florence Dollard
2133 Staley Road
Grand Island, NY 14072
USA



"Adam Key"
<akey@austin.rr.com>
12/03/2002 01:08 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-826

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Adam Key
9413 Sanford Dr
Austin, TX 78748
USA



"Joshua Lubarr"
<josh_lubarr@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/03/2002 03:17 PM

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joshua Lubarr
30 Oakland Street
Melrose, MA 02176
USA

011-827



"Don Fessenden III"
<don.fessenden@stell
ent.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 12:39 PM

011-828

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Don Fessenden III
3252 N. Kenmore
#204
Chicago, IL 60657
USA



"Joseph Hernandez"
<jehernan@mtu.edu>
12/03/2002 12:19 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-829

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joseph Hernandez
910 lakeshore dr
apt 20
Houghton, MI 49931
USA



"Sheila Sullivan"
<SSullivan@HabeebAr
ch.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 12:13 PM

011-830

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Sheila Sullivan
23 Fairmount Way
Hull, MA 02045
USA



"Rita Moss"
<moss@refstaff.lib.unc.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 11:52 AM

011-831

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Rita Moss
104 Quail Roost Drive
Carrboro, NC 27510
USA



"Oliver Dickerson"
<dickersonod@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 11:37 AM

011-832

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Oliver Dickerson
4-74 48th Avenue #10A
Long Island City, NY 11109
USA



"Judy Reynolds"
<judyr@email.sjsu.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 11:35 AM

011-833

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Judy Reynolds
2435 Cottle Ave
San Jose, CA 95125
USA



"David Lee"
<eff@dipweb.com>

12/03/2002 11:18 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-834

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Lee
166 Duranzo Aisle
Irvine, CA 92606
USA



"Laura Bowser"
<elwing@elwing.org>
12/03/2002 11:13 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-835

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Laura Bowser
88 E West Dr
Pittsburgh, PA 15237
USA



"Susan Kendall"
<susan.kendall@sjsu.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 11:11 AM

011-836

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Susan Kendall
1750 Stokes St. #77
San Jose, CA 95126
USA



dlhodge@umich.edu
Sent by:
dlhodge@species.imap.i
td.umich.edu

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

011-837

12/03/2002 11:01 AM

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

OMB cites cost and small business opportunity as the main reasons for the change. However, in the May 6th issue of Government Executive magazine Ben Cooper, a representative of the Printing Industries of America, pointed out that his industry group opposed the change and supported the existing arrangement because "GPO charges fees that most printers would agree are "rock-bottom" and because GPO assures in their contract process that printers throughout the country have an opportunity to procure government printing jobs. Furthermore, executive agencies will, in bypassing GPO, have to re-create the structure and staffing which GPO already has in place to coordinate printing and perform the necessary administrative functions needed to follow a printing contract through to a successful completion. It is hard to see how such duplication of effort could possibly save money.

Another area of concern is the effect that the proposed regulation will have on citizen's access to government produced information. Currently, when GPO produces an item for any Federal agency it also arranges for copies to be distributed to over 1,300 Federal Depository Libraries. The proposed regulation would mandate that one copy of any document be provided to GPO for distribution through the depository system. If a hard copy is to be provided to every participating library, then this one supplied copy must now be re-produced in print form, which would necessitate that GPO spend additional tax dollars to create enough copies to distribute.

To make matters worse, one has to wonder if GPO would even get the single, mandated copy. Presently, even with government information distribution centralized at GPO, nearly 50% of all government documents are not included in the depository program (as OMB admits). It is ludicrous to suggest that distribution to libraries and users will be improved by decentralizing printing production.

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Sincerely,

Donna Hodge
Reference Librarian
Hatcher Graduate Library
University of Michigan
Ann Arbor, MI 48103



"Kenneth Aydlott"
<kena@coastal.com>
12/03/2002 10:23 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-838

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kenneth Aydlott
108 Hull St
Newport News, VA 23601
USA



"Jessica Hensley"
<luxlis@msn.com>

12/03/2002 10:17 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-839

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Jessica Hensley
417 E. Clay
Valley Center, KS 67147
USA



"Randy Deninno"
<rdeninno@wynedge.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 10:17 AM

011-840

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Randy Deninno
12746 Adeline Way
Rogers, MN 55374
USA



"Stephen Galla"
<sgalla@semtribe.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 10:07 AM

011-841

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Stephen Galla
4940 SW 32nd Ave
Fort Lauderdale, FL 33312
USA



"Michelle Zafron"
<mlzafron@acsu.buffal
o.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 10:07 AM

011-842

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Michelle Zafron
434 Grover Cleveland Hwy
Amherst, NY 14226
USA



Henry.Gozdz@judiciary
.state.nj.us

12/03/2002 09:56 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: Please reject the OMB proposal

011-843

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

OMB cites cost and small business opportunity as the main reasons for the change. However, in the May 6th issue of *Government Executive* magazine Ben Cooper, a representative of the Printing Industries of America, pointed out that his industry group opposed the change and supported the existing arrangement because "GPO charges fees that most printers would agree are rock-bottom" and because GPO assures in their contract process that printers throughout the country have an opportunity to procure government printing jobs. Furthermore, executive agencies will, in bypassing GPO, have to re-create the structure and staffing which GPO already has in place to coordinate printing and perform the necessary administrative functions needed to follow a printing contract through to a successful completion. It is hard to see how such duplication of effort could possibly save money.

Another area of concern is the effect that the proposed regulation will have on citizen's access to government produced information. Currently, when GPO produces an item for any Federal agency it also arranges for copies to be distributed to over 1,300 Federal Depository Libraries. The proposed regulation would mandate that one copy of any document be provided to GPO for distribution through the depository system. If a hard copy is to be provided to every participating library, then this one supplied copy must now be re-produced in print form, which would necessitate that GPO spend additional tax dollars to create enough copies to distribute. To make matters worse, one has to wonder if GPO would even get the single, mandated copy. Presently, even with government information distribution centralized at GPO, nearly 50% of all government documents are not included in the depository program (as OMB admits). It is ludicrous to suggest that distribution to libraries and users will be improved by decentralizing printing production.

Finally, I urge you to respect H.J. Res. 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Henry Gozdz
Law Librarian
Superior Court of New Jersey, Bergen Vicinage
201 646 2056



"Jeff Clark"
<clarkjc@jmu.edu>
12/03/2002 09:50 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-844

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

Being a member of the higher education library community in Virginia, I know the critical importance that availability of and access to government documents has for our public life and discourse. Meeting this need should remain fully a responsibility of our central government agencies such as the GPO, and should not be jeopardized for benefits that are questionable both in size and even in fact.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Jeff Clark
271 Inglewood Court
Mc Gaheysville, VA 22840
USA



"Robert Mykoff"
<elicit@cox-internet.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 04:09 AM

011-845

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Robert Mykoff
1227 South Hampton Dr.
Alexandria, LA 71303
USA



"Daniel Copeland"
<dpc-effac@turophile.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 03:19 AM

011-846

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Daniel Copeland
2 Vulcan Stairway
San Francisco, CA 94114
USA



"Matthew Klein"
<mklein@nmedia.net>

12/04/2002 01:36 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-847

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Matthew Klein
675 NE Bellevue St
#508
Bend, OR 97701
USA



"Yannick Rendu"
<renduy@yahoo.com>
12/04/2002 12:19 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-848

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Yannick Rendu
1108 Elysian Field Dr #E
Lafayette, CO 80026
USA



"John Davenport"
<Flockmeal@cox.net>
12/03/2002 11:59 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-849

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Davenport
1304 Sir Richard Ct
Virginia Beach, VA 23455
USA



"Daniel McCarley"
<blackhawk@insectoid
hq.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 11:30 PM

011-850

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Daniel McCarley
4730 Widgeon Way
Cumming, GA 30040
USA



"Black Hawk"
<blackhawk@insectoid
hq.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 11:29 PM

011-851

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Black Hawk
4730 Widgeon Way
Cumming, GA 30040
USA



"Harry Hickey"
<harry@crescentsyste
ms.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 11:22 PM

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Harry Hickey
6712 N. Maplewood
Chicago, IL 60645
USA

011-852



"Abigail Plumb"
<libronaut@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 11:07 PM

011-853

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing to urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

The number of fugitive documents is high enough. At this crucial time in our nation's history, surely there is good reason to increase, rather than decrease, the centralized, efficient dissemination of government information.

Since the GPO already outsources a significant portion of its work, I cannot see the practical good in forcing it to compete in the market, thereby creating total documents anarchy. How does this serve democracy?

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break with over 140 years of tradition. Thank you for your time.

Sincerely,

Abigail Plumb
560 Riverside Dr
#8M
New York, NY 10027
USA



"Sam Seeley"
<seeley@dslextrême.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 09:53 PM

011-854

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Sam Seeley
15075 Danielle Way
Lake Elsinore, CA 92530
USA



"K. Martin Stevenson"
<kmartin.stevenson@verizon.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 09:24 PM

011-855

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

With regard to FAR Case 2002-011, I urge you to reject the Office of Management and Budget proposal. The Government Printing Office should remain at the center of the Federal printing process.

This is especially important because GPO, as manager of government printing, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. Decentralizing the printing process would threaten orderly and reliable dissemination.

GPO currently acts as a clearinghouse for printing, using thousands of private contractors throughout the nation. If the GPO is removed it will have to be replaced by some agency capable of oversight and orderly dissemination.

Thus, if the same quality of service is to be maintained, cost savings are not likely to be realized.

Similar attempts, in 1987 and 1994, have already been beaten back. Congress, in HJ Res 122, recently has expressed its clear opposition. Privatization of traditional government functions has almost always resulted in degraded service at increased cost. The profit motive, coupled with ineffective government oversight, make privatization a poor bargain.

Please do not overturn 140 years of effective performance. Thank you for your consideration.

Sincerely,

K. Martin Stevenson
845 Norma Way
Santa Barbara, CA 93111
USA



"George Gilsinan"
<georges@batnet.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 08:55 PM

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

George Gilsinan
3534 Oak Knoll Dr
Redwood City, CA 94062
USA

011-856



"Calvin Smith"
<exnihilo@myrealbox.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 08:47 PM

011-837

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Calvin Smith
2146 Sacramento St Apt 7
Berkeley, CA 94702
USA



"Marylaine Block"
<mblock@netexpress.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 08:37 PM

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Marylaine Block
214 Pershing Ct.
Davenport, IA 52803
USA

011-258



"Cheryl Nabati"
<cherylnabati@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 08:36 PM

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Cheryl Nabati
4880 Millersport Hwy
East Amherst, NY 14051
USA

011-859



"Robert Dale"
<rob@nrek.net>

12/03/2002 08:20 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-860

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Dale
204 Steep Bank Dr
Cary, NC 27511
USA



"Brian Haynes"
<deus777@earthling.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 08:17 PM

011-861

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Brian Haynes
1703 Sheridan St
Oshkosh, WI 54901
USA



"Robert Smith"
<spartyrb@ripco.com>
12/03/2002 07:42 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-862

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Smith
926 Manchester St
Cary, IL 60013
USA



"Gene McNay"
<happygene@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 07:34 PM

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Gene McNay
1945 Park Valley Dr
Columbus, IN 47203
USA

011-863



"George Klopf"
<winoman2@adelphia.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 07:29 PM

011-864

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

George Klopf
661 Marjorie Mae St
State College, PA 16803
USA



"Rachel Bode"
<bode@konami.com>
12/03/2002 07:09 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-865

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Rachel Bode
24 Rolling Hills Ave
San Mateo, CA 94403
USA



"Jeffrey Palmer"
<jeffrey.palmer@acm.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 07:03 PM

011-866

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jeffrey Palmer
2720 N Southport Ave # B
Chicago, IL 60614
USA



"Jacqueline Paynter"
<jackipaynter@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 06:36 PM

011-867

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jacqueline Paynter
78 Buchanan Street, #101
San Francisco, CA 94102
USA



"Nicholas Minton"
<phreak_nick@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 06:10 PM

011-868

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Nicholas Minton
120 W. Juliana Way
Auburndale, FL 33823
USA



"Audrey Koscielniak"
<kosc@buffalo.edu>
12/03/2002 04:53 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-869

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Audrey Koscielniak
24 N. Prince Drive
Depew, NY 14043
USA



"Paul-Alexander
Crystal"
<pc402@columbia.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/03/2002 04:21 PM

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Paul-Alexander Crystal
111 East 26th
New York, NY 10010
USA

011-870



"Young, Kathryn C.
PHD"
<Kathryn.Young@lrn.v
a.gov>

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: Comment on GPO requirements

12/03/2002 04:16 PM

011-871

I hope the proposed loosening of restrictions will be passed. I have worked for Dept. of Veterans Affairs for 24 years, and I have had both good and bad experiences with GPO. On balance, though, it seems that the requirement to use GPO has caused undue delays and poor quality. The most memorable example was a job for wallet cards with the Mission/Vision/Values on one side and a logo on the other, for our TQI efforts. The logo was noticeably off-center, but we were told that it was "within the government specifications" and therefore would not be corrected. In other words, "good enough for government work." That's not acceptable customer service, in my eyes. Thank you.

Kathryn C. Young, Ph.D.
Managing Director, Cleveland EERC
(440) 526-3030, x6648



"Norman Karlow"
<nkarlow@msn.com>
12/03/2002 03:02 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-872

December 3, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Norman Karlow
5185 Heatherton Lane
Riverside, CA 92505
USA



"Jeffrey Stults"
<StultsJ@ntldr.net>
12/04/2002 06:08 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-873

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeffrey Stults
3064 Benton Street
West Lafayette, IN 47906
USA



greenhc
<greenhc@FARMINGD
ALE.EDU>

12/04/2002 05:52 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011'

011894

The proposed amendments, which authorize agencies to procure their printing outside of GPO, are a clear violation of 44U.S.C. '501'.

It is a tradition of our American democratic form of government for our library patrons to have timely, comprehensive and permanent access to Federal government information in print and electronic formats. Please do not support legislation that would harm the FDLP and diminish the public's right to access Government information,.

Carol Greenholz,
Librarian
Farmingdale State University of New York



"Mark Shvets"
<shvetism@wharton.upenn.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 09:54 AM

011-875

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Mark Shvets
234 1/2 Hampton Dr
Venice, CA 90291
USA



"Charles Barber"
<barbercc@muc.edu>
12/04/2002 10:02 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-876

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Charles Barber
South Union Ave.
Alliance, OH 44601
USA



"John Bekas Jr"
<john@bekas.org>
12/04/2002 10:33 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-877

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Bekas Jr
1242 N Cleaver St
Chicago, IL 60622
USA



"Robert Altenburg"
<rca@xlation.com>

12/04/2002 10:36 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-878

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Robert Altenburg
10 Scarsdale Dr
Camp Hill, PA 17011
USA



"Sheryl Soborowski"
<sks358@hotmail.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 10:41 AM

011-879

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Sheryl Soborowski
206 East Grand Blvd
Cheektowaga, NY 14225
USA



"Matthew Starzewski"
<starzews@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 11:06 AM

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Matthew Starzewski
1932 University Ave Apt 804
Madison, WI 53726
USA

011-880



"rob halford"
<udo92@hotmail.com>
12/04/2002 11:37 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-881

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

rob halford
215 s. main st
Hartford, CT 06107
USA



"Debra Wooldridge"
<deb29palms@123mail.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 11:38 AM

011-882

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Debra Wooldridge
1883 Plantation Cir. SE
Palm Bay, FL 32909
USA



"Leslie Foster"
<fosterla@uwec.edu>
12/04/2002 11:43 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-883

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Leslie Foster
1515 Deerfield Rd.
Eau Claire, WI 54701
USA



"Glen Zorn"
<gwz@groovy.com>
12/04/2002 11:49 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-884

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Glen Zorn
12121 Admiralty Way
E-103
Everett, WA 98204
USA



"David Miller"
<dpmiller@world.std.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 12:35 PM

011-885

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Miller
93 Mozart Street
Jamaica Plain, MA 02130
USA



"Ellen Knight"
<ek315@dakotanet.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 12:45 PM

011-886

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Ellen Knight
2709 N. Mountain View Ave
Tucson, AZ 85712
USA



"Eric Klucas"
<eklucas@srcrm.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/04/2002 01:01 PM

011-887

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Eric Klucas
6099 East Speedway Blvd.
Tucson, AZ 85712
USA



"Charles Hall"
<killerqat@astound.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 01:06 PM

011-888

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Charles Hall
565 Park Meadows Dr.
Apt 302
Waite Park, MN 56387
USA



"atifa rawan"
<rawana@u.library.ariz
ona.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 01:10 PM

011-889

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

atifa rawan
1510 E. University Bld
University of Arizona
Tucson, AZ 85721
USA



"David Besch"
<dabesch@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 09:17 AM

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Besch
13657 W 129th Ter
Olathe, KS 66062
USA

011-890



"Mark Rowe"
<MarkKRowe@hotmail.com>

12/04/2002 12:06 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-891

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Mark Rowe
2529 Horsham Rd. Apt. G-8
Hatboro, PA 19040
USA



"Thomas Haviland"
<thavilan@suss.com>
12/04/2002 08:27 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011 892

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Thomas Haviland
100 Duxbury Road
Waterbury, VT 05676
USA



"Marcia Baker"
<bakerme@law.wfu.ed
u>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 01:21 PM

011-893

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Marcia Baker
605 Fox Briari Drive
Greensboro, NC 27455
USA



"Jean Hessenauer"
<JHESSENAUER@Tydi
ngsLaw.com>

12/04/2002 01:48 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: GPO

011894

GPO should continue to print all government documents to allow access to all public information.

Jean Hessenauer
410-752-9804

This message contains information that may be privileged, confidential or otherwise protected from disclosure. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose to anyone the message or any information contained in this message. If you have received the message in error, please notify the sender by replying to this message and then delete it from your system. Thank you very much..



"Luis Arauz"
<luisarauz@msn.com>
12/04/2002 02:01 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-895

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Luis Arauz
3308 N. Springfield Ave
Chicago, IL 60618
USA



"Jan Goldsmith"
<jgoldsmi@library.ucla.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 02:34 PM

011-896

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jan Goldsmith
5243 Buffalo Ave.
Van Nuys, CA 91401
USA



"Drynda Johnston"
<langley@pitt.edu>
12/04/2002 03:07 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-897

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Drynda Johnston
5518 Bartlett St.
Pittsburgh, PA 15217
USA



"Adam Tilghman"
<agt@mib.org>

12/04/2002 03:08 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-898

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Adam Tilghman
10141 Tilton Street
San Diego, CA 92126
USA



"Sarah Mercure"
<aspiringlibrarian@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/04/2002 03:14 PM

011-899

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Sarah Mercure
912 St. Paul Street
Apt. 1-R
Baltimore, MD 21202
USA

2002-011-900



"Bob Claitor"
<claitors@claitors.com
>

12/05/2002 12:39 AM

To: farcase.2002-011@gsa.gov
cc: "Bernadine Abbott Hoduski" <ber@initco.net>, aptak@gpo.gov,
jcameron@gpo.gov, "Francis Buckley" <fbuckley@gpo.gov>,
pmcdermott@alawash.org
Subject: OMB attempt to remove Agencies' printing from GPO

Dear GSA:

I write to ask your support to do everything you can to stop the misguided efforts of OMB to dismantle the Government Printing Office.

GPO is doing an outstanding job, and the efforts of OMB, if successful, will revert us to the problems which GPO solved many years ago, apparently before the OMB hierarchy came to know the genesis of the current GPO.

That is, some years ago, we ALREADY HAD what GPO is asking for NOW, which was individual purchasing of printing by the Agencies, which was riddled with boondoggles for brother-in-law, cousin, etc., all of which was solved by passage of the laws of Title 44 of the US Code, which centralized Agency printing purchasing at GPO and which solved these problems.

The centralized purchasing of printing by GPO has evolved into what is reported to be probably the most efficient purchasing of printing in the U. S., and GPO has the accolades in hand to prove this.

Why go back to brother-in-law politics, and throw all this expertise away?

Not only does GPO save the taxpayer money, but they enable the Federal Depository Library System to provide Federal information to the public, which would surely soon be in shambles if under the "guidance" of inexperienced OMB with their knowledge of only the most recent GPO history and apparently no knowledge whatsoever of the reasons for Title 44 as it now exists. The problem of "fugitive documents" already exists, but the problem would no doubt escalate to rampant under OMB's plan. Books published by GPO are distributed to the Federal Depository Library System in each state, but materials published by Agencies frequently never make it into the FDLS, and come to be known as "fugitive documents."

Sen. John Warner knows perhaps 10 times more than OMB about GPO and the problems that OMB imagines. Why not use his expertise rather than misguided out of date efforts by OMB?

Congressmen/woman, please assist with this problem --- not let OMB flush our treasure of GPO down the drain!

Thanks for your consideration.

Best wishes,

Bob Claitor, President
Claitor's Publishing Division, GPO Agent
Established 1922

cc: Sen. John Warner



"Joseph Titus"
<joe@cport.com>

12/04/2002 03:27 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-901

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joseph Titus
PO Box 2005
1303 20th. Ave #1
Longview, WA 98632
USA



"Anthony Giannini"
<AntoineWG@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 03:28 PM

011-902

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Anthony Giannini
1705 Briarwood Dr.
Johnsburg, IL 60050
USA



"Chris
Christopherson"
<cchristopherson@ne
w.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 03:29 PM

011-903

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Chris Christopherson
823 Kellogg St.
Green Bay, WI 54303
USA



"Lawrence Chang"
<aramchek@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 03:32 PM

011-904

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing about FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). I strongly urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Sincerely,

Lawrence Chang
2114 Golden Gate
San Francisco, CA 94118
USA



"Ronald Colman"
<lib_colman@online.e
mich.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 03:49 PM

011-905

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ronald Colman
352 Glen Lane
Saline, MI 48176
USA



"Derek Baker"
<derek@perfectfit.net>
12/04/2002 03:52 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-906

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Derek Baker
1413 Allston Way
Berkeley, CA 94702
USA



"Laura Conover"
<lconover@mailcity.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 03:58 PM

011:907

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Laura Conover
5 Cranberry Lane
Chelmsford, MA 01824
USA



"Davida Paul"
<Panda1999@mailcity.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 04:02 PM

011-908

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Davida Paul
259 Broad St
Staten Island, NY 10304
USA



"Eric Wayte"
<ewayte@pegasus.cc.
ucf.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 04:09 PM

011-909

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Eric Wayte
2871 Donaldson Drive
Orlando, FL 32812
USA



freamodi@shu.edu
12/04/2002 05:01 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: GPO

011-910

To whom it may concern,

Transferring government publications from being printed by the GPO to being printed by individual departments is not cost effective or time-saving. In fact, having a central organization from which to ship documents cuts the cost in just the shipping area alone. When varying printers are used, the document is less likely to be received in a timely manner, as varying printers require varying amounts of time. It is not cost effective to dismantle the GPO to outside sources, either for the Government or for the Librarians.

Dierdre M. Freamon
Government Documents Assistant
Seton Hall University Law Library
(973) 642-8754
freamodi@shu.edu



"Galen Davis"
<renfield@planet-save.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 05:06 PM

011-911

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Galen Davis
257 Collins Street
San Francisco, CA 94118
USA



"James Roach"
<roajb@rhodes.edu>
12/04/2002 05:11 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-912

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

James Roach
2000 North Parkway
Box 2391
Memphis, TN 38112
USA



"Cassandra Willis"
<cassiemodo@gci.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 05:38 PM

011-913

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Cassandra Willis
7401 Tangle Court
Anchorage, AK 99504
USA



"Marcia Siebesma"
<m-siebesma@onu.ed
u>

To: farcase.2002-011@gsa.gov
cc: baish@law.georgetown.edu
Subject: FAR case 2002-011

12/04/2002 06:26 PM

011-914

To Whom It May Concern:

I am writing to you regarding the proposed changes to the Federal Acquisition Regulations that would allow government agencies to procure their own printing of agency publications without using the Government Printing Office. I am a librarian in an academic law library, where I have worked for over 27 years. Part of my responsibilities has been the oversight of our participation in the Federal Depository Library Program, of which we have been a part since 1965.

I am greatly concerned with the diminishing access to government information, and the effect that these new regulations will have on future access to information. Despite the expressed desire of the FAR Council to "improve dramatically the depository library system by ensuring that all Government publications are in fact made available to the nation's depository libraries", I am concerned about the omission from the amendments of an oversight office or an independent enforcement mechanism. The requirement that agencies report compliance to OMB, does not reassure; OMB has always appeared more concerned with "bottom line" and accounting concerns than with protecting the public's right to know. Having OMB "determine ... current policies or practices" regarding the best format (paper vs. electronic) of government publications seems to be an enormous conflict of interest. Even now, when agencies are required by law to supply adequate copies of documents to GPO's FDLP, a large number of documents remain fugitive from the Program. Without coordination with an agency like GPO, many more documents will never be available for citizen review at present, or historical review by scholars in the future. This concerns not only printed documents, but also electronic publications. While acknowledging the tremendous value that the Superintendent of Documents provides in the indexing, cataloging, and distributing of government documents, the amendments do not adequately ensure that all publications will in fact be transmitted to the SuDocs, nor do they ensure that the most useful format for the public will be used.

In bypassing GPO, each agency will have to re-create a system already in place at GPO to coordinate printing and to oversee each printing contract. Will this really save taxpayers' money? Under the new amendments, agencies would have to supply only one copy of printed documents to the Superintendent of Documents for inclusion in the FDLP and then the SuDocs would have to reprint the items. How efficient is that? Despite language in the amendments suggesting that agencies "whenever feasible" consult with GPO regarding the number of copies GPO might like to order, there is no language compelling them to do so. What about the Sales Program at GPO? If the SuDocs is currently able to ride agency procurement orders to get additional copies for the FDLP and the Sales Program, won't the cost of reprinting copies greatly exceed the cost under the current program, and end up costing libraries and others who purchase these documents much more?

Lastly, the proposal to authorize agencies to procure printing outside of GPO is contrary to current law (44 U.S.C. §501). So is making the SuDocs responsible for bearing the cost of printing and disseminating documents printed outside GPO (44 U.S.C. §1903).

In conclusion, the proposed regulations undermine permanent public access to government information and seem to create more inefficiency in the

011-914

printing and dissemination of government documents. What we really need is more support for the current FDLP and more effective enforcement of current printing regulations, and not an abandonment of the current program.

Sincerely,

Marcia Siebesma

Associate Law Librarian
Ohio Northern University
Taggart Law Library
Ada, OH 45810
voice: 419-772-2254; fax: 419-772-1875
m-siebesma@onu.edu



"Bryan Lynch"
<bmlynch@pacbell.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/04/2002 07:09 PM

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Bryan Lynch
303 Regency Cir Apt 305
Salinas, CA 93906
USA

011-915



"Morgan Evans"
<mae182@psu.edu>
12/04/2002 07:21 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-916

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Morgan Evans
Nittany Apt 5604B
600 E. Pollock Road
State College, PA 16801
USA



"Doyle Myers"
<doyle@blarg.net>
12/04/2002 08:24 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-917

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Doyle Myers
3003 184th Pl SE
Bothell, WA 98012
USA



"Larry Korbein"
<rdx_21@yahoo.com>
12/04/2002 08:47 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-918

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Sincerely,

Larry Korbein
8931 La Crosse Ave
Skokie, IL 60077
USA



"Greg Ballinger"
<gregb@netrox.net>
12/04/2002 09:45 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-919

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Greg Ballinger
26424 Sw 173 Place
Homestead, FL 33031
USA



"Ralph Jones II"
<irico@netdoor.com>
12/04/2002 11:07 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-920

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ralph Jones II
762 Thomasville Rd
Florence, MS 39073
USA



"Dorothy Hampton"
<dhampton@tjssl.edu>
12/04/2002 03:21 PM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
CC:
Subject: FAR Case 2002-011

2002-011-921

This is a comment objecting to the proposed amendment to the Federal Acquisition Regulation (FAR Case 2002-011), published in the Federal Register, Vol. 67, No. 210, November 13, 2002, 68914-8.

As Director of Public Services & Reference at Thomas Jefferson School of Law in San Diego, California, I strongly believe that law students, law faculty, attorneys, and all U.S. citizens need to have ready access to Federal information. The FAR amendments would alter the present, predictable source of information--the Government Printing Office--and substitute perhaps a number of publishers, and undoubtedly increase in the cost of acquiring information, as well.

The proposed amendments, which authorize agencies to procure their printing of public materials outside of the GPO, violate 44 U.S.C. section 501.

Moreover, the FAR proposal violates section 1710, which requires federal agencies to supply a copy of all publications to the Superintendent of Documents.

Most important is that patrons of law libraries--judges, attorneys, law students, and the lay public--need to be able to obtain official, primary Federal legal materials in print as well as in electronic form. We now have one source, the Government Printing Office, from which we can dependably obtain these legal materials. Allowing agencies to select private businesses to publish their information would mean that libraries would have to obtain information from a variety of sources, rather than one, official governmental source. Thus a predictable, integrated system for obtaining current, primary federal legal materials would be turned into a system where librarians would need to deal with several private publishers to keep those materials current. Moreover, the cost of the materials would undoubtedly be higher.

For the reasons above, I urge the Office of Management and Budget to abandon the FAR Case 2002-011 amendments.

Dorothy Hampton
Director of Public Services & Reference
Thomas Jefferson School of Law
2121 San Diego Avenue
San Diego, CA 92110
619/297-9700 x1102
dhampton@tjssl.edu



"Elihu Gerson"
<gerson@ieee.org>
12/04/2002 11:38 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

2002-011-922

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Elihu Gerson
458 29 St
San Francisco, CA 94131
USA



"Michael Beck"
<mgbeck@attbi.com>
12/05/2002 02:23 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-923

December 4, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Michael Beck
PO Box 370294
1292 Birch Street
Montara, CA 94037
USA



"Michael Stickel"
<stick99@attbi.com>
12/05/2002 06:16 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-924

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Stickel
90 Quincy Shore Dr Apt 707
Quincy, MA 02171
USA



"Betty Boyd"
<betty.boyd@lakeland
gov.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 08:27 AM

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-925

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Betty Boyd
Lakeland Public Library
100 Lake Morton Drive
Lakeland, FL 33801
USA



"Anne Birkam"
<a.birkam@saginawlib
rary.org>

12/05/2002 09:07 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR case 2002-011

011-926

Greetings,

I am the Federal Depository Librarian at the Hoyt Public Library in Saginaw, Michigan. Hoyt Public Library has been a Federal Depository Library since 1890. I am writing to comment on FAR Case 2002-011. I am concerned about the effect this rule will have on the access to federal information to the people I serve in Saginaw. I am also concerned that it may end up costing more money than we realize.

"A popular government without popular information, or the means of acquiring it, is but a Prologue to a Farce or a Tragedy; or, perhaps both. Knowledge will forever govern ignorance; and a people who mean to be their own Governors, must arm themselves with the power which knowledge gives." James Madison

Librarians like to quote James Madison to illustrate the importance of public access to government information. The Federal Depository Library Program has been in existence for over 100 years. The Government Printing Office has been in charge of this program the entire time. In 1998 the company Booz-Allen & Hamilton Inc. conducted a study concerning the efficacy of the Government Printing Office. This study can be accessed on the Internet at www.gao.gov; click on Other Publications. Some of the statements in this study include:

"The congressional focus group agreed unanimously the Congress needs a printing capability over which they have control. Similarly when we met with representatives from the executive branch agencies, we found universal support for GPO's printing procurement services. Finally, disseminating government information to the public is an inherent government responsibility and we found no evidence that people believe otherwise."

"Compared to a decade ago, GPO account representatives now service twice as many accounts; moreover, agency personnel administering printing requirements appear to have less experience and training in printing operations and thus require more support from GPO."

"The FDLP ensures that access to government information is available to the public at large. People without the technological means to access information can do so via public access workstations located in the more than 1,400 depository libraries located across the country. Likewise, people who cannot purchase their own copies of print materials of government information can have access to these materials at the depository libraries. Moreover, these collections serve as a historical resource for products that are no longer available through the sales program or publishing agency. In all the aforementioned cases, depository librarians play a critical role in helping people find the government information they need."

"The majority of the Government's printing and publishing requirements are satisfied by commercial vendors. GPO has an established infrastructure dedicated to awarding and administering printing and publishing contracts."

"The staff in GPO's Printing Procurement Department (PPD) are very

011-926

experienced printing specialists, many having been with GPO for 15, 20, and 25 years."

I am quoting this above study because I think it shows the importance of centralized procurement of printing for federal government information. Centralized procurement ensures access to, cataloging of and preservation to government information.

Some years ago a patron requested the title "By the Sweat and Toil of Children." I could not find this title through the Government Printing Office's Monthly Catalog. I sent an interlibrary loan request to our Library Cooperative and received a copy of it from a library in California. This title was published by the Bureau of International Labor Affairs. I called this government agency and was alerted to the fact that they were not aware that Title 44 of the United States Code stipulates that government agencies are required to make their publications available to the public through the Federal Depository Library Program. This publication was then entered into the depository program through the efforts of the Government Printing Office. It is estimated that a large amount of information that agencies publish never reach the Government Printing Office for access, cataloging, dissemination and preservation. If there is no centralized authority for this process even more information will be unavailable. We do not have a centralized authority for printing for the State of Michigan. This means that many Michigan publications never end up in libraries, nor are they catalogued and preserved.

I am also concerned that this rule misrepresents how much it would cost if agencies contracted for printing on their own. I think GPO has the necessary expertise to ensure that the cost of contracting is kept to a minimum. Do the employees at all of these other agencies have the necessary expertise? GPO can also negotiate for more than one agency on different contracts. Would this not save money?

Bruce James is the newly appointed Public Printer. I strongly urge that everyone involved in this decision get together with Mr. James and discuss options, compromises and best practices before making decisions that will have a detrimental effect on the public's access to government information; access that is absolutely essential in a democracy. I also think everyone involved in this decision should read the Booz-Allen & Hamilton report and take it seriously.

Sincerely,

Anne Birkam
Government Documents Librarian
Hoyt Public Library



"John Curtis"
<John.Curtis@usm.edu
u>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 09:19 AM

011-927

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

John Curtis
P. O. Box 5058
Hattiesburg, MS 39406
USA



"Jeff Appelhans"
<jeff@appelhansfamily.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 09:33 AM

011-928

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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As a high school history teacher, I feel very strongly that the GPO's dissemination of printed material is one of the most important jobs to ensure an educated citizenry.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

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Sincerely,

Jeff Appelhans
7326 Flathead Lake Dr
Colorado Springs, CO 80922
USA



"Garofalo Denise"
<dgafal@astorservic
es.org>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

12/05/2002 09:50 AM

011-929

I am very disturbed by the OMB's proposed amendments to the FAR. In order to preserve an informed citizenry (the foundation of a viable democracy) it is imperative that timely, comprehensive and permanent access to Federal government information in print and electronic formats is maintained. In particular, access to these materials by citizens through their libraries is under attack.

These proposed amendments, which authorize agencies to procure their printing outside of GPO, not only undermine the maintenance of access to citizens via depository libraries but are a clear violation of 44 U.S.C. §501.

In addition to violating 44 U.S.C. §501 (which OMB and a Department of Justice memo have claimed is unconstitutional), the proposed changes to the FAR violate other Title 44 provisions that neither OMB nor the Department of Justice have ever challenged as unconstitutional:

" §1903 that requires agencies who procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The FAR proposal that the Superintendent of Documents (SuDocs) would bear these costs is contrary to current law.

" §1710 that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes.

The specifics of how this might be achieved on a comprehensive and cost-effective basis under the proposed FAR change are very unclear.

A strong system of coordination, including an effective and transparent system to bring Government publications into the Federal Depository Library Program, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The FAR amendment does not create such a system, choosing instead to leave a void in the place of the current effective structure.

The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the Superintendent of Documents. This change will negatively impact the Federal Depository Library Program and the public's ability to locate, use, and have permanent access to agency publications in all formats.

I urge you to oversee that 44 U.S.C. §501 is enforced, and that the proposed FAR amendments are not made a reality.

Thank you for your attention.

Denise A. Garofalo

Denise A. Garofalo
Library Director
The Astor Home for Children
6339 Mill Street
PO Box 5005
Rhinebeck, NY 12572-5005
dgafal@astorservices.org
845 871 1013
fax 845 876-2020



"Beth Clausen"
<b-clausen@northwest
ern.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 10:38 AM

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Beth Clausen
1303 Elmwood Ave # 303
Evanston, IL 60201
USA

011-930



"Kim Tomblin"
<otomblin@bellsouth.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 10:46 AM

011-931

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kim Tomblin
2465 Churchill Downs
Cumming, GA 30041
USA



"Catherine Morse"
<c-morse@northwestern.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 10:48 AM

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-932

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Catherine Morse
5063 N. Winchester #1
Chicago, IL 60640
USA



"Dave Shannon"
<cwodave1@netscape.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 10:55 AM

933

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Dave Shannon
1595 Canal Rd Extd
Manchester, PA 17345
USA



"William Bradshaw"
<bradshaw@io.com>
12/05/2002 10:55 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

934

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

William Bradshaw
1041 Latham Rd.
Decatur, GA 30033
USA



"Carol Pijacki"
<cpijacki@buffalo.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 10:57 AM

011-935

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Carol Pijacki
43 Winston Rd
Buffalo, NY 14216
USA



"Meadows, Judy"
<jmeadows@state.mt.us>

12/05/2002 11:02 AM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
CC:
Subject: FAR Case 2002-011

011-936

On behalf of Montana's citizens and state government employees I urge you to abandon your proposal to allow federal agencies to circumvent the Government Printing Office for printing. This proposal would threaten the Federal Depository Library Program, which our constituents depend upon. The FAR proposal puts an unfunded liability squarely on the shoulders of the Superintendent of Documents. The FAR would increase the number of fugitive documents, making it harder for Montanans to acquire them when needed.

A strong system of coordination, including an effective and transparent system to bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world. We need to ensure that agency publications in all formats are permanently accessible by the public. The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current structure that the people of Montana depend upon.

At this time of budgetary crisis for state governments all over the United States, we need full support for public access and the FDLP.

Judy Meadows
State Law Librarian of Montana
PO Box 203004 Helena, MT 59620
jmeadows@state.mt.us
406/444-3660 fax /444-3603
www.lawlibrary.state.mt.us



"Chuck Malone"
<C-Malone@wiu.edu>
12/05/2002 11:03 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: Government Printing Proposal

011-937

I feel that allowing agencies to contract their own printing will get us right back to the boondoggle that existed before the Government Printing Office was formed. The GPO was formed to correct a situation where agencies showed favoritisms, accepted bribes, and so on concerning their printing contracts. Furthermore, the GPO contracts out a great deal of work to minority and smaller printers. These businesses would suffer under this proposal.

And most important, I feel that this proposal would undermine the dissemination of government information to the people through the Federal Depository Library Program -- and violate sections of Title 44 of the U.S. Code.

Charles E. Malone, Unit Coordinator
Government and Legal Information Unit
University Libraries
Western Illinois University
1 University Circle
Macomb, IL 61455
(309) 298-2719
c-malone@wiu.edu



"Leland Lowe"
<lelandlo@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 11:09 AM

011-938

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Leland Lowe
1050 Lorlyn Cir Apt 2D
Batavia, IL 60510
USA



"Jordan, Stephen"
<stephen.jordan@law.
vanderbilt.edu>

12/05/2002 12:19 PM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
CC:
Subject: FAR Case 2002-011

011-939

"Knowledge will forever govern ignorance: and a people who mean to be their own governours must arm themselves with the power which knowledge gives."
James Madison in a letter to W.T. Barry, 4 August 1822

I write regarding proposed amendments by the OMB to the Federal Acquisition Regulation that would allow agencies to procure their own printing outside of GPO.

In order to ensure the efficacy of Mr. Madison's clarion statement, I assert that the Government should continue to provide for equitable, effective, no-fee, efficient, and dependable access to and dissemination of Government information in permanent and readily accessible formats. In conjunction, a centralized, coordinated, and managed federal information dissemination and access program such as the Federal Depository Library Program is essential to achieve the fundamental principle so eloquently stated by Mr. Madison.

History demonstrates that Congress has opposed and thwarted similar efforts by OMB in 1987 and 1994. Indeed, the 107th Congress strongly opposed OMB's proposed amendments by including provisions in their continuing resolutions funding government operations -- most recently in H.J. Res. 124 -- that would prevent agencies from using any appropriated funds to procure publications outside of GPO.

There are two particular reasons why I oppose the proposed amendments:

1. They do not ensure that agencies meet their legal obligations to provide tangible AND electronic publications to the SuDocs. Access to government information in ALL formats is essential so as to provide wide access.
2. I work in a law library. Law Libraries are particularly dependent on the GPO's Sales Program to purchase print Government primary legal materials that may be provided to depository libraries only in an unofficial electronic version. The proposed amendments do not adequately provide for a continued cost effective Sales Program.

Stephen R. Jordan
Law Librarian
Alyne Queener Massey Law Library
Vanderbilt University Law School
131 21st Avenue South
Nashville, TN 37203

These views are my professional opinions and do not necessarily reflect the views of Vanderbilt University Law School.



"Cahn, Mary"
<MCahn@Cahill.com>

12/05/2002 12:34 PM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: FAR Case 2002-011

011-940

As a law librarian and private citizen, I am opposed to the proposed changes to the FAR that would negatively impact public access to government information and the FDLF. We need a centralized printing office. The proposed amendments clearly violate 44 U.S.C. Sec. 501. Libraries and the public depend on GPO for low cost, centralized service. Please do not implement these changes.

Mary Cahn
Reference Librarian
Cahill Gordon & Reindel

The information contained in this e-mail message may be privileged and confidential information and is intended only for the use of the individual and/or entity identified in the alias address of this message. If the reader of this message is not the intended recipient, or an employee or agent responsible to deliver it to the intended recipient, you are hereby requested not to distribute or copy this communication. If you have received this communication in error, please notify us immediately by telephone or return e-mail and delete the original message from your system.

Thank you.



"Gregory Peters"
<suti@speakeasy.net>
12/05/2002 12:36 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-941

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Gregory Peters
1017 Lark Lane
Foster City, CA 94404
USA



"Shawn Powell"
<shawncp@kcnet.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/05/2002 12:49 PM

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Shawn Powell
PO Box 132
106 W. 4th Street, Apt. A.
Peculiar, MO 64078
USA

011-942



"Sarah Peters"
<glossomania@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 01:00 PM

011-943

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Sarah Peters
435 Alcatraz
Oakland, CA 94609
USA



"Christopher Hall"
<dinosaur@noct.net>
12/05/2002 01:03 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-944

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Christopher Hall
222 W14th St. Apt 4K
New York, NY 10011
USA



"MARQUARDT,
STEVE"
<STEVE_MARQUARDT
@SDSTATE.EDU>

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc: "pmcdermott@alawash.org" <pmcdermott@alawash.org>, "Governor
of South Dakota" <SDGOV@state.sd.us>
Subject: FAR Case 2002-011

12/05/2002 01:12 PM

011-945

Decem
ber 5,
2002

TO: Federal Acquisition Regulations Council
FROM: Steve Marquardt, Dean of Libraries
South Dakota State University
SUBJECT: Federal Acquisition Regulations FAR Case 2002-011 vs. GPO (Government
Printing Office)

I wish to go on record as opposed to the changes proposed in OMB Memorandum No. M-02-07, regarding amendments to the Federal Acquisition Regulations, now contained in FAR Case 2002-011. Director Mitchell E. Daniels Jr. of the Office of Management and Budget (OMB) issued Memorandum No. M-02-07 entitled "Procurement of Printing and Duplicating through the Government Printing Office" (GPO) on May 3, 2002. The memorandum calls for amendments to the Federal Acquisition Regulations (FAR) that will allow agencies to procure their printing outside of GPO. The proposed amendments were published in the *Federal Register*, Vol. 67, No. 219, November 13, 2002, 68914-8.

The students and researchers who use the South Dakota State University Library need timely, comprehensive and permanent access to Federal government information in print and electronic formats.

An informed citizenry is necessary for a free society. **Accessible government information is an essential principle of a democratic society** and a valuable public good created at taxpayer expense. **Government should provide for equitable, effective, no-fee, efficient and dependable access to and dissemination of government information** in permanent and readily accessible formats. To provide this important taxpayer-funded service requires a strong, centralized, coordinated and managed federal information dissemination and access program, such as the Federal Depository Library Program (FDLP).

OMB's efforts to have agencies procure printing outside of GPO are not new. Privatization efforts were thwarted by Congress in 1987 and 1994, demonstrating full Congressional support for public access and the FDLP. **Recently, Members of the 107th Congress, on a bicameral and bipartisan basis, included provisions to prevent agencies from using any appropriated funds to procure publications outside of GPO** in their continuing resolutions that fund government operations (most recently, in H.J.Res. 124). These provisions indicate strong Congressional opposition to OMB's proposed amendments to the FAR.

Here are some of the key points against the proposed FAR Case 2002-011:

011-945

1) The **proposed amendments**, which authorize agencies to procure their printing outside of GPO, are a **clear violation of 44 U.S.C. §501**.

2) In addition to violating 44 U.S.C. §501 (which OMB and a Department of Justice memo have claimed is unconstitutional), the **changes proposed** in FAR Case 2002-011 **violate other Title 44 provisions** that neither OMB nor the Department of Justice have ever challenged as unconstitutional:

- **§1903 that requires agencies who procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries.**

The **FAR proposal** that the Superintendent of Documents (SuDocs) would bear these costs is **contrary to current law**.

- **§1710 that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes.**

The **specifics** of how this might be achieved on a comprehensive and cost-effective basis under the proposed FAR change are very **unclear**.

3) While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR change are left so vague that the result will be **more fugitive (ultimately missing) publications**, not fewer. Today, the SuDocs, working with its professional library personnel, provides a strong, centralized, coordinated and managed Federal information dissemination and access program through the FDLP.

4) A strong system of coordination, including an effective and transparent system to bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. **The FAR amendment** does not create such a system, and instead leaves a **void in the place of the current effective structure**.

5) The proposed FAR does **not** take into account the need for **an effective enforcement mechanism, with Congressional oversight**, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

6) **Today, the SuDocs is able to** ride agency procurement orders to **obtain publications** for the FDLP and the Sales Program **at low cost**. Libraries and members of the public depend on GPO's Sales Program to acquire print Government publications. The proposed FAR does not adequately provide for a continued cost effective Sales Program.

Again, our patrons need timely, **comprehensive and permanent access** to Federal government information in print and electronic formats.

011-945

I hope that you will work to prevent implementation of the ineffective and costly proposals within FAR Case 2002-011.

Sincerely,
ly,

Steve
Marquardt,
Ph.D.
Dean
of
Libraries

Copies to: Hon. Tom Daschle, Senator from South Dakota
Hon. Tim Johnson, Senator from South Dakota
Congressman-Elect William J. Janklow

*Steve Marquardt
Dean of Libraries
Box 2115
South Dakota State University
North Campus Drive
Brookings, SD 57007-1098
605-688-5106
FAX: 605-688-6133
steve_marquardt@sdstate.edu*



"Sofia Tangalos"
<tangalos@buffalo.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 01:27 PM

011-946

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Sofia Tangalos
239 Huntington Avenue
Buffalo, NY 14214
USA



"Louis Davis"
<louis_davis@vtel.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 01:31 PM

011-947

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Louis Davis
12340 Shropshire Blvd.
Austin, TX 78753
USA



"Christopher Hoover"
<ch@murgatroid.com>
12/05/2002 01:53 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-948

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Sincerely,

Christopher Hoover
741 Pollard Road #4
Los Gatos, CA 95032
USA

011-949



"Jane Whiteside"
<jmwhiteside@fountaindale.lib.il.us>

To: farcase.2002-011@gsa.gov
cc:
Subject: Fwd: [HTLS Broadcast] FW: [ALA-WO:778] ACT!/ Urgent Action Needed on Threats to Public Access and theFDLP

12/05/2002 02:00 PM

I agree with the comments from ALA. Please pay attention to efficient access of information by the American Public.

Jane M. Whiteside
District Coordinator, Collection Management
Fountaindale Public Library District
300 West Briarcliff Rd.
Bolingbrook, IL 60440
630-759-2102 Option 1, Ext. 12
FAX:630-759-9519
<http://fountaindale.lib.il.us>
e-mail: jmwhiteside@fountaindale.lib.il.us

-----Original Message-----

From: owner-ala-wo@alal.ala.org
[mailto:owner-ala-wo@alal.ala.org] On
Behalf Of ALAWASH E-MAIL
Sent: Wednesday, December 04, 2002 2:26 PM
To: ALA Washington Office Newsline
Subject: [ALA-WO:778] ACT!/ Urgent Action Needed on Threats to Public Access and theFDLP

ALAWON: American Library Association Washington Office Newsline
Volume 11, Number 98
December 4, 2002

In This Issue: URGENT! Comments Needed by December 13th on OMB's Proposed Amendments to the FAR That Threaten Public Access and the Federal Depository Library Program.

BACKGROUND:

Director Mitchell E. Daniels Jr. of the Office of Management and Budget (OMB) issued Memorandum No. M-02-07 entitled "Procurement of Printing and Duplicating through the Government Printing Office" (GPO) on May 3, 2002. The memorandum calls for amendments to the Federal Acquisition Regulations (FAR) that will allow agencies to procure their printing outside of GPO. The proposed amendments were published in the Federal Register, Vol. 67, No. 219, November 13, 2002, 68914-8. The deadline for comments is Friday, December 13, 2002.

Accessible government information is an essential principle of a democratic society and a valuable public good created at taxpayer

011-949

expense. ALA believes that government should provide for equitable, effective, no-fee, efficient and dependable access to and dissemination of government information in permanent and readily accessible formats.

ALA further believes that a strong, centralized, coordinated and managed federal information dissemination and access program, such as the Federal Depository Library Program (FDLP), is necessary to achieve this important goal.

CURRENT CRISIS:

OMB's efforts to have agencies procure printing outside of GPO are not new. Congress, demonstrating full support of public access and the FDLP, successfully thwarted efforts in 1987 and 1994. Recently, Members of the 107th Congress, on a bicameral and bipartisan basis, included provisions to prevent agencies from using any appropriated funds to procure publications outside of GPO in their continuing resolutions that fund government operations (most recently, in H.J.Res. 124). These provisions indicate Congress' strong opposition to OMB's proposed amendments to the FAR.

The following talking points will be useful in your comments on the proposed FAR:

1) The proposed amendments, which authorize agencies to procure their printing outside of GPO, are a clear violation of 44 U.S.C. §501.

2) In addition to violating 44 U.S.C. §501 (which OMB and a Department of Justice memo have claimed is unconstitutional), the proposed changes to the FAR violate other Title 44 provisions that neither OMB nor the Department of Justice have ever challenged as unconstitutional:

· §1903 that requires agencies who procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries.

The FAR proposal that the Superintendent of Documents (SuDocs) would bear these costs is contrary to current law.

· §1710 that requires agencies to supply a copy of all publications to the SuDocs

011-949

for cataloging purposes.

The specifics of how this might be achieved on a comprehensive and cost-effective basis under the proposed FAR change are very unclear.

3) While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR change are left so vague that the result will be more fugitive publications, not fewer. Today, the SuDocs, working with its professional library personnel, provides a strong, centralized, coordinated and managed Federal information dissemination and access program through the FDLP.

4) A strong system of coordination, including an effective and transparent system to bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The FAR amendment does not create such a system, choosing instead to leave a void in the place of the current effective structure.

5) The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

6) Today, the SuDocs is able to ride agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and members of the public depend on GPO's Sales Program to acquire print Government publications. The proposed FAR does not adequately provide for a continued cost effective Sales Program.

ACTION NEEDED:

Please submit electronic comments on the proposed FAR to farcase.2002-011@gsa.gov by Friday, December 13th, citing "FAR Case 2002-011" in the subject line and the text. Base your comments on a few of the talking points above, and be sure to talk about the needs of your patrons to have timely, comprehensive and permanent access to Federal

011 949

government information in print and electronic formats.

Please also fax a copy of your comments to your Senators and Representative at their Capitol Hill and local offices with a brief note of explanation. Go to <http://capwiz.com/ala/dbq/officials/> for a link to fax numbers for your Members. (Fax is preferable to e-mail because it provides staff with a tangible version of your comments.)

If you have a newly elected representative, this is a good time to introduce yourself while explaining the negative impact of OMB's action on public access.

We are in a crisis situation! Members of ALA have been very instrumental in helping to ward off previous efforts that would harm the FDLP and diminish the public's right to access Government information.

We would also appreciate it very much if you would send a copy of your comments along to us via e-mail at: <mailto:pmcdermott@alawash.org> .

Thanks to Mary Alice Baish (AALL) for her work on this alert.

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ALA Washington Office, 1301 Pennsylvania Ave., N.W., Suite 403, Washington, D.C. 20004-1701; phone: 202.628.8410 or 800.941.8478 toll-free; fax: 202.628.8419; e-mail: alawash@alawash.org; Web site: <http://www.ala.org/washoff>. Executive Director: Emily Sheketoff. Office of Government Relations: Lynne Bradley, Director; Camille Bowman, Mary Costabile, Don Essex, Patrice McDermott and Miriam Nisbet. Office for Information Technology Policy: Rick Weingarten, Director; Jennifer

Hendrix, Carrie Russell, Claudette Tennant. ALAWON Editor:
Bernadette
Murphy.

011-949

*****You have received this message because you are
subscribed to the Heritage Trail Library System's Broadcast
email list. To post a message, send it to
broadcast@htls.info*****



"John Jack"
<johnjack@ufl.edu>
12/05/2002 02:08 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-950

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

John Jack
1670 n.w. 19th ln
Gainesville, FL 32605
USA



"Matthew Shaw"
<shawmatr@notes.udat
yon.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 02:18 PM

011-951

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Matthew Shaw
1709 Claire Stevens Cr.
Knoxville, TN 37931
USA



"Janet Wamsley"
<jwamsley@teamster.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 02:47 PM

011-952

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Janet Wamsley
3000 Spout Run Parkway
Arlington, VA 22201
USA



"Joseph P. Horgan"
<Josephhorgan@worki
ngfamilies.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 02:59 PM

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Joseph P. Horgan
3102 Edgewood Road
Kensington, MD 20895
USA

011-953



"Brown Ken R GG-12
690ISS/VPR"
<Ken.Brown@LACKLA
ND.AF.MIL>

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: (U//FOUO) Far case 2002-011

12/05/2002 02:57 PM

011-954

Classification: UNCLASSIFIED//FOR OFFICIAL USE ONLY

After reading the proposed changes I feel compelled to submit the following comments for consideration.

I believe the proposed changes should exempt the Intelligence communities and their need for in-house production of classified, intelligence, homeland security or other sensitive publication requirements. Current DoD regulations provide the exemption for the IC communities and I believe this should continue. It should include the CIA, NSA, DIA, NIMA, and the armed services Intel or homeland security operations.

These are my personal views and not the official views of any of these agencies.

Thanks,
Ken Brown
Printing Officer
Air Intelligence Agency

Classification: UNCLASSIFIED//FOR OFFICIAL USE ONLY



spenserz@att.net

12/05/2002 03:10 PM

To: farcase.2002-011@gsa.gov
cc:
Subject:

011-955

I am against any and all efforts that would harm the FDLP and diminish the public's right to access Government information. A government for the people and by the people is predicated on long term access to information.

Sincerely,

S. Thompson
Librarian
California, USA



"Chris Ryan"
<xgbe@yahoo.com>
12/05/2002 03:08 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-956

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Chris Ryan
320 South Hill Lane
Chesapeake, VA 23322
USA



"John Rinderle"
<jar2@andrew.cmu.ed
u>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 03:21 PM

011-957

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

John Rinderle
5606 Beacon St
Pittsburgh, PA 15217
USA



"Keith Jeffery"
<jeff2619@uidaho.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 03:25 PM

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Keith Jeffery
620 Idaho Ave
Moscow, ID 83843
USA

011-958



"Monica Kirby"
<MKirby@las-cruces.org>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

12/05/2002 03:38 PM

011-959

I simply do not understand why I should be expected to pay for information that has been gathered using my tax dollars.

Monica A. Kirby
726 Lariat Dr.
Las Cruces NM 88011

As a librarian, I am concerned about making information available to the public as well as retaining information for future generations. The only guarantee of this is through the Superintendent of Documents and GOP already set up for this very purpose.

Monica Kirby
Reference Librarian
Thomas Branigan Memorial Library
200 E. Picacho Ave.
Las Cruces NM 88001
505-528-4016
Fax: 505-528-4030

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (<http://www.grisoft.com>).
Version: 6.0.404 / Virus Database: 228 - Release Date: 10/15/2002



"Julie Blankenburg"
<jblankenburg@fs.fed.
us>

To: farcase.2002-011@gsa.gov
cc:
Subject: Changes to printing contract

011-960

12/05/2002 03:59 PM

Do these changes apply to the bindery contract GPO has that we are required to use? I ask because it would be cheaper to use a book binder in the midwest than to ship the books out to the GPO contract binder on the east coast. I have been unable to get a waiver to use a local book binder.

Julie Blankenburg, Librarian
Forest Products Laboratory
One Gifford Pinchot Drive
Madison, WI 53726-2398

Customer comment card:

http://www.srs.fs.fed.us/customer/commentcard_fpl.htm

Phone: (608) 231-9491

Fax: (608) 231-9311

Alternate e-mail: jjjblanke@facstaff.wisc.edu



"Ben Embree"
<bene@san.rr.com>
12/05/2002 04:04 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-961

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ben Embree
5514 Chandler Dr
San Diego, CA 92117
USA



"Jonathan Boutelle"
<boutelle@tampabay.rr
.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 04:07 PM

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jonathan Boutelle
12017 Mountbatten Drive
Tampa, FL 33626
USA

011-962



"Susan Nevelow Mart"
<marts@uchastings.ed
u>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 04:24 PM

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Susan Nevelow Mart
200 McAllister Street
San Francisco, CA 94102
USA

011-963



"Carol Spector"
<csspector@usfca.edu
>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

12/05/2002 05:01 PM

011-964

To Whom It May Concern:

OMB's proposed amendments to the FAR threaten public access and the Federal Depository Library Program. As a reference librarian and a government documents specialist, I am opposed to these changes because I feel they will hinder citizens' ability to access government information. Please consider alternative means of meeting the proposed goals. The FDLP is a critical for guaranteeing public access to federal documents and any rules proposed by OMB should strive to enhance, rather than undermine, this program.

Thank you for your consideration of this important issue.

Sincerely,
Carol Spector



"Thomas Mawson"
<tmaw@ucla.edu>

12/05/2002 05:11 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-965

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Thomas Mawson
250 De Neve Dr.
Los Angeles, CA 90024
USA



"Samuel Smith"
<grizzly234@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 05:46 PM

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-966

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Samuel Smith
5445 S Ingleside Ave
Chicago, IL 60615
USA



"Nathaniel West"
<nathaniel@nathaniel
west.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 05:48 PM

011-967

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Nathaniel West
1041 19th St Apt 2
Santa Monica, CA 90403
USA



"Hussein Kanji"
<hussein@stanfordalu
mni.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 06:13 PM

011-968

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Hussein Kanji
632 Camellia Way
Los Altos, CA 94024
USA



"Sandra Ewen"
<sandewen@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 06:35 PM

011-969

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Sandra Ewen
4210 Forthlin Cir
Katy, TX 77494
USA



"Richard Tietjen"
<rdtietjen@pobox.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 07:18 PM

011-970

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Richard Tietjen
110 Boston St. #2
Guilford, CT 06437
USA



"Eugene Dean"
<edean@comcast.net>
12/05/2002 07:22 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-971

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Eugene Dean
1401 N. Taft St.
1025
Arlington, VA 22201
USA



"Leo Ahumada"
<bpa_leo@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 08:43 PM

011-972

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Leo Ahumada
150-66 Bayside Ave.
Flushing, NY 11354
USA



"Andrew Hrubik"
<ahrubik@cox.net>
12/05/2002 09:42 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

011-973

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Andrew Hrubik
1132 NE 9th Ct
Moore, OK 73160
USA



"Walter Susong III"
<wsusong@susongnet.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 10:32 PM

011-974

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Walter Susong III
14880 Freemanville Rd
Alpharetta, GA 30004
USA



"Jonathan Beckel"
<beckel@mn.rr.com>
12/05/2002 11:38 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-995

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jonathan Beckel
5008 Washburn Ave S
Minneapolis, MN 55410
USA



"Darrell Maronde"
<dmaronde@attbi.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/05/2002 11:47 PM

011-976

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Darrell Maronde
3712 Yosemite
Plano, TX 75023
USA



"Kevin Keeney"
<kevin.keeney@mo.ng
b.army.mil>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 12:16 AM

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

011-977

Dear FAR Board ,

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Sincerely,

Kevin Keeney
201 Old Mill Rd
Bonnots Mill, MO 65016
USA



"Lawrence Leventhal"
<lleventh@vt.edu>
12/06/2002 12:55 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Lawrence Leventhal
11968 Dolly Madison Cr
Woodbridge, VA 22192
USA

011-978



"Andrew Rysavy"
<TheRizz@aol.com>
12/06/2002 02:49 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Andrew Rysavy
1429 N 21st St
Apt. #5
Bismarck, ND 58501
USA

011-979



"Nicole Cuadra"
<nicolecuadra@yahoo.com>

To: farcase.2002-011@gsa.gov
CC:
Subject: Far Case 2002-011

011-980

12/06/2002 02:53 AM

When documents produced by public agencies are printed by private contractors, as is currently being reviewed in Far Case 2002-011, the public runs the risk of losing access to information. Private firms operating in the information industry

Do you Yahoo!?
Yahoo! Mail Plus - Powerful. Affordable. Sign up now.
<http://mailplus.yahoo.com>



"Joelson Deguzman"
<mauztek@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 02:51 AM

011-981

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joelson Deguzman
1530 Nelson Ct
Santa Clara, CA 95054
USA



"Stephen Brannen"
<kthak@wormbaby.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 02:52 AM

011-982

December 5, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Stephen Brannen
3625 S Parklane Ave
Springfield, MO 65807
USA



"Paul T. Jackson"
<trescott@ruralfree.net
>

12/06/2002 03:20 AM
Please respond to "Paul
T. Jackson"

To: farcase.2002-011@gsa.gov, "Patti Murray"
<senator_murray@murray.senate.gov>,
"Dunnwa08@Mail.House.Gov" <dunnwa08@mail.house.gov>,
President@whitehouse.gov, Vice.President@whitehouse.gov

cc:
Subject: FAR Case 2002-011

011-983

OMB and President continue to overstep their authority.

1) The proposed amendments, which authorize agencies to procure their printing outside of GPO, are a clear violation of 44 U.S.C. §501.

Why does the Presidential office require this change? Has someone who is a big printing industry guru given money to the Republican Party. This is usually what has caused change by the administration, not the need.

2) In addition to violating 44 U.S.C. §501 (which OMB and a Department of Justice memo have claimed is unconstitutional), the proposed changes to the FAR violate other Title 44 provisions that neither OMB nor the Department of Justice have ever challenged as unconstitutional:

So why does the Presidential Office think they can do things that are against the current law. I have never seen such railroading going on from the Presidents side of the government in my life!

- §1710 that requires agencies to supply a copy of all publications to the SuDocs for cataloging purposes.

The specifics of how this might be achieved on a comprehensive and cost-effective basis under the proposed FAR change are very unclear.

Re-organizing something does not necessarily work, it only looks like somebody is doing something to earn their keep, but rarely solves any given problem.

4) A strong system of coordination, including an effective and transparent system to bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The FAR amendment does not create such a system, choosing instead to leave a void in the place of the current effective structure.

The office of the President as well as congress should make sure any such changes will enhance a system. Apparently this change will not enhance anything in terms of the public getting access to what is going on. But then this is and has been the

011-983

President's mode of operations. Do it and then figure out how to cover it.

Unless the OMB and President can offer a valid reason for this change, I see no need for this total disregard of what the people want, which is why there has been a law already on the books to deal with this. It seems a way for the OMB and the President to change the law without having to ask congress...a way that is becoming common place with this President.

Any thing done by the President's office that is going around the law is an affront to the American people and should be stopped in its tracks.

Paul T. Jackson - Trescott Research
Information & Library Development
trescott@umich.edu
<http://www.bookbay.com/PioneersInBrass.htm>



"Justin Graham"
<fool@atomichamster.
com>

12/06/2002 03:35 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-984

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Justin Graham
1685 E. 1000 Road
Lawrence, KS 66049
USA

011-985



"Todd Lovette"
<flynn42@earthlink.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 03:37 AM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Todd Lovette
10814 Cochiti Rd SE
Albuquerque, NM 87123
USA

011-986



"Robert Fagg"
<vincent_richter@emai
l.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 04:28 AM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Fagg
4619 Westwood Ct
Dublin, CA 94568
USA



"Jason Pullara"
<lordkat@hotmail.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-987

12/06/2002 06:35 AM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Jason Pullara
87 Goller Pl
Staten Island, NY 10314
USA



"Alfred Frisch"
<asfrisch@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 07:55 AM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Alfred Frisch
2190 Vassar Drive
Boulder, CO 80305
USA

011-988



"William Evans"
<thumbtack1348@cox.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 08:06 AM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

William Evans
618 Commander Drive
Roanoke, VA 24012
USA

011-989



"Neil Hodge"
<nhodge1@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 08:50 AM

011-990

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Neil Hodge
5090 Haven Place #200
Dublin, CA 94568
USA



"Laura Sare"
<sare@students.uiuc.edu>

To: farcase.2002-011@gsa.gov
CC:
Subject: FAR Case 2002-011

12/06/2002 08:59 AM

011-991

Will the OMB enforce 44 USC 19 and penalize those agencies that do not pay for and provide copies of their publications to the libraries through the depository program? Will OMB factor into their cost savings argument the cost of every agency asking for and hopefully receiving separate appropriations for the depository program, setting up an accounting and distribution system to make sure those publications get to Superintendent of Documents for distribution and dissemination? Will each agency now hire staff to make sure that their publications are identified and cataloged as required in 44 USC 1710 and 1711 and that information is provided to Supt Doc for inclusion in the Monthly Catalog and GPO Access? Will each agency make sure that the publications sent to depository libraries and cataloged by GPO are sent to the National Archives and the Library of Congress for retention as required by other sections of 44 USC?

I think the answer is no to all these questions. All of these services are now provided by a centralized body, the Superintendent of Documents, and will have to be duplicated throughout the government.

What this means is that the public, which includes educators, scientists, doctors, students, reporters, and everyone else dealing with the government will have a much harder time finding the government information that they need, and may even have to pay for it, where as now it is available free through depository libraries, with trained reference staff who are familiar with how GPO runs to find information quickly.

Laura Sare, MS Student in Library Science

Questions from Bernadine Abbott Hoduski, Chair of the ALA Committee on Legislation



"Eric Windisch"
<nospam@bwbohh.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 09:28 AM

011-992

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Eric Windisch
1268 Hemlock Dr
Langhorne, PA 19053
USA



"Audrey Hall"
<AHALL@SLOMA.state
.oh.us>

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: FAR Case 2002-011

12/06/2002 09:41 AM

011-993

I want to add my concern as a government documents librarian for the potential loss of federal government publications if agencies are permitted to procure their own printing outside of GPO as proposed by OBM Memorandum No. M-02-07 "Procurement of Printing and Duplicating through the Government Printing Office" May 3, 2002.

In the state of Ohio, agencies are required by law (ORC 149.11) to send 100 publications to the State Library of Ohio for distribution to the state depository libraries. There is no enforcement written into the law so the system is voluntary with constant reminders from the State Library. Even so, many documents are not sent to the State Library of Ohio, not even a minimum of two copies. We know this because of the frequent requests from agencies for their own past publications which they did not keep or send to us. I point this out as an example of how poorly a decentralized system works.

The Federal Depository Library Program has a strong centralized, coordinated and managed federal information dissemination and access program in place. It should be strengthened not weakened.

Our democracy is strengthened by an informed public. This is not the time with the numerous problems facing our country to impede the flow of information to the public. Particularly not of information gathered with taxpayers' money.

Yours truly,

Audrey L. Hall
Government Information Services
The State Library of Ohio
274 E. First Avenue
Columbus, OH 43201
614-644-7051
614-752-9178 Fax
ahall@sloma.state.oh.us <mailto:ahall@sloma.state.oh.us>



"Nathan Labadie"
<ab0781@wayne.edu>
12/06/2002 09:43 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-994

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Nathan Labadie
25224 Dallas Dr
Grosse Ile, MI 48138
USA



"Michael Cooper"
<mcooper@fit.edu>
12/06/2002 09:54 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-995

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Michael Cooper
740 Wildbriar Rd NE
#305
Palm Bay, FL 32905
USA



"Jonathan Sellers"
<drrock@amlor.org>
12/06/2002 09:57 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

011-996

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jonathan Sellers
17 Safe Harbor Vlg
Conestoga, PA 17516
USA

011-997



"David Vedder"
<dave@eskimospy.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 09:58 AM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Vedder
33 Lansdale St
Rochester, NY 14620
USA

011-998



"Edward Simmonds"
<edward@simmonds.n
ame>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/06/2002 10:09 AM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Edward Simmonds
4950 N Marine Dr Apt 1204
Chicago, IL 60640
USA

011-999



"Javier Jones"
<javier@projsound.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/06/2002 10:15 AM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Javier Jones
978 Barnacle Drive
Manahawkin, NJ 08050
USA

2002-011-1000



"Ken Lubar"
<ken@lubar.net>

12/06/2002 10:33 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Ken Lubar
33 Gray Street
Arlington, MA 02476
USA

011-1001



"Mark Budzyn"
<budzynm@aol.com>
12/06/2002 10:41 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Mark Budzyn
11 Vanderbilt Place
Woodbridge, NJ 07095
USA

1002



"Dustin C. Owen"
<dustin@halo7.com>
12/06/2002 10:47 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Dustin C. Owen
2101 Crestmeadow
Denton, TX 76207
USA

1003



"Scott Vickers"
<markwscottv@msn.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 10:51 AM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Scott Vickers
1440 Franklin Street
Denver, CO 80218
USA



"Annice Butler"
<abutler@uh.edu>

12/06/2002 11:23 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1004

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Annice Butler
1721 Wakefield
Houston, TX 77018
USA



"Dave Killion"
<davekillion@sbcglob
al.net>

12/06/2002 11:33 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

1005

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Dave Killion
5029 Longhorn Way
Antioch, CA 94531
USA

1006



"Michael Briggs"
<mbriggs@mchsi.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 12:09 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Briggs
2651 Glen Hollow Court
Coralville, IA 52241
USA

1007



"Alex Mauer"
<hawke@hawkesnest.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/06/2002 12:13 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Alex Mauer
1629 Division St.
Stevens Point, WI 54481
USA



"Donald Ziliotto"
<dziliotto@directvinter
net.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 12:28 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Donald Ziliotto
404 Ashley Ave
Brielle, NJ 08730
USA

1008



"Mark Trynor"
<excesspwr@pcisys.net>

12/06/2002 12:31 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1009

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Mark Trynor
3532 Queen Anne Way
Colorado Springs, CO 80917
USA



"Christopher Cowan"
<ceez@bga.com>
12/06/2002 12:36 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1010

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Christopher Cowan
3543 Greystone Dr
#2129
Austin, TX 78731
USA

1011



"John Giotta"
<john@dv8flasher.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011
>

12/06/2002 12:43 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Giotta
5608 Racine Ave
Mobile, AL 36618
USA

1012



"Mark Notarus"
<notarus-~~eff~~@notarus.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 12:46 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Mark Notarus
601 Carlsbad Trail
Roselle, IL 60172
USA

1013



"Douglas Lewis"
<dlewis@sbcglobal.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011
>

12/06/2002 12:46 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Douglas Lewis
1213 Shenandoah Apt. B
Saint Louis, MO 63104
USA

1014



"Miltenoff, Plamen"
<pmiltenoff@stcloudstate.edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: FW: GPO for their printing needs

12/06/2002 12:52 PM

To whom it may concern:

I am following up the reports on NPR and our govpub librarian (Sandra Williams) regarding the difficulties that GOP faces and the intentions to outsource the services.

I am a new citizen of this country. I can't stop to marvel and wonder certain disparities in the American society.

While I was at the Library school, I learned that govpub docs are distributed to libraries throughout the country and, I thought, this is one of the best proofs of democracy in action I have ever seen. When I go back to my native country and speak about my new home country, I still use this as an example of education in democracy.

Now, I listen and see the possibility of taking that basic democratic right from the American citizens: having free access to government documents. Next time I go to my country, I will use the follow up example of HOW FRAGILE and VULNORABLE democracy can be. Coup-de-etats and dictatorships are not the only danger to democracy. A daily nuances like the lack of money to support the distribution of the govpub docs can be also dangerous to democracy.

I hope and believe that the government will find a way to maintain.

Plamen Miltenoff
Information Specialist / Librarian
204-J James W. Miller Center
Learning Resources and Technology Services
720 Fourth Avenue South
St. Cloud, MN 56301-4498
320-255-3072
pmiltenoff@stcloudstate.edu
<http://lrs.stcloudstate.edu/faculty/pmiltenoff/index.html>

1015



"Connie Salyers"
<csalyers@shawnee.edu>

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: FAR Case2002-011

12/06/2002 01:03 PM

**FAR Case 2002-011<?xml:namespace prefix = o ns =
"urn:schemas-microsoft-com:office:office" />**

Thank you for the opportunity to give input.

I disagree with the proposed amendments (FAR) that U. S. government agencies are allowed to procure their printing outside of the Government Printing Office (GPO). These proposed amendments show disregard for 44 U.S.C. §501 which spells out the statutory requirement that printing be done through the GPO. As an academic librarian I strongly feel the proposed changes are going to diminish the public's access to government information. Government information is something the people own--it is paid for by the taxpayers--and the government holds it in trust for the benefit of the people. The Clark Memorial Library of Shawnee State University in Ohio participates in the federal government depository program and makes government documents available to students, faculty and community library users. The library holdings include both print and electronic copies of federal documents and access is very timely. Shawnee State University is located in rural Southern Ohio and serves community users from multiple counties including Northeast Kentucky counties across the Ohio river.

Do the proposed amendments guarantee that each agency be required to send copies to the Government Printing Office as noted in the U. S. Code? Do the proposed amendments allow for penalties if the agencies do not comply? Will government agencies be in compliance with their statutory obligations if these amendments are approved? How do the proposed amendments address making copies available to the libraries participating in the Federal Depository Library program (FDLP). 44 U.S.C. §501 has wording that says government publications shall be made available to depository libraries.

The Federal Depository Library program was begun in 1813. And it was to provide a place where, in every congressional district, people could look at and read government documents. This programs allows for the most equitable dissemination of government information" to the public. It was based on the idea that an informed citizenry is essential in a democratic society.

A strong system of coordination, including an effective and transparent system to bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The FAR amendment does not create such a system, choosing instead to leave a void in the place of the current effective structure.

The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal

1015

obligations to provide tangible and electronic publications to the Superintendent of Documents. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

Connie Salyers Stoner
Associate Director for Public Services
Clark Memorial library
Shawnee State University
Portsmouth, OH 45662
csalyers@shawnee.edu
<http://library.shawnee.edu>



"Alinia Asmundson"
<alinia@vicinity.com>
12/06/2002 01:18 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1016

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Alinia Asmundson
15 Estabrook Circle
West Lebanon, NH 03784
USA



"Jim Hines"
<jhines@wdtv.com>
12/06/2002 01:19 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1017

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jim Hines
Route 1 Box 26
Jane Lew, WV 26378
USA

1018



"Ryan Sharpe"
<rgsharpe@jps.net>
12/06/2002 01:33 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Ryan Sharpe
2508 H St.
Apartment 6
Sacramento, CA 95816
USA



"Lila Faulkner"
<lfaulkne@law.umaryla
nd.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1019

12/06/2002 03:23 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Lila Faulkner
501 West Fayette Street
Baltimore, MD 21201
USA



"Gia Maddry"
<gmaddry@mmmlaw.com>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

12/06/2002 03:36 PM

1020

In response to Office of Management and Budget (OMB) issued Memorandum No. M-02-07 entitled "Procurement of Printing and Duplicating through the Government Printing Office" (GPO) on May 3, 2002 printed in the Federal Register, Vol. 67, No. 219, November 13, 2002, 68914-8.

Issues I would like to raise re: this proposed amendment are:

1) The proposed amendments are a clear violation of 44 U.S.C. §501 since they authorize agencies to procure their printing outside of GPO.

2) In addition to violating 44 U.S.C. §501, the proposed changes to the FAR violate other Title 44 provisions that neither OMB nor the Department of Justice have ever challenged as unconstitutional:

- §1903 that requires agencies who procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The FAR proposal that the Superintendent of Documents (SuDocs) would bear these costs is contrary to current law.

- §1710 that requires agencies to supply a copy of all publications to the SuDocs for cataloging purposes. How this might be achieved on a comprehensive basis under the proposed FAR is very unclear.

3) While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR are so vague that the result will be more fugitive publications, not fewer. Today, the SuDocs, working with its professional library personnel, provides a strong, centralized, coordinated and managed Federal information dissemination and access program through the FDLP.

4) A strong system of coordination, including an effective and transparent system to bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current effective structure.

5) The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs.

This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

6) Today, the SuDocs is able to ride agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and members of the public depend on GPO's Sales Program to acquire print Government publications.

Law libraries especially depend on the Sales Program to purchase print Federal primary legal materials that may be provided to depository libraries only in an unofficial electronic version. The proposed FAR does not adequately provide for a continued cost effective Sales Program.

As a law librarian, I strongly oppose these efforts to amend the current FDLP

1020

and GPO Sales Programs.

Gia Maddry
Morris, Manning & Martin
3343 Peachtree Road
Suite 1600
Atlanta, GA 30326

1021



"marc daniel"
<zappa@cnw.com>
12/07/2002 03:29 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

marc daniel
119 E Lawrence St
Mount Vernon, WA 98273
USA



"James Walsh"
<james_walsh24@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 03:49 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

James Walsh
1301 W 9th St #201
Austin, TX 78703
USA

1023



"Andrew Lansford"
<andrew@andrewlansford.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 04:26 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Andrew Lansford
634 E. Norman Ave
Arcadia, CA 91006
USA

1024



"John Drabik"
<jdrabik@xmission.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 04:28 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Drabik
757 East Corner Ridge
Draper, UT 84020
USA

1025



"Brian Dunnette"
<brian@dunnette.net>
12/06/2002 04:30 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Brian Dunnette
527 S Russell Ave.
Tucson, AZ 85701
USA

1026



"George Harrington"
<gort3@earthlink.net>

12/06/2002 04:45 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

George Harrington
313 Sun Oaks Ct
Lake Mary, FL 32746
USA

1027



"josh sisk"
<joshsisk@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 04:46 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

josh sisk
7209 25th ave
Hyattsville, MD 20783
USA

1028



"Mark Sebree"
<sebree@fortwayne.inf
i.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/06/2002 05:05 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Mark Sebree
9223 Goldenrod Dr.
Fort Wayne, IN 46835
USA

1029



"Amy J. Madigan"
<Madigan@OLES.com
>

To: "FAR CHANGES (E-mail)" <farcase.2002-011@gsa.gov>
cc:
Subject: Don't privatize public agency printing!

12/06/2002 05:17 PM

Do not do our democracy the disservice of breaking down the information structure it depends on. An informed society is a free society. We have a right, a duty and an absolute need to know how our government is operating and a centralized tax-payer supported public press is the only reliable means. OMB's efforts to have agencies procure printing outside of GPO were defeated twice, in 1987 and 1994, showing Congress' full support for public access and the FDLP. Congress' adamant opposition to this wanton dismantling of the government-to-public information system is further demonstrated by their inclusion of provisions in their continuing resolutions funding government operations (most recently, in H.J.Res. 124) to prevent agencies from using any appropriated funds to procure publications outside of GPO.

The OMB seeks to break federal law and to place the burden of the public to inform themselves about government on the shoulders of that public when we already have an effective affordable system in place that serves the public well.

1) The proposed amendments are a clear violation of 44 U.S.C. §501 since they authorize agencies to procure their printing outside of GPO.

2) In addition to violating 44 U.S.C. §501, the proposed changes to the FAR violate

other Title 44 provisions that neither OMB nor the Department of Justice have ever challenged as unconstitutional:

- §1903 that requires agencies who procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries.

The FAR proposal that the Superintendent of Documents (SuDocs) would bear these costs is contrary to current law.

- §1710 that requires agencies to supply a copy of all publications to the SuDocs

for cataloging purposes.

How this might be achieved on a comprehensive basis under the proposed FAR is very unclear.

3) While attempting to solve the fugitive documents problem, agency responsibilities

in the proposed FAR are so vague that the result will be more fugitive publications, not fewer. Today, the SuDocs, working with its professional library personnel, provides a strong, centralized, coordinated and managed Federal information dissemination and access program through the FDLP.

4) A strong system of coordination, including an effective and transparent system to

bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats

are permanently accessible by the public. The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current effective structure.

5) The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

6) Today, the SuDocs is able to write agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and members of the public depend on GPO's Sales Program to acquire print

1029

Government publications.

Law libraries especially depend on the Sales Program to purchase print Federal primary legal materials that may be provided to depository libraries only in an unofficial electronic version. The proposed FAR does not adequately provide for a continued cost effective Sales Program.

We can't afford not to know how our country is run and if these formerly low-cost and freely accessible sources of information become pricey private-sector enterprise, a few corporations will prosper and the America public becomes the loser.

Amy Madigan
Law Librarian
madigan@oles.com



"Neil Bowers"
<nibowers@bellsouth.net>

12/07/2002 03:05 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1030

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Neil Bowers
5071-B McLendon Dr.
Antioch, TN 37013
USA

1031



"Anthony
Schwickerath"
<schwicke@frii.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 05:26 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Anthony Schwickerath
2548 Romeldale Ln
Fort Collins, CO 80526
USA

1032



"Jeff Sloand"
<pyro@stny.rr.com>
12/06/2002 05:39 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jeff Sloand
1009 Holly Lane
Endwell, NY 13760
USA

1033



"Carmen Hoffman"
<carmen.hoffman@ear
thlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 05:56 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Carmen Hoffman
12004 Captain Bailys Ct
Austin, TX 78753
USA

1034



"Michael Smith"
<mls@nwu.edu>

12/06/2002 06:00 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Smith
1137 Elmwood Ave.
Evanston, IL 60202
USA



"David Gabler"
<eff.org@gablerfamily.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 06:08 PM

10 35

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Gabler
2780 Ferro Carril Rd
Atascadero, CA 93422
USA

1036



"Marcus Sellers"
<vnmh@iup.edu>

12/06/2002 06:13 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Marcus Sellers
12 Clowson Ct
Duncansville, PA 16635
USA

1037



"Michael Schuyler"
<michael@schuyler.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 06:18 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Schuyler
11254 Fieldstone Lane NE
Bainbridge Island, WA 98110
USA

1038



"Tom Wekell"
<Tom@NorthStarGlove.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 06:20 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Tom Wekell
4102 North Mullen
Tacoma, WA 98407
USA

1039



"David Anders"
<dmanders@steelshell
.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 06:29 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Anders
265 Lafayette St
Apt 16B
New York, NY 10012
USA



"daniel feinstein"
<dan668@yahoo.com>
12/06/2002 06:36 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1040

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

daniel feinstein
545 E. 14th Street, Apt.TG
New York, NY 10009
USA



"James Karaganis"
<jimk@certicommco.com>

12/06/2002 07:19 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1041

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

James Karaganis
225 Prairie Ave
Highwood, IL 60040
USA



"David Clark"
<david.clark@reed.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 07:25 PM

1042

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

David Clark
922 SE Lexington St.
Portland, OR 97202
USA



"Robert Stenber"
<acsents2@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 07:55 PM

1043

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Stenber
230 Calle Arroyo
Shandon, CA 93461
USA



"Amy Salo"
<saloa@tcinternet.net>
12/06/2002 08:07 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1044

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Amy Salo
235 Satellite Ln NE
Fridley, MN 55432
USA



"Joseph Hernandez"
<jehernan@mtu.edu>

12/06/2002 08:18 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Joseph Hernandez
910 lakeshore dr
apt 20
Houghton, MI 49931
USA

1045



"Darrell Black"
<darrellblack@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 08:29 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

1046

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Darrell Black
903 S Latson Rd
Suite 204
Howell, MI 48843
USA



"Andrew Romeril"
<aromeril@attbi.com>
12/06/2002 08:38 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I am asking you to **reject the OMB proposal** and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation.

GPO also puts much of this material on the Internet. I would like to see this trend continue to expand. I cannot think of a more timely, cost-effective and environmentally-sensitive manner of distributing information that is, after all, developed primarily using taxpayer dollars.

According to GPO estimates, many agencies fail to deliver electronic copies of their documents. In today's technology-rich environment, this is a **completely unacceptable** state of affairs.

Further, I am concerned that decentralizing the current printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

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Sincerely,

Andrew Romeril
393 De Salle Ter
Fremont, CA 94536
USA

1047



"Steve White"
<steve@despammed.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 03:30 AM

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Steve White
21323 NE 16th St
Sammamish, WA 98074
USA

1048



"Catherine (Cat)
Jefferson"
<oneqtcat@juno.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 09:23 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

1049

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Catherine (Cat) Jefferson
9027 Westmore Rd
San Diego, CA 92126
USA



"Robert Lyle"
<rlyle@oz.net>

12/06/2002 09:32 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Robert Lyle
30452 10th Ave S
Federal Way, WA 98003
USA

1050



"William Arneson"
<williamarneson@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/06/2002 11:15 PM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

William Arneson
2313 Ave B
Apt A
Bradenton Beach, FL 34217
USA

1051



"David Huseth"
<huseth@att.net>

12/06/2002 11:42 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

David Huseth
394 West Second
Elmhurst, IL 60126
USA

1052



"David Dahl"
<david@ddahl.com>
12/07/2002 01:56 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

David Dahl
3450 N. Lakeshore
Chicago, IL 60657
USA

1053



"Joseph Heck"
<heckj@mac.com>
12/07/2002 02:05 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1054

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Joseph Heck
302 Garfield
Seattle, WA 98109
USA



"Arthur Hayden"
<ahhayden@bluefrognet.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 02:23 AM

1055

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Arthur Hayden
1064 California Rd
Gouverneur, NY 13642
USA



"Brian Pugh"
<confidential@rcn.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 02:39 AM

December 6, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Brian Pugh
443A Park St
Redwood City, CA 94061
USA

1056



"Christopher French"
<cf610@rgv.rr.com>

12/07/2002 03:05 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Christopher French
409 Sycamore
McAllen, TX 78501
USA

1057



"Brett Sayles"
<dpopbes@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1058

12/07/2002 03:53 AM

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Brett Sayles
2173 N Wingate Ave
Meridian, ID 83642
USA



"Robert Fisher"
<bobthefisher@athlon
oc.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 03:54 AM

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Robert Fisher
2316 Benson Rd
Westminster, MD 21158
USA

1059



"Brad Oaks"
<bradoaks@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 12:09 PM

1060

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Brad Oaks
550 E Martin St
Raleigh, NC 27601
USA



"Darlene Wyndon"
<d4dar@earthlink.net>
12/07/2002 04:16 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1061

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Darlene Wyndon
139 W. Calaveras Street
Altadena, CA 91001
USA

1062



"Chris Demisch"
<chris@demisch.net>
12/07/2002 04:21 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Chris Demisch
435 Round Hill Rd
Greenwich, CT 06831
USA

1063



"William Ellsworth -
DAV"
<willpe@swbell.net>

12/07/2002 04:34 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

William Ellsworth - DAV
5847 Greencraig Dr.
Houston, TX 77035
USA

1064



"Cliff De Witt"
<cliff@dewitt.net>
12/07/2002 06:56 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Cliff De Witt
712 Chalk Hill Ln
Desoto, TX 75115
USA

1065



"Erik Carlseen"
<erik-eff@planetarik.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 07:08 AM

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Erik Carlseen
6530 Ambrosia Dr. #5104
San Diego, CA 92124
USA

1066



"Theodore Stevko"
<stevko_lists@telocity.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 08:41 AM

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Theodore Stevko
5550 Glenridge Dr NE
Apt. 514
Atlanta, GA 30342
USA



"Robert Brunson"
<brunsonr@swbell.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011
>

12/07/2002 08:48 AM

1067

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Robert Brunson
10530 Countess Dr
Dallas, TX 75229
USA



"Jason Heyd"
<jasonheyd.eff@mailn
ull.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 08:52 AM

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jason Heyd
6 Longwood Dr
Hopkinton, MA 01748
USA

1048



"Heather Undewood
Momberger"
<hammym@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 08:56 AM

1009

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Heather Undewood Momberger
410 Crawford Run Rd.
Creighton, PA 15030
USA



"Norman Council"
<norman.council@min
dspring.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 09:19 AM

1070

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Norman Council
114 Gladstone Road
Lansdowne, PA 19050
USA



"Michael Kilcullen"
<mike@ganksoft.com>
12/07/2002 09:24 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

10 71

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Kilcullen
818 Bedford Rd
Schenectady, NY 12308
USA



"John Kohler"
<jkohler2@earthlink.net>
t>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 09:38 AM

1072

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Kohler
217 Fairlawn Ave.
Daly City, CA 94015
USA



"Julio Orellano"
<otakuboi29@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 09:56 AM

1073

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Julio Orellano
601 Cheyenne Rd # 5
Radcliff, KY 40160
USA



"Theodore Borreson"
<b0okworm1@pacbell.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 10:21 AM

1074

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Theodore Borreson
1210 N Cherokee Ave
#222
Los Angeles, CA 90038
USA



"Todd Robinson"
<mtrob@penguix.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 10:30 AM

1075

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Todd Robinson
15832 Glenarn Dr.
Tampa, FL 33618
USA



"Ann Hatch"
<athatch@wi.rr.com>
12/07/2002 10:45 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1076

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Ann Hatch
N69 W23355 Salem Court East
Sussex, WI 53089
USA



"Robert Harris"
<rbanzai@yahoo.com>
12/07/2002 10:53 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1077

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Robert Harris
5220 Lankershim Bl
North Hollywood, CA 91601
USA



"Shawn Yeager"
<shawn@shawnyeager.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 11:33 AM

1078

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Shawn Yeager
222 Rivanna Ct.
Naperville, IL 60565
USA



"Jason Jelinek"
<eff@jelinekmusic.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 11:50 AM

1079

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jason Jelinek
23 w. 442 spyglass ct.
Naperville, IL 60540
USA



"Dudley Myer"
<dwmyer@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 11:56 AM

1080

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Dudley Myer
412 N Cordova St
Alhambra, CA 91801
USA



"William Platnick"
<wp7599@albany.edu>
12/07/2002 11:57 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1081

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

William Platnick
71 Brevator Street
Floor 1
Albany, NY 12203
USA



"Cameron Henneke"
<cameronh@ameritech
.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 12:03 PM

1082

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Cameron Henneke
3555 N Marshfield Ave
Chicago, IL 60657
USA



"Taz rempel"
<d.rempel@attbi.com>
12/07/2002 12:07 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1083

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Taz rempel
18027 redwood road
Castro Valley, CA 94546
USA



"Sarah Mercure"
<aspiringlibrarian@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 12:10 PM

1084

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Sarah Mercure
912 St. Paul Street
Apt. 1-R
Baltimore, MD 21202
USA



"Rob Hemmick"
<hemmick@hsc.usf.ed
u>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 12:23 PM

1085

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Rob Hemmick
2636 Keystone Ct. N
PO Box 47888
Saint Petersburg, FL 33743
USA



"John Yost"
<jyost@voicenet.com>
12/07/2002 12:27 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1086

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Yost
1660 Sterling Street
Coal Township, PA 17866
USA



"Kevin Sweeney"
<bobthecow@bobthecow.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 12:48 PM

1087

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Kevin Sweeney
414 Griswold Street
Elgin, IL 60123
USA



"Bernie Case"
<berniec@technojunki
e.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 01:15 PM

1088

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Bernie Case
12014 31st Ave NE
Seattle, WA 98125
USA



"Chris Bono"
<cbono@theshop.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 01:25 PM

1089

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Chris Bono
4638 S Toledo Ave
Tulsa, OK 74135
USA



"Regina Hamaker"
<rhamaker1@charter.net>
et>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 01:38 PM

1090

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Regina Hamaker
745 W Scott St
Apt. 110
Fond Du Lac, WI 54937
USA



"George Molinski, Jr"
<gmol@ptc-me.net>
12/07/2002 01:47 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1091

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

George Molinski, Jr
68 Ackley Rd.
Cutler, ME 04626
USA



"John Vermaes"
<jvermaes@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 01:53 PM

1092

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Vermaes
509 So. Placita Quince
Tucson, AZ 85748
USA



"Heather Lewis"
<hdlewis@austin.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 02:00 PM

1093

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Heather Lewis
2819 Foster LN APT F164
Austin, TX 78757
USA



"Noel Shrum"
<ar798@tcnet.org>
12/07/2002 02:21 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1094

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Thank you for your time.

Sincerely,

Noel Shrum
4919 Sessions Dam Rd SW
South Boardman, MI 49680
USA



"Alton Brantley"
<a.brantley@ieee.org>

12/07/2002 02:26 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1095

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to modify the OMB proposal to keep the GPO accountable as the documentation center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. The latter two functions are both invaluable to the general public and increases the accountability for the federal government to keep track of its own materials. According to GPO estimates, many agencies fail to deliver electronic copies of their documents.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

As an alternative to the current model of centralizing the procurement of printing through the GPO, or of the alternative of decentralizing the process and losing valuable information, you might consider a regulatory approach that authorizes departments to execute printing but requiring all disbursements of payment to be through the GPO, contingent upon the GPO receiving the electronic document.

Thank you for your time.

Sincerely,

Alton Brantley
2402 Fox Creek Lane
Davidsonville, MD 21035
USA



"Patrick Owens"
<patrick@oopsclunkth
ud.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 02:27 PM

1096

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Patrick Owens
2029 Church St. SE
Salem, OR 97302
USA



"Gary Miller"
<garyaction@web-park.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 02:36 PM

1097

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Gary Miller
PO Box 231
119 2nd Street
Underwood, IA 51576
USA



"carol wahrer"
<cwahrer@attbi.com>
12/07/2002 02:39 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1098

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

carol wahrer
544 Nightingale st.
Livermore, CA 94550
USA



"Benjamin Williamson"
<blwilliamson@netzer
o.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 03:05 PM

1099

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Benjamin Williamson
1813 N 58th Ave
Pensacola, FL 32506
USA



"Phillip Zampino"
<zampino@squidco.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 03:23 PM

7100

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Phillip Zampino
160 Bennett Ave Apt 6K
New York, NY 10040
USA



"Michael Greene"
<bombadil@oldforest.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 03:26 PM

1101

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Greene
3538 Montwood Court
Marietta, GA 30062
USA



"John Welch"
<me@showtunepink.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 03:34 PM

1102

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

John Welch
305 W 50th St
Apt 8C
New York, NY 10019
USA



"Joseph Crowley III"
<feldspar@cryogen.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 03:41 PM

1103

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Joseph Crowley III
1126 East Street
Dedham, MA 02026
USA



"Joseph Zapert"
<joe@joezapert.com>
12/07/2002 03:41 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1104

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Joseph Zapert
1865 N Fuller Ave #205
Los Angeles, CA 90046
USA



"Craig Paluszcyk"
<gte339u@prism.gatech.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 04:37 PM

1105

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Craig Paluszcyk
1914 Cascade Way
Dalton, GA 30720
USA



"Jeremy Saperstein"
<eff@strenturgent.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 05:02 PM

1106

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jeremy Saperstein
2143 S. Mound Street
Milwaukee, WI 53207
USA



"Jason Smetters"
<blue_theta@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/07/2002 05:14 PM

1107

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jason Smetters
1509 N. 17 Ave.
2E
Melrose Park, IL 60160
USA



"Gregory Zapf"
<x86Daddy@myrealbo
x.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 05:24 PM

1108

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Gregory Zapf
7410 Martingale Xing
#103
Cordova, TN 38016
USA



"David Waggoner"
<davidwag@well.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 06:33 PM

1109

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Waggoner
255 Sunset Dr
Ballwin, MO 63011
USA



"Matthew Strait"
<straitm@mathcs.carleton.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 08:48 PM

1110

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Matthew Strait
811 Wisconsin Ave.
Oak Park, IL 60304
USA



"Yakov Shafranovich"
<yakov@pocketmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 10:10 PM

1111

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Yakov Shafranovich
7602 21st Ave #3D
Brooklyn, NY 11214
USA



"Steven Sloss"
<oostevo@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/07/2002 10:41 PM

1112

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Steven Sloss
5005 Finn Rd
Virginia Beach, VA 23455
USA



"Joshua Lenz"
<JoshuaL24@msn.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/08/2002 12:48 AM

1113

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Joshua Lenz
602 Butler St
De Pere, WI 54115
USA



"David Marcovsky"
<dmarcov@directvinte
rnet.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/08/2002 02:01 AM

1114

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

David Marcovsky
6450 Dougherty Rd
Apt 527
Dublin, CA 94568
USA



"Sean McClung"
<seano71@directvinter
net.com>

12/08/2002 02:32 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1115

December 7, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Sean McClung
712 West Magnolia Ave.
Auburn, AL 36832
USA



"Charles Upson"
<yang@eoni.com>

12/08/2002 04:12 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1116

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

Please keep the GPO in business. In my private life I have found it to be a wonderful example of good government and a personal convenience. As a certified teacher in Oregon it is my opinion that it is also a valuable educational tool. The GPO is a perfect example of when centralized "Big Government" works to the advantage of the citizen rather than against it. If you want to save money vote against any bill that invades our privacy instead, that is the perfect example of bad "Big Government."

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Charles Upson
410 North Main
Union, OR 97883
USA



"Ansley Barnes"
<abarnes@clarku.edu>
12/11/2002 11:16 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1117

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ansley Barnes
950 Main Street
Box 95
Worcester, MA 01610
USA



"Margaret Russell"
<mags62@earthlink.ne
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/08/2002 08:15 AM

1118

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Margaret Russell
15913 Elf Stone Ct
Bowie, MD 20716
USA



"Richelle Siniard"
<escapevelocity@chart
er.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/08/2002 08:56 AM

1119

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Richelle Siniard
1817 W Market St
Athens, AL 35611
USA



"Stephen Gilmer"
<steve@gilmer.com>

12/08/2002 10:24 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1120

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Stephen Gilmer
999 Westbrooke
South Lyon, MI 48178
USA



"Rickey Ramsey"
<poz2001AR@aol.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/08/2002 11:24 AM

1121

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Rickey Ramsey
1812 Reservoir RD APT 297
Little Rock, AR 72227
USA



"Laurie Forti"
<laurie@the-beach.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/08/2002 11:29 AM

1122

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Laurie Forti
5401 Collins Ave Apt 226
Miami Beach, FL 33140
USA



"Suzanne Colligan"
<flynn@bluemoon.net>

12/08/2002 12:46 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1123

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Suzanne Colligan
1 Lafayette Sq.
Buffalo, NY 14203
USA



"James Carey"
<james.carey@pobox.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/08/2002 01:11 PM

1124

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

James Carey
262 Winchester Street
Brookline, MA 02446
USA



"Deb Carver"
<dcarver@OREGON.U
OREGON.EDU>

12/08/2002 01:21 PM

To: farcase.2002-011@gsa.gov
cc: tedsmith@OREGON.UOREGON.EDU
Subject: OIMB's proposed changes in FAR

1125

As a librarian whose institution participates in the Federal Depository Library Program (FDLP), I have serious concerns about the Office of Management and Budget's proposed changes to the Federal Acquisitions Regulations, as published in the Federal Register on November 13, 2002. Our nation has long provided, through the FDLP, for equitable and dependable dissemination of government information in permanent and readily accessible formats. The proposed regulatory changes seriously jeopardize this venerable and valuable government service.

The proposed amendments, which authorize agencies to procure their printing outside of GPO, directly contradict several sections of Title 44 of the United States Code, including 44 U.S.C. §501 and 44 U.S.C. §1903. The responsibilities of government agencies in regard to providing publications for the FDLP are vague and poorly defined, with the likely result being a great increase in the number of "fugitive publications" that are not distributed to libraries and are therefore largely inaccessible to most citizens. The proposal undermines the current effective structure for providing citizen access to government information without establishing any viable system to replace it.

For these reasons, I believe the proposed changes should not be implemented in their current form. While the goal of saving taxpayer money is laudable, the detrimental effects of the proposal far outweigh any possible economic benefits. The implementation of this proposal would have a serious adverse effect on the ability of University of Oregon faculty and students, as well as other citizens whom we serve, to access their government's information.

Deb Carver
University Librarian
University of Oregon Library
541-346-1892
541-346-3485 (fax)



"Michael McLain"
<techdock@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/08/2002 02:16 PM

1126

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael McLain
863 Cardinal Ave
Sierra Vista, AZ 85635
USA



"Paul Westervelt"
<pwesterv@cox.net>
12/08/2002 02:35 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1427

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Paul Westervelt
7 Oaklawn Dr
Metairie, LA 70005
USA



"Eric Ries"
<eries+eff@therestudios.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/08/2002 03:01 PM

1128

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Eric Ries
950 Crane St
Apt 1
Menlo Park, CA 94025
USA



"Ellen Jamieson"
<ellen.jay@verizon.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/08/2002 03:16 PM

1129

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Ellen Jamieson
402 Hillside Ave
Leonida, NJ 07605
USA



"Matthew Makowka"
<mattmm@utdallas.edu
u>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/08/2002 05:14 PM

1130

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Matthew Makowka
2601 N. Floyd Rd.
Richardson, TX 75080
USA



"Chad Russell"
<boomslang@pobox.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/08/2002 06:19 PM

1131

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Chad Russell
401 McElroy Dr
Oxford, MS 38655
USA



"Zachary Holmes"
<zackh@tds.net>

12/08/2002 07:45 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1132

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Zachary Holmes
91 Holt Rd
Wilton, NH 03086
USA



"Rob Richards"
<robr@indra.com>

12/08/2002 11:48 PM

To: farcase.2002-011@gsa.gov
cc: baish@law.georgetown.edu, "Susan Lyons"
<slyons@kinoy.rutgers.edu>
Subject: FAR Case 2002-011

December 9, 2002

1140 South Ames Street, Number 1
Lakewood, Colorado 80232
Telephone: (303) 935-7586
E-mail: robr@indra.com

General Services Administration
FAR Secretariat (MVA)
1800 F Street, Northwest
Room 4035
Attention: Laurie Duarte
Washington, District of Columbia 20405

RE: FAR Case 2002-011

Dear Ms. Duarte:

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program.

I work as a government documents librarian in a Federal Depository Library, which is also a law library. The majority of our library's users are members of the public and the legal profession who intensively use law-related federal government documents in our collection, documents obtained through the FDLP or GPO's Sales Program. The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that our patrons have current, comprehensive, and permanent access to the federal government information they need. I also work directly on the problem of "fugitive documents," that is, federal government publications that by law should be, but are not, made available by federal agencies to GPO for distribution through the FDLP. As a result of leading a committee that has identified more than 100 law-related federal fugitive documents, I am acutely aware of the problem of fugitive government information, and of the indispensable role that GPO plays in providing valuable government information to the public, and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In

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addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents. Further, the proposed language allows agencies to provide GPO with publications in unusable or inappropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means." Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software). The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files). Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Law libraries especially depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program.

Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program. Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents

1133

provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Please do not hesitate to contact me if I can provide further information, and thank you very much for your consideration.

Sincerely,

Robert C. Richards, Jr.

Cc: Mary Alice Baish, American Association of Law Libraries (AALL)
Associate Washington Affairs Representative

Professor Barbara A. Bintliff, AALL Immediate Past President

Susan Lyons, Chair, AALL Government Documents Special Interest Section

The Honorable Ben Nighthorse Campbell, United States Senate

The Honorable Wayne A. Allard, United States Senate

The Honorable Thomas G. Tancredo, United States House of Representatives

The Honorable Robert Beauprez, United States House of Representatives

--

Robert C. Richards, Jr.
1140 S. Ames St. #1
Lakewood, CO 80232
USA
Phone: 303-935-7586
E-mail: robr@indra.com

--



"Abraham Pearson"
<foxlake@mybluelight.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 12:57 AM

1134

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Abraham Pearson
1295 Grizzly Court
Reno, NV 89506
USA



"Dennis Turner"
<dturner@asgllc.biz>
12/09/2002 02:13 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1135

December 8, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Dennis Turner
1219 Westover Ave #5
Norfolk, VA 23507
USA



"Steve Foxx"
<stevefoxx@gruvy.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 07:14 AM

1136

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Steve Foxx
44 Perry Lane
Oxford, CT 06478
USA



"Nathan Moore"
<natedog_1980@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 08:39 AM

1137

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Nathan Moore
2319G S. Providence
Columbia, MO 65203
USA



"Stephen Colson"
<scolson@arbornet.org>

12/09/2002 08:52 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1138

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Stephen Colson
2730 Packard St. Apt D
Ann Arbor, MI 48108
USA



"Keith Moore"
<keithm@netcarrier.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 09:40 AM

1139

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Keith Moore
720 S 15th St Apt 2
Philadelphia, PA 19146
USA



"Evan Hill-Ries"
<evan@stanries.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 10:30 AM

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Evan Hill-Ries
185 Clinton Ave
Apt 4H
Brooklyn, NY 11205
USA

1140



"Averil Jane Townsley"
<averil.townsley@lake
andgov.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 10:42 AM

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Averil Jane Townsley
4855 Magnolia
Mulberry, FL 33860
USA

1141



"steve richardson"
<steve.richardson@fur
man.edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1142

12/09/2002 11:32 AM

I wish to submit my concern in a disturbing development suggested by the Office of Management and Budget recently.

The whole fabric of our constitutional freedoms are bound up in the citizens free access to government information. It is an essential principle of a democratic society and a valuable public good created at taxpayer expense that citizens have access to this information in permanent and readily accessible formats. This condition of democracy has been successfully maintained since the inception of the Federal Depository Library Program (FDLP).

In a move supposedly to curtail expense, the Office of Management and Budget is proposing amendments to the Federal Acquisition Regulation (FAR) that will allow agencies to procure their own printing outside of GPO. You make take a look at the he proposed amendments as they were published in the Federal Register, Vol.67, No. 219, November 13, 2002, 68914-8. What is abundantly clear about this proposition is that it is in clear violation of 44 U.S.C. §501 since they authorize agencies to procure their printing outside of GPO.

In addition this proposal does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the Superintendent of Documents. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats. It is becoming more critical with the plethora of electronic documents that a strong system of coordination, including an effective and transparent system to bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The FDLP is currently the most pervasive public arm battling the digital divide.

I urge you and your office to do all you can to prevent this inconsiderate and undemocratic act to take place.

Steve Richardson
Coordinator of Reference Services
James B. Duke Library
Furman University
Greenville SC 29613



"Shamim Islam"
<shamim@poetryunlim
ited.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/09/2002 11:44 AM

1143

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Shamim Islam
40591 Tamarack Drive
Apt 204
Canton, MI 48188
USA



"Gregory Whalin"
<greg@whalin.com>
12/09/2002 11:52 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1144

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Gregory Whalin
253 10th St Apt 5A
Hoboken, NJ 07030
USA



"Brianna Huber"
<briannahuber@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 12:00 PM

1145

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Brianna Huber
83535 woodland ln
Florence, OR 97439
USA



"Caulfield, Elizabeth"
<ecaulfield@law.howar
d.edu>

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: FAR Case 2002-011

12/09/2002 12:13 PM

1146

Please find below the submission of my comments. I have also included them as an attachment if that makes the submission easier.

December 9, 2002

Via E-mail: Farcase.2002-011@gsa.gov <mailto:Farcase.2002-011@gsa.gov>

Attn: Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street, N.W., Room 4035
Washington, D.C. 20405

RE: FAR case 2002-011

The Government Printing Office (GPO) is not an example of government by "monopoly", as alluded by David M. Walker, Comptroller General of the United States, testifying Feb. 1, 2000 for the U.S. Senate Committee on the Budget. The office represents the pragmatic approach to realize the U.S. government's lofty goal of disseminating administrative materials from innumerable agencies to the American public. The Federal Acquisition Regulation (FAR) Council proposes to amend FAR so that Federal agencies may independently choose methods of printing documents rather than be required to use the program already in place by the GPO.

Under the amendments suggested in FAR Case 2002-001 to implement the Office of Management and Budget's (OMB) Memorandum No. M-02-07, "Procurement of Printing and Duplicating through the Government Printing Office", published in Federal Register, v. 67, no. 219, Nov. 13, 2002, p. 68913-8, each agency may determine and acquire the means most efficient to it for printing its publications. One can imagine a designated number of employees at each agency creating a 'phonebook' of printers, contacting all to determine the logistics of prices and print quantities. Or maybe, as Andrew M. Sherman enlightened us in the Los Angeles Times, December 1, 2002, printing jobs that the GPO currently outsources to small printers might be engulfed by "agency bureaucrats... noncompetitively with federal credit cards, leaving only the big jobs up for grabs." Thus, although the FAR Council purports to improve competition and the job prospects of private printers, small businesses actually will have less chance to benefit from government printing jobs than they currently do with the GPO.

If one considers the issue from a long-term perspective, agencies will simply want to return to the streamlined system the GPO has committed one hundred years to developing. Our Federal employees repeating the legwork of others at fellow agencies ought to surmise, 'Why doesn't a consultant do the similar work of all our agencies? Wouldn't the organization use resources more wisely by assigning the work to one department?' That is how we might describe the role of the GPO, as a sort of government consultant. Our national printing office has proven its prowess as a 'consultant' that can manage the printing directives of a bureaucracy of millions. The GPO knows when to do the printing itself and when to select other avenues for the job. Why should hundreds of agencies assigned the business of enforcing laws and providing vital services to Americans, now try to master another role as small-time printers? Why should Americans jeopardize the work quality of Federal agencies for an unwieldy premise for printing? A sound

1146

mechanism called the Government Printing Office is already in place. The proposed FAR amendments are unclear in assuring that agencies will properly submit publications to the Superintendent of Documents, who would then be responsible to forward them to libraries in the Federal Depository Library Program (FDLP). An academic, law, and FDLP library, such as Howard University Law School's institution, serves at least two populations to be affected by the proposals: 1) a public which asks for currency in government documents and 2) students who are broadening their knowledge of government processes and their perception of how democratic the U.S. Federal government is based on that government's policies for sharing information. The informed status of our country's legal scholars and constituency partly depends on a printing system with a conscience for accountability to the governed.

Please recognize the high-principled motivation of the U.S. Congress in October in passing House Joint Resolution 122, P.L. 107-240, to prevent agencies from receiving funding for printing independent of the GPO. In that resolution for appropriations, Congress specifically determined not to comply with OMB's Memorandum No. M-02-07 and a responsible FAR Council should do the same.

Thank you,

Elizabeth Caulfield
Reference/Government Documents Librarian
Howard University Law Library
2929 Van Ness Street, N.W.
Washington, D.C. 20008

<<GPO.doc>>



GPO.doc



"Roger Jacobs"
<Roger.F.Jacobs.1@nd.edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1147

12/09/2002 12:16 PM

OMB Memorandum NO. M-02-07 calling for amendments to the Federal Acquisitions Regulation by permitting government agencies to contract for printing outside the Government Printing Office continues misguided and previously rejected similar efforts.

I have been a law librarian for forty years. In all of that time, my institutions have relied on the centralized services of the Government Printing Office, and particularly the Federal Depository Library Program to provide students, faculty, and other patrons, timely, complete, permanent access to government information. While Librarian of the Supreme Court of the United States, I enrolled the Court in the Depository Program to insure that its Library would have regular and facile access to government information.

Being in clear conflict with 44 U.S.C. § 1903, and § 1710, the proposed amendments provide no guidance on how the strong, centralized coordinated Federal Depository Program will be continued. The proposed amendments offer no insight on how the low Government Printing Office sales prices will be maintained under a widely distributed model of agency printing. The proposed amendments do not provide Congressional oversight of statutorily mandated agency publishing obligations, nor do they offer the long successful systematic harvesting of agency documents for inclusion in the GPO Federal Depository Library Program.

An informed citizenry is essential for democratic government, and the public availability of government information has long been a cherished American principle. The public has a right to expect this information to be made available by an effective, efficient, dependable, no-fee system. The Federal Depository Library Program is that system. In that the amendments proposed by Memo No. M-02-07 impede this basic and long fruitful system, it must be rejected.

Thank you for your attention.

Roger F. Jacobs
Associate Dean for Library and Information Services
Notre Dame Law School
Kresge Law Library
Post Office Box 535
Notre Dame IN 46556-0535
574 631 5916
FAX 574 631 8154



"Libby Young"
<libby.young@furman.edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1148

12/09/2002 12:32 PM

Re:FAR Case 2002-011

To Whom It May Concern,

I am very concerned about the possibility that proposed amendments to the Federal Acquisition Regulation allowing agencies to procure their own printing outside of the Government Printing Office will have a disastrous effect on the dissemination and access of government information to the public.

There are several matters proposed which will weaken the existing Federal Depository Library Program, a program which does a good job now of distributing and preserving government information. These include:

- Requiring the Superintendent of Documents to bear the cost of publications sent to depository libraries.
- Having a vague or nonexistent system for requiring agencies to submit the documents they print to the Superintendent of Documents for distribution to depository libraries.
- Including no enforcement mechanism to ensure agencies make their publications available to the public.

The Government Printing Office has been able to use agency procurement orders to obtain publications for the depository libraries in a seamless and cost-effective manner. In addition, the Superintendent of Documents and professional library staff have been taking on the challenge of making electronic publications from agency web sites accessible to the public and preserved for the future. GPO and FDLP are effective, non-bureaucratic workhorses of democracy. The proposed changes may seek to save money through printing costs (and this is debatable), but the disruption to the dissemination of information to the public would have costs and repercussions that cannot be estimated.

Please do not pass these ammendments to FAR.

Sincerely,
Elizabeth C. Young
Government Documents Librarian
Furman University
Greenville, SC 29613
(864)294-2260



"Steve Beleu"
<sbeleu@oltn.odl.state
.ok.us>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR regulations

12/09/2002 12:55 PM

1149

Hello,

I would like to briefly comment upon the pending 48 CFR Part 6, 8, and 52 Federal Acquisition Regulations that pertain to "Procurement of Printing and Duplicating Through the Government Printing Office."

I believe that decentralizing Executive Branch printing operations will increase the cost of public printing, and that small business printers will lose many of the printing contracts that help them employ many Americans. The Government Printing Office has worked out printing savings programs to the degree that they are among the cheapest printers, public and private, in our nation today.

The Office of Management and Budget attack upon them is an attack FOR government waste, and an attack upon small business. The main thrust of the revised FAR would be to give lucrative over-cost printing contracts to large printers. Public printing under this revised FAR would cost more and be less available to the public that has paid for it.

GPO has worked out the best, cheapest method of public printing that exists among the nations of this world. Leave it alone. It works.

Steve Beleu
Regional Depository Librarian
Oklahoma Department of Libraries
200 N.E. 18th St.
Oklahoma City, OK 73105-3298



"Kevin Cramer"
<kcramer@siscom.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 01:03 PM

1150

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Kevin Cramer
2330 Ferndown Dr.
Miamisburg, OH 45342
USA



"Eric Shupps"
<eshupps@sentiati.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/09/2002 01:04 PM

1151

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Eric Shupps
3800 Commerce St
Suite 124
Dallas, TX 75226
USA



"Sean Middleditch"
<elanthis@awesomepl
ay.com>

12/11/2002 11:19 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1152

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Sean Middleditch
8355 S. Huron River Dr
Ypsilanti, MI 48197
USA



"Connie Reik"
<connie.reik@tufts.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 01:43 PM

1153

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Connie Reik
93 Lake Ave
Melrose, MA 02176
USA



"david vanthournout"
<thelorax@planet-save
.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 02:01 PM

1154

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

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Sincerely,

david vanthournout
1332 25th
rock island, IL 61201
USA



"Abigail Al-Doory"
<abigail.al-doory@tufts.edu>

12/09/2002 02:52 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1155

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Abigail Al-Doory
86 Powderhouse Blvd
Somerville, MA 02144
USA



"Justin Miller"
<millerjp@purdue.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 03:34 PM

1156

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Justin Miller
621 Waldron St.
Apt 01
West Lafayette, IN 47906
USA



"Chad Bisk"
<CKBisk@BigFoot.Co
m>

12/09/2002 03:43 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1157

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Chad Bisk
11918 Sentinel Point Court
Reston, VA 20191
USA



"Regina Raboin"
<regina.raboin@tufts.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 03:50 PM

1158

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Regina Raboin
PO Box 409
395 Page Street
Lunenburg, MA 01462
USA



"Earlene Kuester"
<kuester@law.stetson.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 03:51 PM

1159

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Earlene Kuester
6500 Briar Ridge Ct.
Pinellas Park, FL 33782
USA



"Pegeen G. Bassett"
<p-bassett@law.northwestern.edu>

To: farcase.2002-011@gsa.gov
cc: baish@law.georgetown.edu, ssimons@kentlaw.edu
Subject: FAR Case 2002-011

12/09/2002 04:04 PM

December 6, 2002

1160

General Services Administration
FAR Secretariat (MVA)
Attention: Laurie Duarte

Concerning FAR Case 2002-011

Dear Ms. Duarte:

I am writing today to oppose the current administration's proposed plan to shift printing away from the Government Printing Office (GPO). I am a law librarian with a specialty in government information. I have worked in this area for over 30 years and I feel this move is extremely misguided.

The Government Printing Office and the Federal Depository Library Program have been an important source of information to U.S. citizens for many years. This particular move has been attempted in the past and thankfully not adopted. When federal agencies do not distribute information through the GPO program, "fugitive" documents exist where scholars and researchers cannot locate copies of these important materials. As a law librarian who uses both electronic and hard copy government materials I can testify to cases of incorrect information put on Web pages and U.S. documents that just disappear. I have recently been working with a law professor (I work for Northwestern University's Pritzker Legal Research Center) who was writing an article and used congressional testimony from a committee web site. When a few months later she went back to the web site the information was no longer there. I am a strong supporter of electronic government information, but I also feel that a centralized printer and distributor of government documents like the Government Printing Office is critical not only for quality control but also for documentation and bibliographic control.

As far as savings cost through outsourcing, I understand that the Government Printing Office already farms out over 84% of its printing to smaller printers.

I also feel this proposal which would allow executive agencies to procure their publication printing without using the Government Printing Office, is a violation of several sections of Title 44 on printing.

This poorly thought out OMB proposal (document 2002-26) does not consider the efficiencies, control, and expertise built into a centralized system of printing through the Government Printing Office.

Sincerely,

Pegeen G. Bassett



"Karen Johnson"
<verns2cents@webtv.net>

12/09/2002 04:14 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1161

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Karen Johnson
1362 Waterloo Ln Apt 36
Gardnerville, NV 89410
USA



"Cyrus Yunker"
<cay4@cornell.edu>
12/09/2002 04:21 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1162

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Cyrus Yunker
1113 Holburn Pl.
Raleigh, NC 27610
USA



"Peter Schroeder"
<pete.schroeder@work
state.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 04:57 PM

1163

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Peter Schroeder
439 Stewart Ave
Columbus, OH 43206
USA



"Rebekah Maxwell"
<maxwell@law.law.sc.edu>

To: Farcase.2002-011@gsa.gov
cc: Baish@law.georgetown.edu
Subject: FAR Case 2002-011

12/09/2002 05:04 PM
Please respond to
maxwell

1164

RE: FAR Case 2002-011

I am writing in protest of the memorandum from OMB's Mitchell E. Daniels, Jr., calling for amendments to the Federal Acquisition Regulation that will permit agencies to contract for printing outside of the GPO. There are a number of things wrong with this idea, not the least of which is the result that will be achieved when taxpayer monies are given to agencies for dissemination of government information through channels that will hinder taxpayer access or render it impossible. To ask taxpayers to fund a system that may eventually trick them out of information is unconscionable.

The amendments are in violation of several provisions of Title 44 of the United States Code, including Sections 501, 1903 and 1710. The proposed changes to FAR will disrupt the production process successfully performed by the GPO and seeks to gut the document control process that is currently being managed by the Federal Depository Library Program. The need for strengthened support of the GPO and the FDLP is as necessary for electronic documents as it is for traditional print documents. However, access to technology is still not 100% equal throughout our nation, and the public needs ongoing access to current government information in permanent print formats.

Daniels' proposed FAR amendments would exacerbate the "fugitive document" problem and, as they provide no continued cost-effective Sales Program, would make it harder for law libraries to purchase print Federal primary material. My library patrons depend on reliable, timely, comprehensive, and permanent access to government information. Government agencies have the legal responsibility to see that they get it.

Please support the right of the American public to equitable, efficient, reliable, no-fee access to government information in permanent and readily-accessible formats. Please oppose the Daniels amendments to the FAR.

Sincerely,
Rebekah Maxwell, J.D., M.L.I.S.
Reference Librarian
Coleman Karesh Law Library
University of South Carolina School of Law
701 Main Street
Columbia, SC 29208
803/777-1659



"LeDoux, Elizabeth"
<eledoux@cov.com>
12/09/2002 05:22 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: Comments for FAR proposed amendments

1165

Director Mitchell E. Daniels Jr. <?xml:namespace prefix = o ns =
"urn:schemas-microsoft-com:office:office" />
Office of Management and Budget

Dear Mr. Daniels,

I am extremely upset by Memorandum No. M-02-07, "Procurement of Printing and Duplicating through the Government Printing Office." The memorandum calls for amendments to the Federal Acquisition Regulation (FAR) that will allow agencies to procure their own printing outside of GPO.

I believe the proposed amendments are a clear violation of 44 U.S.C. §501 since they authorize agencies to procure their printing outside of GPO.

In addition to violating 44 U.S.C. §501, the proposed changes to the FAR violate other Title 44 provisions that neither OMB nor the Department of Justice have ever challenged as unconstitutional:

- §1903 that requires agencies who procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The FAR proposal that the Superintendent of Documents (SuDocs) would bear these costs is contrary to current law.
- §1710 that requires agencies to supply a copy of all publications to the SuDocs for cataloging purposes. How this might be achieved on a comprehensive basis under the proposed FAR is very unclear.

I believe a strong system of coordination, including an effective and transparent system to bring Government publications into the Federal Depository Library Program (FDLP), is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current effective structure.

Today, the SuDocs is able to ride agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and members of the public depend on GPO's Sales Program to acquire print Government publications.

Law libraries especially depend on the Sales Program to purchase print Federal primary legal materials that may be provided to depository libraries only in an unofficial electronic version. The proposed FAR does not adequately provide for a continued cost effective Sales Program.

I strongly urge you to reconsider this proposal.

Elizabeth LeDoux
Research and Conflicts Librarian
Covington & Burling
1201 Pennsylvania Ave



"Fritz Herrick"
<fritzherrick@hotmail.com>

12/09/2002 05:40 PM
Please respond to
fritzherrick

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1166

As a professional librarian, I urge all concerned to oppose the amendments put forth by the Office of Management and Budget in regards to FAR case 2002-011. The proposed changes would make it more difficult for the taxpayers of this country to access the government information they need to be an informed citizenry.

Fritz W. Herrick, MLIS
PO Box 405
Watertown, SD 57201

Help STOP SPAM with the new MSN 8 and get 2 months FREE*



"David Goldberg"
<davidgpo@msn.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 05:37 PM

1167

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

David Goldberg
4632 149th Ave SE
Bellevue, WA 98006
USA



"Lucia Orlando"
<luciao@cats.ucsc.edu
>

12/09/2002 05:48 PM

To: farcase.2002-011@gsa.gov
CC:
Subject: FAR Case 2002-011

1168

FAR Case 2002-011

I am writing as a concerned citizen and Librarian to voice my opposition to the proposed regulation that would decentralize and privatize federal government printing.

The ability of the public to locate, use and have permanent access to documents would be adversely impacted by this rule change. The GPO provides an economical, well run and efficient system to produce, catalog, index and make accessible print and electronic documents to the public. This access to information - vital to an informed populace in any democracy - is a fundamental public good that would be irreparably harmed if the proposed amendment is adopted.

The assertion that the "mandatory steps" in the

1168

proposed rule will improve the distribution of documents to the Federal Depository Library Program (FDLP) is dangerously misleading. While the proposed amendment requires agencies to take a proactive role in ensuring the distribution of information, it offers no other tangible "safety net" to catch any documents that evade this procedure. The language of the amendment provides no congressional oversight, enforcement or accountability measures to ensure that agencies comply with the "mandatory steps."

The move to decentralize and privatize printing is being embraced as a money saving measure. Unfortunately, the proponents of this move ignore the shortcomings inherent in this type of system. While a low-bid system may save a little money, it would favor large publishers and result in diminishing the ability of smaller printers to compete for contracts. A decentralized system of government printing existed in the early days of the United States.

1168

The ensuing rampant corruption, overcharging, and poor quality of printing resulted in the creation of the GPO in 1860. Since its inception, the GPO has provided an invaluable service to the public and the nation by ensuring persistent and enduring access to documents. They deserve our continued confidence and support.

Thank you for your attention to my concerns.

Sincerely,

Lucia Orlando
Reference Librarian
University of California, Santa Cruz

--

Lucia Orlando
Reference Librarian
UC Santa Cruz
Voice: (831) 459-1279
Fax: (831) 459-8206

University Library
1156 High Street
Santa Cruz, California 95064



"Edward Lemon"
<mellon@fugue.com>
12/09/2002 05:48 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1169

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Edward Lemon
1049 W. Barry Ave
Apartment 1E
Chicago, IL 60657
USA



"Melanie Brazzell"
<msb2035@columbia.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 05:51 PM

1170

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Melanie Brazzell
9705 Foxworth Drive
Alpharetta, GA 30022
USA



"Lautretz Moore"
<LMOORE@GPO.gov>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 05:54 PM

1171

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Lautretz Moore
13744 Midvale Ave. N.
Apt. 101
Seattle, WA 98133
USA



"Maria Guye"
<mguye@gpo.gov>
12/09/2002 05:56 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1172

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Maria Guye
3202 54th Avenue NE
Tacoma, WA 98422
USA



"Joseph Goldberg"
<jmgold@u.washington.edu>

12/09/2002 06:00 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1173

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Joseph Goldberg
1610 Belmont Ave
#211
Seattle, WA 98122
USA



"Mindy Goldberg"
<mindyg@u.washingto
n.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 06:00 PM

1174

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Mindy Goldberg
4751 21st Ave NE
Seattle, WA 98105
USA



"Richard Lotz"
<rlotz@u.washington.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 06:07 PM

1175

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Richard Lotz
4227 NE 125th St
Seattle, WA 98125
USA



"Paul Ford"
<pmford@u.washingto
n.edu>

12/09/2002 06:12 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1176

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Paul Ford
4236 11th Ave. NE
#306
Seattle, WA 98105
USA



"Evan Martin"
<martine@cs.washing
otn.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 06:18 PM

1177

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Evan Martin
24435 SE Mirrormont Blvd.
Seattle, WA 98105
USA



"Barbara Goldberg"
<barbara506@aol.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 06:33 PM

1178

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Barbara Goldberg
4632 149th Ave SE
Bellevue, WA 98006
USA



"Jessie Hirsch"
<meow@u.washington.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 06:37 PM

1179

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jessie Hirsch
5243 11th ave ne apt. b
Seattle, WA 98105
USA



"Jason Charrier"
<jcharr1@aol.com>
12/09/2002 06:53 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1180

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jason Charrier
1401 Park St
Jonesville, LA 71343
USA



"Patrick McFadden"
<patrick@antispin.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 06:55 PM

1181

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Patrick McFadden
18227 S.E. 43rd Pl
Issaquah, WA 98027
USA



"Jasmine Hopkins"
<jasmynhopkins@nets
cape.net>

12/09/2002 07:18 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1182

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jasmine Hopkins
711 Summit ave East
Seattle, WA 98102
USA



"Jeanne Pfander"
<jeanpfander@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 07:29 PM

1183

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jeanne Pfander
1726 East Mitchell
Tucson, AZ 85719
USA



"Erik Hustad"
<nails@u.washington.
edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 07:52 PM

1184

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Erik Hustad
4733 17th Ave. NE
Apt. 34
Seattle, WA 98105
USA



"Mike Goldstein"
<cscsman@aol.com>

12/09/2002 08:26 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1185

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Mike Goldstein
4531 144th Ave SE
Bellevue, WA 98006
USA



"Robin Crawford"
<papagena2@juno.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 08:38 PM

1186

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Robin Crawford
7603 Miami Rd.
Mentor On The Lake, OH 44060
USA



"Travis Beck"
<waycool@napanet.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 09:04 PM

1187

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Travis Beck
1810 S Weller St.
Seattle, WA 98144
USA



"Daniel Dillman"
<ddillman@cloudnet.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 09:05 PM

1188

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Daniel Dillman
830 14th Ave S
Saint Cloud, MN 56301
USA



"Michael Nelson"
<misko3000@aol.com>
12/09/2002 09:33 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1189

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Michael Nelson
112 Kimber Ln
Evansville, IN 47715
USA



"Devon DeLapp"
<ddelapp@u.washinton.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 10:00 PM

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Devon DeLapp
4333 9th Ave NE
Seattle, WA 98105
USA

1190



"Vineet Kumar"
<eff@virtual.doorstop.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/09/2002 11:21 PM

1191

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Vineet Kumar
1612 Hopkins St Apt 1
Berkeley, CA 94707
USA



"Benjamin Benigno"
<nebmaster@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 12:03 AM

1192

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Benjamin Benigno
916 Magnolia St
Lake Jackson, TX 77566
USA



"Brian Durham"
<brian@renplanet.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/10/2002 02:41 AM

1193

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Brian Durham
6504 Woodway Drive
Fort Worth, TX 76133
USA



"Neal Fultz"
<njf@cox.net>

12/10/2002 09:42 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1194

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Neal Fultz
3731 SW Worwick Town Road
Topeka, KS 66610
USA



"Elaine Hoffman"
<librab@optonline.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 10:06 AM

1195

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Elaine Hoffman
4 Lillian St.
Port Jefferson Station, NY 11776
USA



"Tasha Walston"
<rockstarbob@livejournal.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 10:18 AM

1196

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Tasha Walston
9004 6th Ave NW
Seattle, WA 98117
USA



"Calvin Thorne"
<calvinthorne@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 10:18 AM

1197

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Calvin Thorne
918 S Lombard Ave
Apt. 2-S
Oak Park, IL 60304
USA



"Gail Saunders"
<gsaunders@fs.fed.us
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 10:26 AM

1198

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Gail Saunders
333 SW 1st. Ave.
Portland, OR 97204
USA



"Susan Hughes"
<shughes@co.monmouth.nj.us>

12/10/2002 01:37 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1199

We STRONGLY OPPOSE OMB's proposed amendments to the FAR.

The proposed amendments are a clear violation of 44 U.S.C. Section 50f, since they authorize agencies to procure their printing outside the Government Printing Office (GPO).

The FAR proposal is contrary to Title 44 Section 1903 by requiring the Superintendent of Documents (SuDocs) to pick up the costs of agencies procuring outside of GPO.

FDLP provides the most experienced and cost efficient way of providing publications to the public.

Fugitive Documents would become more of a problem. Now the SuDocs provides a strong, centralized, coordinated and managed Federal information dissemination and access program through FDLP. The FAR proposal provides no system and leaves a void in place of the current structure.

These amendments would impact access to the our patrons, who deserve to have timely, comprehensive and permanent access to Federal government information in print and electronic formats.

Sincerely,

Susan S. Hughes
Government Documents Librarian
Monmouth County Library
1001 State Highway 35
Shrewsbury, NJ 07702

shughes@shore.co.monmouth.nj.us



"Barbara L. Bell"
<bbell@wooster.edu>
12/10/2002 10:49 AM

To: farcase.2002-011@gsa.gov
CC:
Subject: FAR Case 2002-011

1200

The College of Wooster Libraries participates in the Federal Depository Library Program, selecting close to 40% of the titles available in this program. We serve the research and information needs of the faculty, students, and the community of Wooster and the surrounding area with over 495,000 government publications in our collection.

I am distressed that the OMB is recommending that agencies procure printing outside of the Government Printing Office. We have an excellent centralized, coordinated, and managed system of publishing and distribution in the Government Printing Office that serves participating libraries well. The current system is supported by Title 44 U.S.C. §501.

To allow agencies to seek means of publication other than GPO would be in violation of Title 44 and would make it very difficult for GPO to coordinate distribution of documents that should be available and accessible to the general public.

Title 44 U.S.C. §1903 states that agencies who go outside the GPO must bear the costs of printing and binding copies for depository libraries. The proposed OMB amendment stipulates that GPO bear the cost of supplying copies to the depository libraries. Again, this proposal is contrary to a system that works efficiently and effectively.

In the past when similar attempts were proposed, they have been

1200

defeated. I would urge you to support the Federal Depository Library Program and the Government Printing Office by voting against the OMB amendment.

Barbara L. Bell
Government Information Librarian
The College of Wooster Libraries
1140 Beall Avenue
Wooster, OH 44691
Fax: (330) 263-2253

Barbara L. Bell
Government Information Librarian
Government Information Department
The College of Wooster Libraries
1140 Beall Avenue
Wooster, OH 44691-2364 USA

e-mail: bbell@wooster.edu
fax: (330) 263-2253
tel: (330) 263-2522



"Mike Jeffries"
<majeffries@bpa.gov>
12/10/2002 11:19 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1201

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Mike Jeffries
905 N.E. 11th Ave
Portland, OR 97232
USA



"elizabeth al-doory"
<ealdoory@berklee.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 11:29 AM

1202

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

elizabeth al-doory
81 west wind road #70
Dorchester, MA 02125
USA



"Marvin Eads"
<res0kuoi@verizon.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 11:43 AM

1203

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Marvin Eads
209 Alexander Ct
Irving, TX 75061
USA



"Caishnah Begg"
<caishnah@hotmail.co
m>

12/11/2002 11:21 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1204

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Caishnah Begg
Flat 3/3, tannery Building
48 St andrews Square
Glasgow, G1 5PP
United Kingdom



"Sue L. Center"
<slcenter@facstaff.wisc.edu>

12/10/2002 12:09 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1205

I am writing to strongly oppose amendments to the Federal Acquisition Regulations that will allow agencies to procure their printing outside of GPO. Accessible government information is an essential principle of a democratic society. The Government should provide for equitable, effective, no-fee, efficient and dependable access to and dissemination of government information in permanent and readily accessible formats. A strong, centralized, coordinated and managed federal information dissemination and access program, such as the Federal Depository Library Program (FDLP) is necessary to achieve this important goal.

The proposed amendments, which authorize agencies to procure their printing outside of GPO, are a clear violation of 44 U.S.C. §501. In addition to violating 44 U.S.C. §501 (which OMB and a Department of Justice memo have claimed is unconstitutional), the proposed changes to the FAR violate other Title 44 provisions that neither OMB nor the Department of Justice have ever challenged as unconstitutional:

- ÷§1903 that requires agencies who procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries
- ÷the FAR proposal that the Superintendent of Documents (SuDocs) would bear these costs is contrary to current law
- ÷§1710 that requires agencies to supply a copy of all publications to the SuDocs for cataloging purposes.

Today, the SuDocs, working with its professional library personnel, provides a strong, centralized, coordinated and managed Federal information dissemination and access program through the FDLP. A strong system of coordination, including an effective and transparent system to bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The FAR amendment does not create such a system, choosing instead to leave a void in the place of the current effective structure.

The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

Today, the SuDocs is able to ride agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and members of the public depend on GPO's Sales Program to acquire print Government publications. The

1205

proposed FAR does not adequately provide for a continued cost effective Sales Program.

The OMB Proposed Amendments to the FAR threaten public access and the Federal Depository Library Program.



"Valerie Glenn"
<VGlenn@library.unt.edu>

12/11/2002 10:22 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR case 2002-011

1206

December 10, 2002

ATTN: Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street NW, Room 4035
Washington, DC 20405 <?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />

Re: FAR case 2002-011

I am writing to urge the FAR Secretariat to reject the proposed rule change, as published in the *Federal Register* vol. 67, no. 219, November 13, 2002. My comments concern section A3, Information Distribution: I am firmly of the opinion that, if made effective, the proposed rule change could potentially destroy the Federal Depository Library Program. At the very least, it would severely restrict open access to government information.

My major objections to the proposed rule change are as follows:

1. It is AGAINST the LAW.

Not only does the proposed rule go against 44 USC § 501, which states that all agencies must procure their printing through GPO, but it also runs contrary to 44 USC § 1903 and 44 USC § 1710. These laws, which have not been challenged by any administration as being unconstitutional, state that agencies which do not procure printing through GPO must pay for printing & binding of government publications for the Federal Depository Library Program, and requires agencies to send one copy of every publication to GPO for cataloging of said publication. The proposed rule change would require GPO, not the agencies, to pay for depository library copies.

2. There is no mechanism for enforcement.

The expectations for executive agencies are somewhat vague, as outlined in the proposed rule change. In addition, there is no mechanism for enforcement of even these vague expectations. Currently a large percentage of "fugitive" documents can be directly attributed to those agencies or offices that do not procure their printing through the Government Printing Office. I seriously doubt that having to prepare an annual report for OMB will ensure the cooperation of executive branch agencies. There is no punishment for noncompliance – therefore there is no incentive to comply. The proposed rule change would be directly responsible for a huge increase in fugitive documents, not improve the problem, as is stated in the *Federal Register* notice.

3. It runs contrary to current administration policies & initiatives.

It makes no sense whatsoever to claim that, unlike the Department of Homeland Security, unlike the Federal Enterprise Architecture Program Management Office's (FEAPMO) Business Reference Model, the decentralization of government printing will save money & increase productivity. If you want to take Executive Branch printing out of the hands of a Legislative Branch agency, then do it legally – have legislation introduced, passed, and signed into law by the President.

1206

4. There is no mention of preservation of, or of permanent public access to, these publications.

How will this information be preserved for future generations of American citizens? If there is no mechanism for enforcement, and agencies do not comply, this information will be lost forever. GPO does not only distribute publications to depository libraries, it archives electronic documents for which there is no print equivalent. Are you assuming that the National Archives will do this? And how will the National Archives receive a copy of the publications? What format will they be in?

Furthermore, it does not sound as though the authors of the proposed rule change have spoken with anyone at GPO – the federal depository library program is currently comprised of approximately 60% electronic documents and 40% tangible documents. Perhaps you should refer to the document “Managing the FDLP Electronic Collection: A Policy and Planning Document” (http://www.access.gpo.gov/su_docs/fdlp/pubs/ecplan.html) or the FDLP Electronic Collection FAQs (http://www.access.gpo.gov/su_docs/fdlp/ec/faq.html) in order to get a true sense of the Federal Depository Library Program.

Regarding the Information Distribution clause: if this proposed rule does come into effect, I implore you to include an information distribution clause in every contract. However, it must be strongly worded, unlike the proposed clause. The information distribution clause should specify the format in which publications are to be submitted, and the format should be a *usable* format.

I am firmly opposed to the proposed rule changes, and I urge you to reject them. I think they would cause irreparable damage to the historical record of the United States of America, and would seriously inhibit access to government information for years to come.

Thank you,

Valerie Glenn
Denton, TX
vglenn@library.unt.edu

Valerie D. Glenn
Documents Librarian: Electronic Resources Coordinator
University of North Texas Libraries
P.O. Box 305190
Denton, TX 76203-5190
vglenn@library.unt.edu
940-565-2868
Fax: 940-565-2599
<http://www.library.unt.edu/govinfo/>

1207



"Jeffrey Townshend"
<terrorist@rogers.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 10:18 PM

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Jeffrey Townshend
222 Edinburgh ST
London, ON N6H 1M1
Canada

1208



"Mark Berwind"
<mark_berwind@chart
er.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 09:30 PM

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Mark Berwind
1124 Madison St
Clarksville, TN 37040
USA

1209



"Scott Morgan"
<tiger@gbta.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 08:49 PM

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Scott Morgan
816 S Iowa Ave
Ness City, KS 67560
USA

1210



"Kent Collins"
<OnInMlin@aol.com>
12/10/2002 08:38 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Kent Collins
PO Box 5942
Parsippany, NJ 07054
USA



"Margaret Balfour"
<margaret@bluehurricane.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 07:57 PM

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Margaret Balfour
3524 Telford St. #5
Cincinnati, OH 45220
USA

1211



"Adria P. Olmi"
<olmi@siu.edu>

12/10/2002 06:23 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR-CASE 2002-011

12/2

On Memorandum No. M-02-07 entitled: "Procurement of Printing and Duplicating through the Government Printing Office," issued on May 3, 2002, and printed in the *Federal Register*, Vol. 67, No. 219, November 13, 2002, 68914-8.

As a librarian specializing in providing reference services to law faculty, students, staff, members of the Bar, members of the university, and members of the community, I am concerned about the effect the proposed amendments would have on access to pertinent government information. Southern Illinois University School of Law is a public institution, founded for the public good, and espousing ideals of service and professionalism. The librarians, as members of the faculty, also embrace these ideals.

My service to the community extends beyond law faculty and students who depend upon government publications for their research. Faculty and students from other departments regularly use the law library as do members of the public. Participating in the government depository program is a great benefit to our library as it enhances our ability to meet our patrons' needs. The government depository program provides access to a wide range of publications that are useful for historical and prospective research. In addition, access to government publications increases the ability of the people of this great Republic to engage in dialogue with each other and their representatives, both elected, and those appointed to work in agencies or on the bench. This dialogue is necessary for the health of the body politic. It is necessary for the actual sustaining of the legacy and future of our democratic institutions.

I believe that the OMB's proposed amendments would have a detrimental effect on access to information. Librarians constantly contend with locating and making accessible fugitive documents. Coordination is necessary if electronic and print agency publications will be permanently accessible to the public. If agencies are allowed to circumvent current federal statutory law and find other avenues of publication of documents, coordination of dissemination of government information will be greatly diminished, if not entirely impossible. Since the public pays for these publications to be internally produced, it makes sense that they should have adequate access to them that is as cost-free to them as possible. Procuring of printing outside of GPO will not only lead to disintegration of coordination, but will also put a great burden on the public (both individuals and public institutions) to negotiate with commercial vendors, who will no doubt charge a steep price for government information, and who have no responsibility for providing permanent access.

Under the current regime, the Superintendent of Documents is able to obtain publications for the FDLP and the Sales Program at low cost. This ability to "ride agency procurement orders" is of great benefit to public libraries and should be maintained.

In addition, it appears that OMB's proposed amendments violate federal laws, including 44 U.S.C. sec. 501, 44 U.S.C. 1903.

12/2

Thank you,
Respectfully,

Adria P. Olmi, M.S., J.D.
Reference Librarian and
Assistant Professor

Southern Illinois University
School of Law Library
MailCode 6803
Carbondale, IL 62901-6803
Phone: 618-453-8789
Fax: 618-453-8728



"David A. Cammack"
<david.cammack@sbc
global.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 05:50 PM

12/3

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

David A. Cammack
9237 53rd Street
Riverside, CA 92509
USA

1214



"Simon Hill"
<sdhill@metasystema.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 05:43 PM

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Simon Hill
1510 Hether St.
Austin, TX 78704
USA



"Alice Kober"
<apkober@earthlink.net>

To: farcase.2002-011@gsa.gov
CC:
Subject: Public Access to Government Information is Threatened

1215

12/10/2002 05:43 PM

Dear General Services Administration,

I am writing to express opposition toward the Office of Management and Budget's proposed amendments to the Federal Acquisition Regulation (FAR). The proposed amendments ignore the needs of my patrons. Please do not accept them.

*Access to government information is a key to a free and democratic society.

This is what makes us great. Our government should (and already does) provide for effective, equitable, and efficient access to Government information in permanent and readily accessible formats. The proposed amendments fail to do this.

*The amendments are a clear violation of Federal Law. They violate 44 U.S.C. §501 by allowing agencies to procure their printing outside of the centralized and efficient Government Printing Office system. The proposed changes also violate §1903, which requires agencies that procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The FAR proposal contradicts current law by requiring the Superintendent of Documents (SuDocs) to bear these costs.

*Fugitive documents should be prevented. While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR are so vague that the result will be more fugitive publications, not fewer. SuDocs and its professional library personnel provides a strong, centralized, coordinated, and managed Federal information dissemination and access program through the FDLIP.

*Coordination of information is a necessity. A strong system of coordination is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public.

1215

The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current effective structure.

*Effective enforcement is needed.

The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This change will negatively impact the FDLR and the public's ability to locate, use, and have permanent access to agency publications in all formats.

Respectfully submitted,

Alice Kober
Librarian



"Nancy Buckland"
<bucklandna@jackson
.lib.mi.us>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

12/10/2002 04:51 PM

12/10

December 9, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board,

This is being written in regard to FAR Case 2002-011 regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO).

The proposal, which authorizes agencies to procure their printing outside of GPO, is a violation of 44 U.S.C. Sec. 501.

A strong system of coordination is necessary to bring Government publications into the Federal Depository Library Program (FDLP). This is as crucial in the electronic environment as in the print world to ensure that agency publications in all formats are accessible by the public in a timely fashion. The FAR proposal does not create such a system.

GPO manages the majority of government printing. In addition is it responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents and decentralizing the printing process will complicate the dissemination of electronic information.

OMB cites cost and small business opportunity as reasons for this change. In fact, thousands of small-business printers will lose printing contract opportunities. GPO uses more than 16,000 private printers on the master bid list. More than 70% of contracts were to small businesses. The GPO's central buying power finds "rock-bottom prices" and no duplication of effort that will arise in the OMB recommendation.

Jackson District Library is a selective depository of government documents and our patrons need comprehensive, timely, and permanent access to Federal government information in print and electronic format. This is the only public library depository in the Michigan 7th Congressional District.

I urge you to respect Congress' resolution, HR Res 122, which condemns this measure. Similar unsuccessful attempts were made in 1987 and 1994. Please do not stop the 140 years of tradition.

Thank you for your consideration in this matter.

Sincerely,

Nancy Buckland
Reference Librarian
Government Document Coordinator
Jackson District Library
bucklandna@jackson.lib.mi.us
517-788-4087



"Eric Ryan"
<emr28@cornell.edu>
12/10/2002 04:28 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1217

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Eric Ryan
103 Spring Ln
Ithaca, NY 14850
USA



"Carey Camazine"
<cc@ugo.com>

12/10/2002 04:00 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1218

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Carey Camazine
788 Columbus Ave. Apt 5D
New York, NY 10025
USA



"erik west"
<erikwest@hotmail.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 03:58 PM

1219

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

erik west
650 oak st.
San Francisco, CA 94117
USA

Alan Zoellner
Government Information Librarian
Earl Gregg Swem Library
College of William and Mary
Williamsburg, VA 23187-8794
December 10, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW
Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

1220

Ms. Duarte,

These comments are submitted in regard to FAR case 2002-011.

The proposed amendments to the Federal Acquisition Regulations to implement the policy set forth in OMB Memorandum No. M-02-07, "Procurement of Printing and Duplicating Through the Government Printing Office, should be withdrawn. The stated intention of the proposed rule is "to induce competition, save taxpayer money, and promote small business opportunities. The proposed rule would accomplish none of these ends. In truth, it would probably reduce competition, waste taxpayer money, and reduce small business opportunities. As a librarian, with 25 years of experience in federal depository libraries, I can say unequivocally that the proposed rule would dramatically diminish the availability of executive branch publications in libraries.

The proposed rule would probably reduce competition, because it would substitute FedBizOpps for GPO as the "one-stop gateway" for printing procurement. FedBizOpps is a procurement system designed for contract actions of \$25,000 or more. OMB is proposing to force the FedBizOpps floor down to \$2,500 for printing contracts only. Most, if not all, agency printing contracts are for considerably less than \$25,000, so the small printing businesses that constitute the potential universe of contractors for executive branch agency printing jobs are not users of this system. Indeed approximately 80% of the printing jobs awarded by GPO were for amounts of \$2500 or less. What hardships will be visited upon small printers by transferring printing bid opportunities from the GPO clearinghouse to the FedBizOpps clearinghouse? Why introduce these hardships in the name of increasing competition by reducing monopoly power? How is FedBizOpps as a one-stop clearinghouse less monopolistic than GPO as a one-stop clearinghouse? If this transfer of bid locations is designed to assist the small printers why did Benjamin Cooper, the Executive Vice President of the Printing Industries of America, speak in opposition to the idea at the hearing before the Joint Committee on Printing last July? Perhaps he was aware that GPO awarded 77% of its printing contracts to small businesses during fiscal year 2002, while only 22% of federal prime contracts were

1220

awarded to small businesses. Why has no one volunteered information on what percentage of the contracts bid through FedBizOpps are awarded to small businesses?

The proposed rule would probably increase the expense of government printing and thereby waste taxpayer dollars. While GPO does add a 7% overhead charge to printing contracts handled for executive branch agencies, the agencies are receiving solid value for this charge. The agencies benefit from GPO's long experience in negotiating printing contracts and from quantity discounts available as a result of the volume of business handled by GPO. If agencies are to prepare their own bids, they must hire new personnel or reassign/retrain existing personnel to develop the skills already possessed by GPO staff. (GPO has estimated that 630 full-time equivalent positions would be required for such printing procurement duties across the executive branch if each agency devoted just one-tenth of a staff year to these new duties). Such needless duplication of printing expertise in each agency would cost the taxpayers dearly. GPO staff has estimated that agencies would need to spend an additional \$100 million to \$200 million to come up to printing speed. Perhaps this explains why there is no hue and cry from the agencies for the change proposed by OMB.

The proposed rule would most certainly reduce the number of executive branch publications in federal depository libraries. In 25 years of service in federal depository libraries, I have seen the persistence of the so-called fugitive documents problem. Fugitive documents are those publications of federal entities which are printed outside of GPO procurement procedures. They do not come to federal depository libraries, because the agencies do not meet their U.S. Code Title 44 responsibilities to send them. When the agencies procure their printing through GPO, they do not have to pay for the cost of the depository copies. So depositories receive their copies. When the agencies print outside of GPO, they must by law bear the cost of the depository copies. There is no inducement for the agencies to supply the copies and no penalty when they do not. As a result, fugitive documents proliferate. The proposed rule ignores this lesson of history and promises that more publications would be supplied to depository libraries. But it provides no incentive for supplying them and no penalty for not supplying them. Indeed it makes GPO responsible to pay for the copies. Given its reduced printing business under the revised system, GPO would have no funds available for such purchases. There would be no depository copies, unless each library tried, by purchase or pleading, to make arrangements with each agency to obtain copies of their publications. What a dance of despair! Libraries and agencies would waste time and staff energy in such clumsy, choreographic pursuits. And, if GPO had no copies to distribute to depository libraries, they would probably also have no copies to catalog for the national bibliographic databases. At present, GPO at least tries to create a bibliographic record of all printed and electronic publications passing through their procurement system.

By this point, common sense leads to only one conclusion. To promote competition, reduce unnecessary expense, and maximize public access to federal agency publications, GSA/OMB should withdraw the proposed rule. Yet there remains one other major argument, the legal argument, for withdrawing the proposed rule. It violates current law. Section 501 of Title 44 states "All printing, binding, and blank-book work for Congress,

1220

the Executive Office, the Judiciary, other than the Supreme Court of the United States, and every executive department, independent office and establishment of the Government, shall be done at the Government Printing Office.” The Director of the Office of Management and Budget has pointed to a 1996 memo by a Justice Department attorney to the effect that this clause is unconstitutional. But Justice Department attorneys have not yet acquired the power to decide whether laws are constitutional and to strike down those they deem are not. Until a duly authorized court renders such a verdict or Congress revises the statute, Title 44, Section 501 is still the law of the land. We are a nation of laws, not memos and informal opinions. We cannot brush aside laws when they are inconvenient for a policy maker’s objectives. Rules and proposed rules must be based on statutory authority and not directly contradict such authority. This proposed rule contradicts statutory law and should be withdrawn.

Sincerely yours,

Alan Zoellner
Government Information Librarian
Swem Library
College of William and Mary

\\deptfile\gpovsomb



"Robert Campbell"
<Rob@protovision.org
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/11/2002 02:15 AM

1221

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Robert Campbell
10222 Barbara Anne St
Cypress, CA 90630
USA



"Nathan Hellmers"
<nhellmers@ameritech
.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/11/2002 08:48 PM

1222

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Nathan Hellmers
1213 Chaucer Way Apt A
Fairborn, OH 45324
USA



"Luis Acosta"
<luisma@wizard.net>
12/11/2002 08:21 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1223

To: FAR Secretariat
From: Luis M. Acosta, Esq.
Re: FAR case 2002-011
Date: December 11, 2002

I am a law librarian and a member of the District of Columbia Bar. These comments are submitted in my personal capacity.

I am opposed to the proposed amendments to the Federal Acquisitions Regulations that would allow federal agencies to procure printing outside of the Government Printing Office.

Effective, stable and permanent distribution of governmental information is central a democratic system of government. The Federal Depository Library System is an essential component of our system for the distribution of governmental information, and this system, built up and improved over decades of evolution, should not be weakened. Among other things, the proposed FAR amendments would endanger the current system in which libraries obtain print versions of publications at low cost through the GPO sales program. Access to print versions of publications is important to ensure stable, permanent access by citizens to government information.

In addition, the FDLP is important to maintaining coordination with respect to the distribution of electronic documents. The proposed FAR amendments addressed to the fugitive documents problem does not provide any enforcement mechanism to ensure that agencies would comply, and the proposed solution could very well make the fugitive documents problem worse.

Lastly, the proposed amendments violate the U.S. Code. While OMB apparently has procured an opinion from DOJ asserting that legislative efforts to shore up the FDLP violate the separation of powers, I believe it is of questionable prudence to pick a constitutional fight with the legislature over a proposal of such dubious policy value at a time when there are much more important matters for the government to focus on.

Thank you for your consideration of these comments.

Luis M. Acosta, Esq.
815 G Street, N.E.
Washington, D.C. 20002
(202) 544-7659
luisma@wizard.net

<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />



"Thomas Belote"
<tbelote@mac.com>
12/11/2002 07:58 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1224

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Thomas Belote
41 Grandview St
Apt 205
Santa Cruz, CA 95060
USA



"Leighton, Vernon"
<VLeighton@winona.edu>

To: Farcase.2002-011@gsa.gov
cc:
Subject: FAR case 2002-011 comments

12/11/2002 06:05 PM

1225

From: Vernon Leighton,
Coordinator for public service,
Winona State University

In response to FAR Case 2002-011, proposed changes in 48 CFR 6, 8, and 52

The proposed regulation claims that using the GPO is a serious problem for Executive Agencies to get good quality printing. While there may be problems with the satisfaction with printing through the GPO, it is nevertheless the case that decentralizing the process does not guarantee lower costs or improved service. The proposed regulation gives a vision of a computerized contract bidding process that would improve the competitiveness of the process, but there is no evidence that such a system of bidding could not be established through the GPO. The GPO has been chronically underfunded, so it is little wonder that the GPO has a difficult time delivering a satisfactory product. It would make more sense to adequately fund the GPO, and work with it to improve the contract bidding operation.

The reason that the GPO should not be abandoned is that it provides centralized management for the entire lifecycle of the publication, from its creation to its long-term access and preservation in libraries. This proposal would perhaps save some money on the front end of that cycle (though that remains to be established), but it will certainly increase costs associated with preserving the publications and making them freely available to the general public.

H. Vernon Leighton
Coordinator of Public Service
(and Government Documents)
Winona State University Library
Winona MN 55987
(507) 457-5148
vleighton@winona.edu

My opinions may not be those of my employer
This is not an official message of Winona State University.



"Georgia Chadwick "
<GDCHADWI@lasc.org
>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1226

12/11/2002 06:00 PM

I strongly urge that the amendments proposed by the Office of Management and Budget to 48 CFR Parts 6,8, and 52, "Federal Acquisitions Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO), not be adopted. Adopting these amendments would severely limit public access to federal government information by drastically reducing the number of federal documents distributed through the Federal Depository Library Program (FDLP) and GPO's Sales Program.

I am currently a librarian at a public law library and have worked in a number of other law libraries as well. The documents our library receives through the FDLP provide the public with free access to government information. A great deal of information is available on the websites of various government agencies but not everyone has a computer. Also many publications are still published in paper and the FDLP provides a system to distribute government publications so that our library users have free, permanent access to information they need. The government publishes information for the citizens of the United States and the FDLP provides the best way to distribute it for public use. Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program. Federal law also ensures that federal government information printed through GPO is indexed and lastly that information is preserved for future use. These tasks were quite easy in the many years that information was primarily published in paper format but have become quite complex now that publications are published in many formats. The proposed amendments to 48 CFR Parts 6,8 and 52 would severely damage the current, effective system and would significantly reduce access to federal government information by the public and I strongly urge that they not be adopted.

Georgia Chadwick
Documents Librarian
Law Library of Louisiana
301 Loyola Avenue
New Orleans, LA 70112-1814
gdchadwi@lasc.org
504-568-5704 phone
504-568-5069 fax

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UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

1227

December 11, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, N.W. Room 4035
Washington, D.C. 20405

Attention: Laurie Duarte

Subject: FAR Case 2002-011

Dear Ms. Duarte:

I am writing to express my support for the Federal Acquisition Regulatory Council's proposal to rescind the mandatory requirement to use GPO for all printing requirements. I am also writing to express my concern on three other proposed changes relating to the procurement of printing services: 1) FedBizOpps announcements for printing requirements over \$2,500.00, 2) FedBizOpps announcements for all orders under an indefinite-quantity contract or a requirements contract, and 3) one-year terms for indefinite-quantity contracts or requirements contracts.

Current FAR requirements for announcing a requirement and the elimination of GPO as a mandatory source are sufficient to increase benefits to small businesses and to decrease costs to the Government. The proposal to change the current announcement threshold and to limit to one year the term of indefinite-quantity and requirement contracts could increase the administrative cost of doing business and decrease or eliminate any cost savings to the Government.

I am very concerned with the proposed FAR changes that would require an announcement in FedBizOpps of all printing requirements that are above the \$2,500.00 micro-purchase level and

1227

the requirement to announce all orders under an indefinite-quantity contract or a requirements contract. The current requirements for publication in FedBizOpps of procurements at \$25,000.00 or above should also apply to new printing requirements, and there should be no additional announcement requirement for individual orders under an indefinite-quantity contract or a requirements contract. The proposal to change this threshold, only for printing requirements, will place an undue administrative burden on an agency. The proposed change to announce all printing requirements over \$2,500.00 will require agencies to expend a considerable level of effort to determine the best value.

I am also writing to express my concern on the one-year limit on indefinite-quantity and requirement contracts for printing requirements. A one-year limit does not allow sufficient time for the two parties to learn each other's business practices, which ultimately results in a better service product. It is to the benefit of the small business and the Government to offer at least a two-year or longer term. A two-year or longer contract term would also lessen the administrative cost associated with awarding a new contract annually and would allow the small business to achieve efficiencies in processing repeat requirements.

I urge the FAR Council to consider leaving announcement requirements as they currently appear in the FAR. I also urge the FAR Council to offer a minimum of a two-year contract term for indefinite-quantity and requirement contracts.

Respectfully Submitted.

Jean D. Sefchick
Contracting Officer
Federal Trade Commission



"Larry Jarvis"
<larry.jarvis@dayjarvis
duo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/10/2002 11:28 PM

1228

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Larry Jarvis
2215 Post Rd
Apt. 2108
Austin, TX 78704
USA



"Neill Miller"
<stuff@thecodefactory
.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/11/2002 12:10 PM

1229

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Neill Miller
1657 N. Maplewood Ave.
Apt. #2F
Chicago, IL 60647
USA



"Wagh, Sulbha S."
<swagh@anl.gov>

12/11/2002 11:56 AM

To: "Farcase.2002-011@gsa.gov" <Farcase.2002-011@gsa.gov>
cc:
Subject: FAR Case 2002-011

1230

Dear General Services Administration,

I am writing to express opposition toward the Office of Management and Budget's proposed amendments to the Federal Acquisition Regulation (FAR). The proposed amendments ignore the needs of my patrons. Please do not accept them.

*Access to government information is a key to a free and democratic society.

This is what makes us great. Our government should (and already does) provide for effective, equitable, and efficient access to Government information in permanent and readily accessible formats. The proposed amendments fail to do this.

*The amendments are a clear violation of Federal Law.

They violate 44 U.S.C. §501 by allowing agencies to procure their printing outside of the centralized and efficient Government Printing Office system. The proposed changes also violate §1903, which requires agencies that procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The FAR proposal contradicts current law by requiring the Superintendent of Documents (SuDocs) to bear these costs.

*Fugitive documents should be prevented. While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR are so vague that the result will be more fugitive publications, not fewer. SuDocs and its professional library personnel provides a strong, centralized, coordinated, and managed Federal information dissemination and access program through the FDLP.

*Coordination of information is a necessity.

A strong system of coordination is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current effective structure.

*Effective enforcement is needed.

The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

Respectfully submitted,

Sulbha Swati Wagh
900 Library
Argonne National Laboratory
9700 S. Cass Avenue.
Argonne, IL 60439
630-252-7274



"Heidi Petersen"
<MissSquirrel@wildma
il.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/11/2002 11:34 AM

1231

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Heidi Petersen
762 Lincoln Ave.
San Luis Obispo, CA 93405
USA



"Kim Pinion"
<KPINION@selu.edu>
12/11/2002 11:53 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Proposal 2002-011

1232

Dear Sir/Madam,

I have just read the article, "Government Printing Tug of War Continues", by Miriam Drake, 12/09/2002.

I have several concerns regarding this proposal:

- 1) Eventually public access to government information will be limited.
- 2) Security concerns with ALL government information being printed by private contractors. Since Sept. 11, due to security concerns certain documents are no longer available to the general public, which is completely understandable. I feel that if private printing is allowed this will make government information easier access to enemies of the U.S.
- 3) I don't understand the efficiency of the agency paying for "private" printing costs and then GPO having to pay for printing. Wouldn't this double the expense?
- 4) I agree with Ms. Drake about who is going to monitor the agency to ensure that copies are distributed to the Superintendent of Documents? Wouldn't this also be an additional government expense when GPO is already set up for this function?
- 5) Finally, since when can the Justice Dept. "interpret the constitution"? Will that be the next proposal, to remove the Supreme Court from making decisions regarding the Constitution of the U.S.

Thank you for your attention in this matter.

Kimberly Pinion
59608 Company Rd.
Amite, LA 70422



"Matthew R.
Marsteller"
<matthewm@andrew.c
mu.edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: RE: FAR case 2002-011

12/11/2002 11:44 AM

1 233

Attn: Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street, N.W., Room 4035
Washington, D.C. 20405

I have watched the tug-of-war between OMB and GPO with great concern. I spent nearly ten years with a government contractor operating a government library. In my opinion, the Government Printing Office has done an admirable job with contracting out printing services on behalf of the executive branch departments and agencies. They have worked hard to become a leader in the electronic dissemination of information as well. They have done so well that they have begun to provide electronic document management for the Department of Energy.

It is important to note that there have been certain factions and powerful people that have always been dissatisfied with the efficiency of this arrangement. Now is the time for level-headed government officials to stiffen their backbones and not let these prima donnas have their way. Their hidden agendas are not noble ones by any means. Some don't like the restrictions placed upon the allowed creativity in the production process. Others are simply 'empire building' and wish to take over the task of contracting out printing services. They make wild claims of being more efficient -- keep in mind that this would contradict economy of scale! My worst fear is that some people would like to see the dissemination of government information be as inefficient as possible (by design). A decoupling of the Federal Depository Library Program from the executive branch departments and agencies by circumventing GPO would have an incredibly negative impact on maintaining an informed citizenry.

Think of all of the procurement programs that have been set up to aid small and disadvantaged businesses, minority and women owned businesses, businesses in labor surplus areas -- all of this would have to be redone by not one government agency but numerous ones. How would all of these agencies get these documents to the depository libraries? This would create a costly logistical nightmare that we simply can't afford. Their claims make no sense.

So, please think long and hard before accepting the myths being presented to you. Take it from someone who knows better. Continue with the current system of requiring that these jobs be dealt with by the Government Printing Office alone. Since they contract out the majority of these services, they cannot and should not be viewed as a 'monopoly' as some would have you believe. Don't listen to their sob stories of special cases. There are waiver methods in place to accomodate exceptions.

Sincerely,

Matthew R. Marsteller
Physics and Math Librarian
Engineering and Science Library
4400 Wean Hall
Carnegie Mellon University
Pittsburgh, PA 15213



"Barbara A. Lewis"
<blewis@tln.lib.mi.us>
12/11/2002 09:46 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1234

As the director of a Federal Depository Library, I am concerned about some of the proposed amendments to the Federal Acquisition Regulations (FAR Case 2002-011). While I applaud the OMB's recognition of the need to improve distribution to the Federal Depository Library Program, the proposed amendment does not take into account the need for an enforcement mechanism to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the Superintendent of Documents. The current system which requires all agencies to channel their printing needs through the GPO is certainly not perfect, but it does provide a centralized structure for monitoring what is being published. If under the current system a sizeable number of documents never make their way to the Superintendent of Documents, then it would seem that under a decentralized system without any enforcement mechanism, the number of fugitive documents would vastly increase. I cannot stress too greatly the importance of the Federal Depository Program to the customers that my library serves. It is critical that they have comprehensive access to Federal government information in both print and electronic formats.

Barbara Lewis
City Librarian
Livonia Civic Center Library
32777 Five Mile Road
Livonia, MI 48154
blewis@tln.lib.mi.us



"richard (jr.) spisak"
<janhuss@ix.netcom.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/11/2002 09:03 AM

1235

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

richard (jr.) spisak
18885 SW 357th St
Homestead, FL 33034
USA



"Ask Bjoern Hansen"
<ask@developer.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/11/2002 07:27 AM

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ask Bjoern Hansen
9017 3/4 Rangely Ave
Los Angeles, CA 90048
USA

1236



"Christopher Kain"
<topkai22@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/11/2002 02:41 AM

December 10, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Christopher Kain
340 E. Foothill Blvd.
Claremont, CA 91711
USA

1237

December 6, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW, Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

1238

The Printing Industries of America is pleased to provide the following comments on the proposed amendments to the Federal Acquisition Regulations (FAR) to implement the policy set forth in the Office of Management and Budget (OMB) memorandum No. M-02-07, Procurement of Printing and Duplicating through the Government Printing Office (GPO) (May 3, 2002). The Printing Industries of America (PIA) is the nation's largest printing and graphic arts trade association with more than 13,000 members.

Before commenting on the specifics in the proposal, PIA wishes to address the legal concerns surrounding this proposal. Current law (Title 44, U. S. Code) and actions taken by Congress in the Continuing Resolution passed in December 2002 would suggest that the OMB proposal, if adopted, would place the private industry contractor in the situation of submitting bids in good faith, accepting awards in good faith, and yet, risking non-payment for contracted work. This potential was identified in a letter by the General Accounting Office indicating that payment of contracts in violation of the continuing resolution would be illegal.

Executive Branch employees likewise are hampered by this legal dilemma. Failure to follow the requirements of Title 44 may subject them to citations from the General Accounting Office and seriously impair their ability to work with members of their appropriations and authorizing committees in Congress.

We believe it is imperative that this conflict be addressed to resolve any uncertainty in the printing contracting community prior to the finalization of regulations. It would be inappropriate to place private companies in this uncertain role.

While we recognize that these legal issues must be resolved, it has been the position of the Printing Industries of America that it cannot aid in such a resolution in these comments. We have, therefore, confined the remainder of our comments to issues that affect the integrity and efficiency of the federal print procurement system.

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Also, we have included some overview comments about the federal printing and print procurement program. We have made these suggestions for many years in an effort to assist the government with more efficient buying of information products.

1. The federal government does not have an information planning process nor does it have a printing and publishing plan. This failure to plan has created waste and abuse in the system. For example, federal agencies should be required as part of the budget planning process to submit a printing, information and publishing plan. This plan could be reviewed by the Chief Information Officer of each agency to determine the validity of the plan and whether the plan meets the agency's mission. With the approved plan, the agency could coordinate such plans with the Government Printing Office, develop requests for proposals from private companies, or consider alternative information options. We strongly recommend the implementation of an information planning process.
2. The Executive Branch should conduct an audit of its printing, copying, digital printing and duplicating capacity and commitments to assure that the taxpayer is being served. Printing is the nation's most competitive manufacturing industry. Printing is the largest industry in the United States in terms of numbers of establishments. This means that the federal government can always be assured of a competitive marketplace for printing. For the federal government to purchase equipment is to provide competitive services offered by private industry in every community in America and often invest in technology that can never be fully utilized.
3. In the "Supplementary Information" A. Background, 1. Overview Second bullet, the OMB states, "Providing agencies express authorization to address printing needs by either contracting with a private source or by using the GPO when the GPO offers the best value." This supplementary information and the specifics outlined in 8.801 Policy, subsection (c) are confusing. The implication in this proposal is that a federal agency, after January 1, 2004 would not be able to use the GPO unless such service was part of a competition. The majority of the printing work, which is processed by GPO, is contracted to the private sector. This section would require the agency to ask GPO to seek bids from the private sector while also requiring the agency to seek bids. The section would only apply in those rare instances when the GPO had predetermined that it would produce the printing job in house at the GPO and not contract to the private sector. We believe it would be more beneficial to the government for the agency to ask GPO to either handle the procurement or not. Conducting competing or "dueling" procurements would be unfair to the private companies that must spend time and resources on bidding.

We recommend that agencies continue to be given the latitude and authority to use the Government Printing Office for printing and printing procurement needs based on the unique requirements of the agency. Our proposal was also reflected in the public comments that have been made by OMB officials that the GPO could continue to be used if the agency wished to use the procurement services of GPO.

4. In the section “Supplementary Information” A. Background, 1. Overview Third bullet, OMB states “substantially limiting the circumstances where agencies may rely on in-house or other Executive Branch printing operations.” These comments are reflected in the proposed regulations under 8.801 Policy (a) (3). While we welcome this addition to the regulations, it is a reality that such a competition can always be conducted in a manner that will favor the in-house operation. We urge that OMB adopt a broader policy which states that in-house capacity should be limited to self service copying and duplicating unless issues of national security indicate a need for additional facilities.

Also related to this section is the need for a clear definition of printing. Printing in this sense should include printing, copying, duplicating, and digital printing. There is a regrettable history in the federal government of using limited definitions of printing to allow agencies to avoid the spirit of regulations.

5. In the section “Supplementary Information” A. Background, 1. Overview Fourth bullet, OMB proposes to lower the small purchase threshold to \$2500 to reflect the typical size of printing contracts. We support this change; however, 80 percent of GPO contracts are under \$2500. While we do not propose the creation of a competitive bid program for these very small contracts, we would ask that OMB encourage agencies to implement procurement efficiency plans to buy such jobs from simplified purchase agreements, blanket purchase agreements, multiple award schedules or by combining contracts to reduce procurement costs. We would distinguish this type of procurement from “bundling” in that these contracts would typically be awarded to small, regional printing companies due to the dollar value of the job and the need for quick turn-around.

Also related to this section is a need to address the time required for procurement opportunities to be posted. FAR and FedBizOps provides for a twelve day posting requirement. Printing purchasers in the federal government are accustomed to turn-around times of less than 72 hours. We believe these shorter “posting” requirements times should be included in the new regulations.

6. In the section “Supplementary Information” A. Background, 1. Overview Fifth bullet, OMB addresses the need for “best value” contracts. This is a desirable change for both agencies and printers seeking to do business with the federal government. We believe this change, particularly if combined with the planning process we proposed, will enable the federal government to take advantage of abilities in the modern U. S. printing industry which are currently not being fully utilized. Best value contracts should include opportunities for printers to discuss with agency customers the most effective methods of completing printing jobs and delivering those jobs to the desired audience. Modern printing companies are skilled in pre-press or pre-flighting of work, printing and distribution/fulfillment. Use of modern technologies can significantly reduce agency burden, reduce procurement costs and improve timeliness and quality.

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In conclusion we want to acknowledge the work done by the staff of OMB to develop these proposals. There is a need for general reform and better coordination in the production, procurement and distribution of federal government information. We are hopeful that this proposal will advance that process.

Sincerely,

Benjamin Y. Cooper
Executive Vice President

December 6, 2002

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

1239

REGARDING: FAR Case 2002-011

Dear Sir or Madam:

My comments today regarding the Administration's proposal to shift printing away from the Government Printing Office (GPO) come from my background as a law librarian and as a regular user of government publications.

I have attached my comments to and the response from Representative J. Dennis Hastert. In the letter I sent to his attention, I made handwritten comments on the OMB document 2002-26 that included the memo from Mitchell E. Daniels, Jr., dated May 3, 2002.

In my May 9, 2002, letter to Rep. Hastert, I outlined several points on which the GPO has performed well in its function of disseminating information. Teasingly, I also mentioned that my nearest GPO bookstore would require an enjoyable day trip to Wisconsin. My complaint aside, I brought out the fact that the GPO is intensely fair and accurate. This indexing is critical when seeking to find information that at the time was a minor point – but which becomes a major factor in legislation years down the road.

The costs that are added on to printing jobs seem like an easy way to lop off expenditures. In fact, as previous administrations' proposals in 1987 and 1994 have determined, the opposite is true. In terms of democracy per dollar, the GPO is one of the most effective tools for informing the citizenry of why and how laws are passed or not passed through the Federal Depository Library Program (FDLP).

Under the current system with agencies taking care of their own Web-based materials, one of the presumed cost-saving solutions, materials that are necessary after their immediate dissemination are not available – even with extensive site searching. A recent example was a response I received from the Department of Treasury for a copy of comments made by the Secretary during his Africa tour with Bono. Nearly six months after my query, the Public Information office responded that it would no longer respond to public information queries and would only maintain a FAQ listing on the site. The comments were not picked up by the Department, nor were they retained for future use. The decentralized system, despite requests to do otherwise, created an “orphan document” out of something that appeared widely in the press. To find the comments, a consumer in a relatively short period of time will need to use a paid service to retrieve comments from a public official acting in his official capacity. Decentralizing the process will increase the probability that documentation will be lost or made unavailable to the public.

When federal government agencies do not disseminate information through the GPO auspices, problems abound. Incorrect versions of decisions are put on Web pages, quality control standards are not met, and material just plain and simple fails to be disseminated. More

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than 6300 federal government entities use the GPO. Decentralizing the process may create the appearance of savings, but in fact will create significant problems and associated increased costs to the government and for information consumers.

If the printing industry would have come out in favor of the proposal, this might just be seen as much ado about little, as librarians wring hands and write letters to maintain status quo. The printing industry, the alleged beneficiaries of the new government largess, do not wish to have the change. As it stands, the GPO already outsources 84% of printing when the printing costs themselves can save money. The efficiencies built into the system work to the advantage of the printers under the current system.

Given the requirements that would be necessary in printing, it is highly likely that small printers would not have the resources to compete with the current larger printers that are set up in the cost savings structures on a bid-by-bid system. The amount of capital and expertise to establish a significant government printing operation on a cost-effective basis would swamp the capacity of the small printers to do other business. Low profit margins necessary to underbid other operations would not be made up in volume by a small printer. The current centralized system is better for smaller and larger printers. If the Administration's intent is to support small business, a different mechanism than this proposal is necessary.

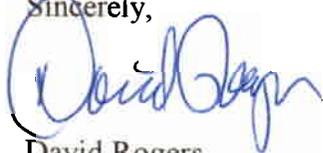
I have also included the comments from the American Association of Law Libraries and comments from a colleague. I concur with their points and their conclusions.

If the proposal would save money and still support the FDLP functions, I could see making the changes that were proposed. As it stands, the proposal does little or nothing to improve the dissemination of information. Disseminating information on a piecemeal basis is not an improvement.

I respectfully request that the proposed rule not be issued. It is a clear violation of 44 USC § 501. The potential for violation of other Title 44 provisions, including §1710, is great. More "fugitive publications" will be created – publications that existed at one time and may be available to an elite few but which are not available to the public. I also ask that the FAR Council respect H.J. Res. 122.

Thank you for your time.

Sincerely,



David Rogers
2089 Conway Lane
Aurora, IL 60504

Attachments:

Letter to Hastert (3 pages)

OMB Memo with handwritten notations (4 pages)

Hastert Response (2 pages)

E-Mail "AALL Urgent Action Alert on OMB Proposal" from Mary Alice Baish (3 pages)

E-Mail "Sample Comments..." from Sara Kelley (1 page)

May 9, 2002

Rep. J. Dennis Hastert
2369 RHOB
Washington, DC 20515-1314

1239
COPY

Dear Mr. Hastert:

Today I am writing as a constituent and as a librarian regarding the Bush Administration's proposal to shift printing of Executive Branch publications from the Government Printing Office (GPO) to private contractors.

The Office of Management and Budget (OMB) proposal is not worth the paper it is printed on, even when transmitted as a .pdf file. Quality of the proposal notwithstanding, I am including a copy for your convenience.

As a law librarian, I have not always been thrilled with decisions made by the GPO. Closing the bookstore in Chicago and directing our people to Milwaukee, Wisconsin, was kind of funny in retrospect. I guess on the map with DC as the center of the universe covering 70% of the page, we're pretty close to each other. Although I haven't actually taken the 90 minute \$20 Amtrak one way trip (4 ½ hours round trip and \$40) to replace a visit to the old bookstore across the street from the Chicago Public Library, I suspect that I will just need to live with the requirement that my patrons will have to plan ahead instead of our being able to obtain items for them in the same day. And there are days where having an excuse to take a trip instead of dealing with attorneys makes the Milwaukee decision a viable, if inefficient option. Closing the office was a budget decision. The rent is cheaper in Wisconsin. Although it is not convenient for me, I can see how the numbers can crunch to justify the decision.⁴

The GPO, however, is intensely fair in the way it makes information available. The information is intensely correct. It is indexed correctly. The information is available and distributed to Depository Libraries – including Wheaton College. Any person can walk in a purchase today's Federal Register at the counter. The counter opens at 8:30 am if memory serves. Show up, stand in line. Pay your fee for the document.

Information is not cheap. Indexing is not cheap. When it comes time for budget cuts, the expertise that comes with quality indexing and authoritative information looks like a nice amount that can be cut without real injury. Unfortunately, information does not necessarily come cheap or easy.

One example came up recently in the Federal Communications Commission Record. Published by the GPO, it is the authoritative version of a variety of materials for the telecommunications industry. There is a lag in publication as the material goes through the editorial process – a lag time that has increased as the various agencies look at backlogs created by September 11 events and try to catch up. A decision was printed in the Federal Register. The correction came out a few weeks later. The Web version of the decision, put out by the FCC, did not reflect the correction. Additionally, the version put out by the agency was of a non-final draft. Tracking

down the appropriate bureaucrat cost our client a fair amount of money and time. Without veracity, government publications only add to noise and confusion.

The 7% premium on outside printing jobs and 14% premium on rush jobs until the agency recoups \$20,000 is actually a pretty good deal for quality control, indexing and distribution.

Two more examples come to mind. One involves your office.

When congressional committees print items without going through the GPO, a couple things happen. First, the print quality, paper quality and binding quality is not up to GPO standards. Choosing the cheaper paper makes the dollar go farther, but the dollar disintegrates in a few years when the acid paper breaks down. GPO materials last for at least a century in my regular experience. Committee printings are lucky to be usable in twenty years. Ink bleeds are much more common in committee printings. Nonstandard sizes for paper are much more common in committee printings. Second, the document will not be disseminated to Government Depository Libraries. If citizens are lucky, the item is microfilmed by private publishers. Even if the item is microfilmed, the ink bleeds and other problems mentioned above create a "best copy available" scenario where legibility suffers. I encounter this phenomenon a few times a year.

The example that involves your office shows what can go wrong when the GPO is not involved in the process of disseminating information from the beginning stages.

As I am sure that you are aware, sometimes legislation takes a really long time to be created. In compiling legislative histories of extensive changes or major legislation, I may need to obtain a dozen documents going back three or more legislative sessions. At the time, a document may seem unimportant when the bill never leaves the committee. Five years later, however, the document can become important if the language espoused becomes law signed by the President.

One such bill was pending before Congress. The administration was busy in rewrites as lobbyists came and went through the meetings. Drafts were disseminated of material that would go into the legislative synopsis after each set of lobbyists got done with their influencing the legislation. Because the bill was handled via the Executive Branch, the drafts of the bill were not handled via the GPO.

The appropriate materials that would become part of the legislative history were transmitted to the office of the Speaker of the House. When the bill was no longer part of that session's agenda, the materials went into some place where no one could find them. Maybe the drafts and materials weren't seen as important. The materials might not have been important....

.... until the same legislative package came up this session. After many calls to the Executive Agency involved and several calls to your Speaker and representative offices, the materials were not retrievable from the transmitted copies. Records were not maintained properly as new officials came in with the change of administrations. The current batch of appointees did not have the expertise at the time to maintain the records as mandated by law. The Freedom of Information Act request cannot retrieve that which has not been retained.

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COPY

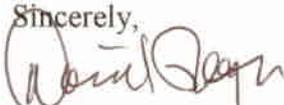
I have not seen the numbers on whether or not the proposal would actually save money. When the same idea was brought up in the Reagan administration, the numbers didn't work. Distributing 5.9 million copies of 14,700 titles is a task where economies of scale through centralization makes more sense. Centralizing the electronic dissemination that is in process makes much more sense as standardization is a critical element.

When the Starr Report came out about President Clinton, it was disseminated under great secrecy. When the electronic version was put up on the Web, it was quickly apparent that the person who put the material into .html made glaring errors on the links. Only the most sophisticated users were able to discern that a full two-thirds of the report was miscoded. Information providers had to go back and reconstruct the material the right way to make the information available to the public. I fear that by decentralizing the process, there is going to be a higher cost associated with a higher error rate. Politicizing printing is poor public policy.

One final example of the folly of decentralization. Each state controls its own printing – or allows printing to be done on an ad hoc basis. The only centralizing figure for the strategic collection of U.S. state publications is the British Library. Decentralizing the process of federal printing would create the same issues for information dissemination.

Some 6300 federal government entities use the GPO for printing and distribution. 6300 federal government offices would need to set up additional procurement personnel to monitor 6300 procurement processes. Outside printers would be trying to bid on 6300 different federal contracts. The alternative is to have a single office handle the printing and a single point for bidding for the jobs among printers.

The OMB proposal does not make sense from a management nor a budget perspective.

Sincerely,

David Rogers
2089 Conway Lane
Aurora, IL 60504

1239



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

FOR IMMEDIATE RELEASE
May 6, 2002

2002-26

OMB Moves to Save Taxpayer Dollars on Printing Costs
Ending GPO Monopoly Could Save \$50 Million - \$70 Million Annually

WASHINGTON -- The Office of Management and Budget (OMB) moved to end the Government Printing Office's (GPO) 141 year-old monopoly on federal printing by allowing private firms to compete for \$500 million worth of federal printing and copying contracts. A copy of the directive follows this release.

"The time has come for the executive branch to liberate its agencies from a monopoly that unfairly penalizes both taxpayers and efficient would-be competitors," said OMB Director Mitchell E. Daniels, Jr.

Opening federal printing to competition could save at least \$50 million to \$70 million annually, or the amount GPO charges to private printing vendors for jobs it outsources. In 2001, GPO performed 16 percent of its work in-house, contracting the remaining 84 percent to private enterprises at a premium.

Each time GPO contracts a job to a private vendor, it:

- charges the department or agency for the cost of the private printing, plus a 7% premium, which doubles to 14% if lead time is ten or fewer days.
- charges an additional processing fee of \$7.50-\$15.00 per order; and
- retains all discounts for prompt payment (usually around 5%) offered by private printers, rather than passing these savings to the department or agency.

The OMB directive would eliminate GPO's role as a broker and allow private firms to bid for printing contracts directly from federal departments and agencies.

The directive, which does not apply to printing sensitive to national security, asks that federal agencies and departments comply by September 1, 2002.

-- memo follows (3 pages) --

Presumes that volume discounts will apply for each of 6300 agencies

The "rush" fee would be more with 6300 individual agencies

Presumes that a quick check can be issued by the government

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May 3, 2002

MEMORANDUM FOR HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: Mitchell E. Daniels, Jr.

SUBJECT: Procurement of Printing and Duplicating through the Government Printing Office

This memorandum sets forth Executive Branch policy with respect to the use of the Government Printing Office (GPO) in handling departmental and agency printing and duplicating needs.

The GPO is a congressional entity controlled by the Joint Committee on Printing. While GPO was originally created to fulfill the printing needs of Congress, Congress has since expanded the role of GPO by requiring that essentially all Executive Branch printing, binding, and substantial reproduction be done by or through GPO.¹ In 1996, however, the Department of Justice's Office of Legal Counsel issued an opinion concluding that Congress *could not* constitutionally obligate Executive Branch departments and agencies to utilize GPO.² Nonetheless, to date the Executive Branch has taken no actions to introduce competition into Executive Branch printing. The time has come for the Executive Branch to liberate its agencies from a monopoly that unfairly penalizes both taxpayers and efficient would-be competitors.

In FY 2001, GPO charged federal departments and agencies \$553 million for printing and duplicating. The vast majority of these costs, however, were for work that GPO contracted out to the private sector. Indeed, in FY 2001, GPO performed only 16% of this printing work in-house, and contracted with private printing enterprises for the remaining 84%. When GPO contracts out with the private sector, it:

- charges the department or agency for the cost of the private printing *plus* a 7% premium, which doubles to 14% if lead time is ten or fewer days;³
- charges an additional processing fee of \$7.50-\$15.00 per order; and
- retains all discounts for prompt payment (usually around 5%) offered by private printers, rather than passing this savings to the department or agency.

These premiums and fees combined likely cost the Executive Branch **\$50 million to \$70**

¹ See 44 U.S.C. § 501 and other authorities. At times, GPO has also interpreted this authority as covering electronic transmissions, such as dissemination by publication on websites.
² See Memorandum from Walter Dellinger, Assistant Attorney General, to Emily C. Hewitt, General Counsel, General Services Administration, May 31, 1996 at 1.
³ GPO charges a 7% to 14% premium for contracted work until it recoups \$20,000 (which occurs on work orders priced over \$285,715). After GPO recovers the initial \$20,000 premium amount, the 7% to 14% premium decreases to 0.5% for the duration of the price of the order.

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million per year, if not more, for work that GPO contracts out to private printers. And even when GPO performs the work in-house, GPO charges departments and agencies a 35% premium if the lead time is ten or fewer days.

While the Executive Branch has long recognized GPO's technical expertise in many specialized areas, rapid developments in information technology have "chang[ed] the way words and images are put on paper" and "blurr[ed] traditional notions of printing and duplicating."⁴ These developments have led past Administrations, and even the Legislative Branch, to re-evaluate the role of the GPO in Executive Branch printing and duplicating over the past decade. In 1994 President Clinton stated that comprehensive reform of Federal printing could "improve the efficiency and cost-effectiveness of Government printing by maximizing the use of private sector printing capability through open competitive procedures and by limiting Government-owned printing resources to only those necessary to maintain a minimum core capacity."⁵ More recently, David M. Walker, Comptroller General of the United States, testified:

When the numbers
work, 84%
is outsourced.

GPO's monopoly-like role in providing printing services perpetuates inefficiency because it permits GPO to be insulated from market forces and does not provide incentives to improve operations that will ensure quality services at competitive prices. Federal agencies could be given the authority to make their own printing policies, requiring GPO to compete with private sector printing service providers.⁶

It is the policy of this Administration to ensure that the federal government receives the best possible deal when spending taxpayers' money. Taxpayers tend to benefit most from open competition, rather than government monopolies. Accordingly, Executive Branch departments and agencies should not be *required* to select GPO when more efficient and cost-effective options are available through the private sector or other avenues. As a matter of Administration policy, Executive Branch departments and agencies should address their printing and duplicating needs under the following guidelines:

- Executive Branch departments and agencies should select printing and duplicating services based upon the best quality, cost, and time of delivery.
- If GPO can provide the better combination of quality, cost, and time of delivery, and if the criteria of 31 U.S.C. § 1535 and 48 CFR § 17.503 (if applicable) are met, then Executive Branch departments and agencies may continue to use GPO printing services. Whenever the private sector can provide the better combination of quality,

4 Memorandum from then Acting OMB Director Alice M. Rivlin to Heads of Departments and Agencies, September 19, 1994 at 1 ("Rivlin Memo").

5 Statement on Signing the Legislative Branch Appropriations Act of 1995, 30 Weekly Comp. Pres. Doc. 1541 (July 22, 1994). See also Rivlin Memo at 1 (stating that government printing reform "should improve the efficiency and cost effectiveness of government printing and duplicating by maximizing the use of private sector printing and duplicating capability through open competitive procedures").

6 See Statement of David M. Walker, U.S. Senate Committee on the Budget, February 1, 2000 at 6-7.

1239

Anyone want to distribute to Depository Libraries as a part of the bidding? Anyone want to index or catalog the material as part of the printing.

cost, and time of delivery, the department or agency should contract with the private sector. This policy applies to printing or duplicating orders that are valued at more than \$1,000 or that are of a continuing or repetitive nature.⁷ The OMB Office of Federal Procurement Policy will make available more detailed guidance on applicable procedures and practices before this policy takes effect.

Subject to OMB Circular A-76, Executive Branch departments and agencies may rely upon agency in-house printing and duplicating operations and agency cross-servicing arrangements only when such in-house operations and agency cross-servicing arrangements offer the best combination of quality, cost, and delivery, based upon a **full account of all costs**. Otherwise, Executive Branch departments and agencies should use GPO or private contractors.

- Departments and agencies are to provide an annual report to the Director of the Office of Management and Budget on the overall cost of their printing and duplicating operations. Reports are to include a full accounting of all costs of work performed by GPO, work performed in-house, and work contracted directly to the private sector.⁸

Accordingly, OMB is recommending that the Federal Acquisition Regulatory Council amend 48 CFR Subpart 8.8 to reflect this policy. Executive Branch departments and agencies that are subject to the Federal Acquisition Regulation should comply with the policies set forth herein upon publication of a FAR rule implementing this Memorandum. All other Executive Branch departments and agencies should comply with the policies set forth in this Memorandum on or before September 1, 2002. For questions regarding changes to 48 CFR Subpart 8.8 or other related acquisition issues, please contact Mr. Robert Burton, Acting Associate Administrator of OMB's Office of Federal Procurement Policy, at 202-395-3302.

⁷ This policy does *not* apply to printing for the Central Intelligence Agency, the Defense Intelligence Agency, National Imagery and Mapping Agency, the National Security Agency, or other printing that, for reasons of national security, a head of a department or agency determines should not be contracted out to GPO or to the private sector.

⁸ Departments and agencies shall continue to ensure that all government publications, as defined in 44 U.S.C. Part 19, are made available to the depository library program through the Superintendent of Documents.

6300 offices can make sure they comply... Or one office takes care of everything — including items that are misplaced or lost.

J. DENNIS HASTERT
14TH DISTRICT, ILLINOIS

THE SPEAKER

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FAX: (202) 225-0697

dhastert@mail.house.gov
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COPY

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(630) 406-1114
FAX: (630) 406-1808

119 WEST FIRST STREET
DIXON, IL 61021
(815) 288-0680
FAX: (815) 288-0743

Congress of the United States
House of Representatives
Washington, DC 20515-1314

May 29, 2002

1239

Mr. David Rogers
2089 Conway Lane
Aurora, Illinois 60504-8549

Dear Mr. Rogers,

Thank you for contacting me to express your concerns regarding a recent change in government printing policy. I appreciate the opportunity to correspond.

On May 3, 2002, Mitchell Daniels, Jr., the Director of the Office of Management and Budget (OMB), issued an official memorandum to the heads of federal departments and agencies. As you know, this memorandum announced a new executive branch policy concerning the procurement of printing and duplicating. Pursuant to this memorandum, the Government Printing Office (GPO) will no longer serve as the exclusive source for printing and, as such, the departments and agencies will be able to select printing and duplicating services through the private sector, the GPO or other avenues.

While the memorandum did not specifically mention competitive bidding for printing contracts, it did direct that all departments and agencies must continue to make all government publications available to the depository library program.

The Federal Acquisition Regulatory Council will now formally modify the printing procurement policy by way of a published rule. Thereafter, all Executive Branch departments and agencies will be expected to comply with the new procurement policy on or before September 1, 2002. The proposed rule will be published in the Federal Register in the near future and, subsequently, a comment period will follow. I would encourage you to submit your comments to the appropriate agency at that time.

You should know that the GPO is a congressional entity originally created to fulfill the printing needs of Congress and controlled by the Joint Committee on Printing. Despite this narrowly defined purpose, the role of the GPO has been expanded over the years to include all Executive Branch printing, binding and reproduction. While the GPO has served the Executive Branch well in producing and disseminating government information, expansive bureaucracy often results in inefficiency and excessive costs.

1239 COPY

Nonetheless, I understand that many have expressed concerns that federal agencies may not comply with depository library obligations and that the new policy may significantly increase government printing costs. I have taken the liberty of forwarding your comments along to the House Committee on Government Reform. You may rest assured that I will carefully monitor the situation as the federal agencies and departments begin to select alternate printing services.

Thank you again for contacting me. Please continue to keep me informed of the matters that concern you most.

Sincerely,

A handwritten signature in black ink that reads "J. Dennis Hastert". The signature is written in a cursive, slightly slanted style.

J. Dennis Hastert
Speaker

JDH:cm

Rogers, David

From: Mary Alice Baish [baish@law.georgetown.edu]
Sent: Wednesday, December 04, 2002 10:23 AM
To: law-lib@ucdavis.edu
Subject: AALL URGENT ACTION ALERT ON OMB PROPOSAL

1239

Friends,

In early June, I sent sent out an important alert asking you to express your opposition to the OMB Memo regarding proposed changes to the FAR that would negatively impact public access to Government information and the FDLP. (<http://www.ll.georgetown.edu/aallwash/aa06072002.html>) Your response to that call for action was well rewarded and members of Congress heard the message loud and clear!

OMB has now issued proposed changes to the FAR and your help is needed once more. Please respond to this alert by submitting comments on the proposed changes by the Dec. 13th deadline and by forwarding this alert to other lists, colleagues and friends.

Thank you, Mary Alice

=====

AALL ACTION ALERT:
URGENT! Comments Needed by December 13th on OMB's Proposed Amendments to the FAR That Threaten Public Access and the Federal Depository Library Program.

BACKGROUND:
Director Mitchell E. Daniels Jr. of the Office of Management and Budget (OMB) issued Memorandum No. M-02-07 entitled Procurement of Printing and Duplicating through the Government Printing Office (GPO) on May 3, 2002. The memorandum calls for amendments to the Federal Acquisition Regulation (FAR) that will allow agencies to procure their own printing outside of GPO. The proposed amendments were published in the Federal Register, Vol. 67, No. 219, November 13, 2002, 68914-8. The deadline for comments is Friday, December 13, 2002.

Accessible Government information is an essential principle of a democratic society and a valuable public good created at taxpayer expense. AALL believes that Government should provide for equitable, effective, no-fee, efficient and dependable access to and dissemination of Government information in permanent and readily accessible formats. AALL further believes that a strong, centralized, coordinated and managed Federal information dissemination and access program, such as the Federal Depository Library Program (FDLP), is necessary to achieve this important goal.

CURRENT CRISIS:
OMB's efforts to have agencies procure printing outside of GPO are not new. Congress, successfully thwarted similar efforts in 1987 and 1994 thereby demonstrating their full support for public access and the FDLP. Members

of the 107th Congress, on a bicameral and bipartisan basis, strongly opposed OMB's proposed amendments to the FAR by including provisions in their continuing resolutions funding government operations (most recently, in H.J.Res. 124) that would prevent agencies from using any appropriated funds to procure publications outside of GPO.

1239

The following talking points will be useful in your comments on the proposed FAR:

1) The proposed amendments are a clear violation of 44 U.S.C. §501 since they authorize agencies to procure their printing outside of GPO.

2) In addition to violating 44 U.S.C. §501, the proposed changes to the FAR violate other Title 44 provisions that neither OMB nor the Department of Justice have ever challenged as unconstitutional:

- §1903 that requires agencies who procure outside of GPO to bear the costs of

printing and binding the necessary copies for depository libraries. The FAR proposal that the Superintendent of Documents (SuDocs) would bear these costs is contrary to current law.

- §1710 that requires agencies to supply a copy of all publications to the SuDocs for cataloging purposes.

How this might be achieved on a comprehensive basis under the proposed FAR is very unclear.

3) While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR are so vague that the result will be more fugitive publications, not fewer. Today, the SuDocs, working with its professional library personnel, provides a strong, centralized, coordinated and managed Federal information dissemination and access program through the FDLP.

4) A strong system of coordination, including an effective and transparent system to bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current effective structure.

5) The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

6) Today, the SuDocs is able to ride agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and members of the public depend on GPO's Sales Program to acquire print Government publications.

Law libraries especially depend on the Sales Program to purchase print Federal primary legal materials that may be provided to depository libraries only in an unofficial electronic version. The proposed FAR does not adequately provide for a continued cost effective Sales Program.

ACTION NEEDED:

Please submit electronic comments on the proposed FAR to farcase.2002-011@gsa.gov

by Friday, December 13th, citing FAR Case 2002-011 in the subject line and the text.

Base your comments on a few of the talking points above, and be sure to talk about the needs of your patrons to have timely, comprehensive and permanent access to Federal government information in print and electronic formats.

1239

Please also fax a copy of your comments to your senators and representative at their Capitol Hill and local offices with a brief note of explanation. If you have a newly elected representative, this is a good time to introduce yourself while explaining the negative impact of OMB's action on public access. (Fax is preferable to e-mail because it provides staff with a tangible version of your comments.)

We are in a crisis situation! Members of AALL and our state chapters have been very instrumental in helping to ward off previous efforts that would harm the FDLP and diminish the public's right to access Government information. I urge all law librarians to submit comments on this very important issue by the December 13th deadline.

I would also appreciate it very much if you would send your comments along to me via e-mail at: baish@law.georgetown.edu.

Thank you very much,
Mary Alice Baish
Associate Washington Affairs Representative
American Association of Law Libraries
202-662-9200
<http://www.ll.georgetown.edu/aallwash/>

Date: December 4, 2002.

Rogers, David

1239

From: Kelley, Sara [SKelley@law.umaryland.edu]

Sent: Monday, December 02, 2002 11:41 AM

To: 'law-lib@ucdavis.edu'

Subject: Sample Comments: FAR Case 2002-011 Federal Acquisition Regulation that would gut Depository Library Program

Law-Libbers:

As you probably know, the OMB and Federal Acquisition Regulation Council have proposed a regulation that would require federal executive branch agencies to outsource printing of their documents to private printers, thus bypassing the GPO. The deadline for comments on this proposed regulation is December 13 (see the notice of proposed rulemaking at <http://a257.g.akamaitech.net/7/257/2422/14mar20010800/edocket.access.gpo.gov/2002/02-28668.htm>). Below is a sample comment letter, based in part on a form letter drafted by the Electronic Frontier Foundation and in part on comments by my co-worker Bill Sleeman, our gov docs librarian. Please send your comments to the FAR at farcase.2002-011@gsa.gov by December 13!

Sara Kelley
Research Librarian
Thurgood Marshall Law Library
University of Maryland School of Law

To the FAR Council:

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

OMB cites cost and small business opportunity as the main reasons for the change. However, in the May 6th issue of *Government Executive* magazine Ben Cooper, a representative of the Printing Industries of America, pointed out that his industry group opposed the change and supported the existing arrangement because "GPO charges fees that most printers would agree are rock-bottom" and because GPO assures in their contract process that printers throughout the country have an opportunity to procure government printing jobs. Furthermore, executive agencies will, in bypassing GPO, have to re-create the structure and staffing which GPO already has in place to coordinate printing and perform the necessary administrative functions needed to follow a printing contract through to a successful completion. It is hard to see how such duplication of effort could possibly save money.

Another area of concern is the effect that the proposed regulation will have on citizen's access to government produced information. Currently, when GPO produces an item for any Federal agency it also arranges for copies to be distributed to over 1,300 Federal Depository Libraries. The proposed regulation would mandate that one copy of any document be provided to GPO for distribution through the depository system. If a hard copy is to be provided to every participating library, then this one supplied copy must now be re-produced in print form, which would necessitate that GPO spend additional tax dollars to create enough copies to distribute. To make matters worse, one has to wonder if GPO would even get the single, mandated copy. Presently, even with government information distribution centralized at GPO, nearly 50% of all government documents are not included in the depository program (as OMB admits). It is ludicrous to suggest that distribution to libraries and users will be improved by decentralizing printing production.

Finally, I urge you to respect H.J. Res. 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

12/4/2002



"Nancy Luzer"
<Nancy.Luzer@castleton.edu>

12/11/2002 04:47 PM

To: Farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1240

December 11, 2002

Re: FAR Case 2002-011

I am writing to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I am opposed to these amendments because they would significantly limit public access to federal government information.

I am the government documents librarian at Castleton State College in Vermont. As the only Federal Depository Library in the southern part of the state, it plays a large role in providing governmental information not only to its students but also to Vermonters in the southern portion of the state.

I am against the adoption of OMB's proposed amendments for the following reasons:

-OMB's proposed amendments would exacerbate the problem of fugitive documents. The proposed regulation absolves the agencies from paying for and providing to GPO the legally required number of copies of each publication for distribution to Federal Depository Libraries. The proposed language allows agencies to provide GPO with publications in unusable or inappropriate formats. For example, large format publications such as atlases or publications containing illustrations that require complex color reproduction (such as some maps or reports containing detailed photographs or diagrams) would be formats for which electronic dissemination is inappropriate. The proposed regulation fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate. This will jeopardize not only the current distribution of documents, but also the long-term preservation of documents for future use.

-In order to ensure that agency publications in all formats are permanently accessible to the public, a strong system of coordinating the cataloging and distribution is necessary. The proposed FAR does not create such a system; in fact it leaves a void in the place of the existing structure. The proposed amendments will negatively impact the public's ability to locate, use, and have permanent access to agency publications in all formats.

Sincerely,

Nancy Luzer
Government Documents Librarian
Calvin Coolidge Library
Castleton State College
Castleton, Vermont 05735



"Krista Rudd"
<Krista.Rudd@law.arizona.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1241

12/11/2002 03:50 PM

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Krista Rudd
8532 east Third Street
Tucson, AZ 85710
USA



CPETRO@dnr.state.m
d.us

12/11/2002 03:47 PM

To: Farcase.2002-011@gsa.gov
cc:
Subject: FAR

1242

I am vehemently opposed to the Office of Management and Budget's proposed amendments to the Federal Acquisition Regulation (FAR). Please do not accept them.

*Libraries proudly provide access to government information bought and paid for by our citizens. Spend a day as a government librarian, and you will realize the value inherent in the current system. We have in place vehicles to provide effective, equitable, and efficient access to Government information in permanent and readily accessible formats. The proposed amendments fail to do this.

*The amendments are a clear violation of Federal Law, 44 U.S.C. §501 by allowing agencies to procure their printing outside of the centralized and efficient Government Printing Office system. The proposed changes also violate §1903, which requires agencies that procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The FAR proposal contradicts current law by requiring the Superintendent of Documents (SuDocs) to bear these costs.

Agency responsibilities in the proposed FAR are so vague that the result will be more fugitive publications, not fewer. SuDocs and its professional personnel provide a strong, centralized, coordinated, and managed Federal information dissemination and access program through the FDLP.

*A strong system of coordination is as necessary, perhaps more so, in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. Electronic documents have to be actively managed over time to insure that we can still read them as new formats, software and hardware are born.

*The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current effective structure.

The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This has a dramatically negative impact on public's ability to locate, use, and have permanent access to agency publications in all formats.

This amendment is a giant step backwards in a progressive age of information. Please discard OMB's proposed amendments.

Respectfully submitted,

Cecelia Petro

Cecelia Petro, Director

Carter Library & Information Resource Center

Maryland Department of Natural Resources

580 Taylor Ave., Annapolis Md. 21401

voice: 410.260.8830 fax: 410.260.8951

cpetro@dnr.state.md.us

<http://www.dnr.state.md.us/irc>

the ultimate search engine: your librarian

Andrew Evans, Documents Librarian

Washburn University Law Library

1700 SW College Ave

Topeka KS 66621

(785) 231-1088 ext. 1787

andrew.evans@washburn.edu

1242

Cecelia Petro, Director

Carter Library & Information Resource Center

Maryland Department of Natural Resources

580 Taylor Ave., Annapolis Md. 21401

voice: 410.260.8830 fax: 410.260.8951

cpetro@dnr.state.md.us

<http://www.dnr.state.md.us/irc>

the ultimate search engine: your librarian



"Patrick Cannon"
<bjc_11370@yahoo.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/11/2002 03:33 PM

1243

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Patrick Cannon
94 Elm Road
Newark, NJ 07105
USA



"Mardi Mahaffy"
<mahaffy@mailclerk.ecok.edu>

12/11/2002 03:16 PM

To: Farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011 Comments

1244

General Services Administration,

I wish to express my strong disapproval of the proposed changes to 48 CFR Part 6,8 and 52, "Federal Acquisition Regulations; Procurement of Printing and Duplicating Through the Government Printing Office."

The GPO is currently an efficient, conscientious agency which oversees printing in a cost effective manner. Should these proposed changes take place, the cost savings OMB has envisioned will not occur. In fact, decentralization of printing will lead numerous agencies to duplicate procurement efforts (including the costs associated with these efforts), and hamper the economies of scale that GPO now achieves. While OMB wishes to increase competition among private printers, the opposite will occur. GPO currently contracts out a significant amount of government printing, and does so in such a way that small businesses are able to compete. These small printers will be shut out of a decentralized printing system, and printing contracts will go to fewer private companies.

More importantly, public access to government information will be hampered if these changes are allowed to take place. GPO recognizes the importance of free access to government information in a democratic society, and is dedicated to providing access in an equitable, permanent fashion. Experience has told us that agencies not relying on GPO for printing are less likely to make their documents available for the Federal Depository Library program. The new regulations will not solve this problem. The wording is too vague to bring about the implementation of an effective dissemination system, nor does it include an enforcement mechanism that would force agencies to comply.

Finally, the proposed regulations violate several legal statutes, including 44 USC 501 which requires agencies to go through GPO for printing, 44 USC 1903, which requires agencies not relying on GPO to cover the cost of printing and binding the necessary copies for depository libraries, and 44 USC 1710, which requires agencies to supply a copy to the Superintendent of Documents for cataloging.

Please do not adopt the changes to 48 CFR parts 6, 8, and 52.

Mardi Mahaffy
Government Documents and Special Collections Librarian
East Central University
Ada, OK 74820
mahaffy@mailclerk.ecok.edu



"Rosemary
Campagna"
<rosemary.campagna
@brooklaw.edu>

To: Farcase.2002-011@gsa.gov
CC:
Subject: FAR Case 2002-011

1245

12/11/2002 02:42 PM
Please respond to
rosemary.campagna

Dear General Services Administration,

I am writing to express opposition toward the Office of Management and Budget's proposed amendments to the Federal Acquisition Regulation (FAR). The proposed amendments ignore the needs of my patrons and I urge you NOT to accept them.

Access to government information is a key to a free and democratic society and the amendments are a clear violation of Federal Law. They violate 44 U.S.C. §501 by allowing agencies to procure their printing outside of the centralized and efficient Government Printing Office system.

At the present time, fugitive documents are already a large problem. If the proposed FAR are implemented, I am sure that the result will be more fugitive publications, instead of less fugitive publications.

GPO provides a strong, centralized, coordinated, and managed Federal information dissemination and access program through the FDLP. I urge you once again, please let them continue their mandated job and do NOT accept the FAR proposals.

Thank you for your time.

Rosemary Campagna
Government Documents/
Reference Librarian
Brooklyn Law School Library
250 Joralemon St.
Brooklyn, New York 11201
718-780-7580
rosemary.campagna@brooklaw.edu



"Michelle Bagley"
<mmbagley@earthlink.net>

12/11/2002 01:55 PM
Please respond to
mmbagley

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR

1246

Dear General Services Administration, <?xml:namespace prefix = o ns =
"urn:schemas-microsoft-com:office:office" />

I am writing to express opposition toward the Office of Management and Budget's proposed amendments to the Federal Acquisition Regulation (FAR). The proposed amendments ignore the needs of my patrons. Please do not accept them.

*Access to government information is a key to a free and democratic society. This is what makes us great. Our government should (and already does) provide for effective, equitable, and efficient access to Government information in permanent and readily accessible formats. The proposed amendments fail to do this.

*The amendments are a clear violation of Federal Law.

They violate 44 U.S.C. §501 by allowing agencies to procure their printing outside of the centralized and efficient Government Printing Office system. The proposed changes also violate §1903, which requires agencies that procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The FAR

1246

proposal contradicts current law by requiring the Superintendent of Documents (SuDocs) to bear these costs.

*Fugitive documents should be prevented. While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR are so vague that the result will be more fugitive publications, not fewer. SuDocs and its professional library personnel provides a strong, centralized, coordinated, and managed Federal information dissemination and access program through the FDLP.

*Coordination of information is a necessity.

A strong system of coordination is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public.

The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current effective structure.

*Effective enforcement is needed.

The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This change will negatively

1246

impact the FDL P and the public's ability to locate, use, and have permanent access to agency publications in all formats.

Respectfully submitted,

Michelle Bagley

--- Michelle Bagley
--- mmbagley@earthlink.net
--- EarthLink: It's your Internet.



"Smith, Jennifer A."
<jesmith@bpl.org>
12/11/2002 01:39 PM

To: Farcase.2002-011@gsa.gov, john_kerry@kerry.senate.gov
cc:
Subject: FAR Case 2002-01

Attn: Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street, N.W., Room 4035
Washington, D.C. 20405
RE: FAR case 2002-011

Dear General Services Administration,

I am writing to express opposition toward the Office of Management and Budget's proposed amendments to the Federal Acquisition Regulation (FAR). The proposed amendments ignore the needs of my patrons. Please do not accept them.

Access to government information is a key to a free and democratic society. This is what makes us great. Our government should (and already does) provide for effective, equitable, and efficient access to Government information in permanent and readily accessible formats. The proposed amendments fail to do this.

The amendments are a clear violation of Federal Law. They violate 44 U.S.C. §501 by allowing agencies to procure their printing outside of the centralized and efficient Government Printing Office system. The proposed changes also violate §1903, which requires agencies that procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The FAR proposal contradicts current law by requiring the Superintendent of Documents (SuDocs) to bear these costs.

Fugitive documents should be prevented. While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR are so vague that the result will be more fugitive publications, not fewer. The Superintendent of Documents and its professional library personnel provides a strong, centralized, coordinated, and managed Federal information dissemination and access program through the Federal Depository Library Program.

Coordination of information is a necessity. A strong system of coordination is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current effective structure.

Effective enforcement is needed. The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the Federal Depository Library Program. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

Respectfully submitted,
Jennifer Smith

Government Documents Librarian

Boston Public Library
700 Boylston Street
Boston, MA 02116

(p) 617-536-5400 ext. 2226
(f) 617-859-2292
(e) jesmith@bpl.org

124M



"Elaine Didier"
<didier@oakland.edu>
12/11/2002 01:24 PM

1248
To: "William Cramer" <wcramer@oakland.edu>, farcase.2002-011@gsa.gov
cc: didier@cliff.acs.oakland.edu, voelck@cliff.acs.oakland.edu
Subject: Re: FAR Case 2002-011

Bill, thank you, very well done! I knew you could do it! I really hope we have an impact. Elaine

At 01:03 PM 12/11/2002 -0500, William Cramer wrote:

>Dear Sirs:

>

> As the coordinator of a government documents collection in a library
> that is part of the Federal Depository Library Program (FDLP), I am
> greatly concerned about OMB's proposed amendment to the Federal
> Acquisitions Regulations (FAR). Assured citizenry access to government
> information is the reason the FDLP exists, and allowing agencies to go
> outside the federal structure to acquire printing by private for-profit
> sources can only severely weaken the depository program. Only by
> retaining all production of government information products within the
> federal structure can it be guaranteed that this information will be
> available to all via our depository libraries.

>The Government Printing Office (GPO) has, over the years, done a
>remarkable job of administering the FDLP, particularly considering the
>budgetary restrictions that it has had to deal with. Implementation of
>the proposed FAR amendment can only serve to weaken the GPO at a time when
>efforts should be made to strengthen it and the FDLP. I hope very much,
>therefor, that this amendment is not adopted.

>

>

> Thank you for the opportunity to let you know what I think about this
> crucial matter.

>

>

>Sincerely,

>

>

>William S. Cramer
>Government Documents Coordinator
>Kresge Library
>Oakland University
>Rochester MI 48307
>wcramer@oakland.edu

Elaine K. Didier, Ph.D.
Dean and Professor, Kresge Library
Oakland University
Rochester, MI 48309-4484
Phone: 248-370-2486
Fax: 248-370-2474
E-Mail: didier@oakland.edu

Past President, Michigan Library Association, 2002-2003



"Eric Dahlen"
<edahlen@umd.edu>
12/11/2002 01:06 PM

To: Farcase.2002-011@gsa.gov
cc:
Subject: FAR case 2002-011

1249

Attn: Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street, N.W., Room 4035
Washington, D.C. 20405

The Government Printing Office (GPO) is not an example of government by "monopoly", as alluded to by David M. Walker, Comptroller General of the United States, testifying Feb. 1, 2000 for the U.S. Senate Committee on the Budget. The office represents the pragmatic approach to realize the U.S. government's lofty goal of disseminating administrative materials from innumerable agencies to the American public. The Federal Acquisition Regulation (FAR) Council proposes to amend FAR so that Federal agencies may independently choose methods of printing documents rather than be required to use the program already in place by the GPO.

Under the amendments suggested in FAR Case 2002-001 to implement the Office of Management and Budget's (OMB) Memorandum No. M-02-07, "Procurement of Printing and Duplicating through the Government Printing Office", published in Federal Register, v. 67, no. 219, Nov. 13, 2002, p. 68913-8, each agency may determine and acquire the means most efficient to it for printing its publications. One can imagine a designated number of employees at each agency creating a 'phonebook' of printers, contacting all to determine the logistics of prices and print quantities. Or maybe, as Andrew M. Sherman enlightened us in the Los Angeles Times, December 1, 2002, printing jobs that the GPO currently outsources to small printers might be engulfed by "agency bureaucrats... noncompetitively with federal credit cards, leaving only the big jobs up for grabs." Thus, although the FAR Council purports to improve competition and the job prospects of private printers, small businesses actually will have less chance to benefit from government printing jobs than they currently do with the GPO.

If one considers the issue from a long-term perspective, agencies will simply want to return to the streamlined system the GPO has committed one hundred years to developing. Our Federal employees repeating the legwork of others at fellow agencies ought to surmise, 'Why doesn't a consultant do the similar work of all our agencies? Wouldn't the organization use resources more wisely by assigning the work to one department?' That is how we might describe the role of the GPO, as a sort of government consultant. Our national printing office has proven its prowess as a 'consultant' that can manage the printing directives of a bureaucracy of millions. The GPO knows when to do the printing itself and when to select other avenues for the job. Why should hundreds of agencies assigned the business of enforcing laws and providing vital services to Americans, now try to master another role as small-time printers? Why should Americans jeopardize the work quality of Federal agencies for an unwieldy premise for printing? A sound mechanism called the Government Printing Office already in place. The proposed FAR amendments are unclear in assuring that agencies will properly submit publications to the Superintendent of Documents, who would then be responsible to forward them to libraries in the Federal Depository Library Program (FDLP). An academic, law, and FDLP library, such as Howard University Law School's institution, serves at least two populations to be affected by the proposals: 1) a public which asks for

1249

currency in government documents and 2) students who are broadening their knowledge of government processes and their perception of how democratic the U.S. Federal government is based on that government's policies for sharing information. The informed status of our country's legal scholars and constituency partly depends on a printing system with a conscience for accountability to the governed.

Please recognize the high-principled motivation of the U.S. Congress in October in passing House Joint Resolution 122, P.L. 107-240, to prevent agencies from receiving funding for printing independent of the GPO. In that resolution for appropriations, Congress specifically determined not to comply with OMB's Memorandum No. M-02-07 and a responsible FAR Council should do the same.

Thank you,

Eric Dahlen
Librarian, Government Documents & Maps
4118 McKeldin Library
University of Maryland
College Park, MD 20742-7011
301.314.1356
edahlen@umd.edu

1250



"William Cramer"
<wcramer@oakland.edu
u>

To: farcase.2002-011@gsa.gov
cc: didier@cliff.acs.oakland.edu, voelck@cliff.acs.oakland.edu
Subject: FAR Case 2002-011

12/11/2002 01:03 PM

Dear Sirs:

As the coordinator of a government documents collection in a library that is part of the Federal Depository Library Program (FDLP), I am greatly concerned about OMB's proposed amendment to the Federal Acquisitions Regulations (FAR). Assured citizenry access to government information is the reason the FDLP exists, and allowing agencies to go outside the federal structure to acquire printing by private for-profit sources can only severely weaken the depository program. Only by retaining all production of government information products within the federal structure can it be guaranteed that this information will be available to all via our depository libraries.

The Government Printing Office (GPO) has, over the years, done a remarkable job of administering the FDLP, particularly considering the budgetary restrictions that it has had to deal with. Implementation of the proposed FAR amendment can only serve to weaken the GPO at a time when efforts should be made to strengthen it and the FDLP. I hope very much, therefor, that this amendment is not adopted.

Thank you for the opportunity to let you know what I think about this crucial matter.

Sincerely,

William S. Cramer
Government Documents Coordinator
Kresge Library
Oakland University
Rochester MI 48307
wcramer@oakland.edu



freamodi@shu.edu
12/11/2002 12:52 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR

1251

Dear General Services Administration,

I am writing to express opposition toward the Office of Management and Budget's proposed amendments to the Federal Acquisition Regulation (FAR). The proposed amendments ignore the needs of my patrons. Please do not accept them.

*Access to government information is a key to a free and democratic society.

This is what makes us great. Our government should (and already does) provide for effective, equitable, and efficient access to Government information in permanent and readily accessible formats. The proposed amendments fail to do this.

*The amendments are a clear violation of Federal Law.

They violate 44 U.S.C. §501 by allowing agencies to procure their printing outside of the centralized and efficient Government Printing Office system. The proposed changes also violate §1903, which requires agencies that procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The FAR proposal contradicts current law by requiring the Superintendent of Documents (SuDocs) to bear these costs.

*Fugitive documents should be prevented. While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR are so vague that the result will be more fugitive publications, not fewer. SuDocs and its professional library personnel provides a strong, centralized, coordinated, and managed Federal information dissemination and access program through the FDLP.

*Coordination of information is a necessity.

A strong system of coordination is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current effective structure.

*Effective enforcement is needed.

The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

Sincerely,

Dierdre M. Freamon

Dierdre M. Freamon
Seton Hall University Law Library
(973) 642-8754
freamodi@shu.edu

1252



"Timothy Trice"
<tpt@yossman.com>
12/11/2002 12:29 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Timothy Trice
334 North Seminary
Madisonville, KY 42431
USA



"Karrie Peterson"
<kapeterson@library.u
csd.edu>

To: Farcase.2002-011@gsa.gov
cc:
Subject: Comments

12/11/2002 07:17 PM

1253

Please find my comments below and attached as a word document.
Thanks.

Via E-mail: Farcase.2002-011@gsa.gov

Attn. Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street N.W., Room 4035
Washington, D.C. 20405

RE: FAR Case 2002-011

I'm writing to oppose the proposed amendments to the Federal Acquisition Regulation (FAR), implementing policy set forth in Office of Management and Budget (OMB) Memorandum No. M-02-07, Procurement of Printing and Duplicating Through the Government Printing Office (May 3, 2002).

The summary describes the motivation for the changes as: 1) inducing competition; 2) saving taxpayer money; 3) promoting small business opportunity; and 4) proposing "specific new actions" that will "improve dramatically the depository library system by ensuring that all government publications are in fact made available to the nation's depository libraries."

It is an important government obligation to save taxpayer money, and commendable to promote small business opportunity, but those goals take second place, in a democracy, to a fundamental principle of guaranteeing permanent public access to government information. Achieving efficiencies at the expense of principles would be a historic wrong turn of enormous proportions.

Fugitive Documents

Many comments you receive will point out that there is an increase of fugitive documents - publications that remain outside of GPO cataloging and the Federal Library Depository Program -when agencies print without recourse to the GPO. Uncatalogued and undistributed government information will likely remain hidden from the public and is a failure of government accountability, undermining the ability of citizens to participate in government and impairing access to information gathered and published at taxpayer expense.

The proposed amendments attempt to address this problem by directing that a clause be put in contracts with commercial printers instructing them to send one copy of each document to the GPO. The rule changes also clearly state that "For each government publication to be printed, the agency shall ensure a copy of the publication is provided to the GPO's Superintendent of Documents..." Good language, but where is enforcement when this doesn't happen? The proposal states that "...agencies will be required, as part of their reporting on printing, to report to the OMB on compliance with their obligation to make information available to the public, including through the FDLIP."

1253

This sounds to civic-minded people like no enforcement at all, given the abysmal track record of the OMB with regard to public access to public information:

- * OMB established no enforcement against fugitive documents at the time of the OMB Circular No. A-130.
- * OMB has allowed copyrighting or copyright-like barriers of government information on privately printed publications.
- * OMB did not enforce implementation of the 1996 amendments to FOIA.
- * OMB allowed the transfer of the journal of the Journal of the National Cancer Institute (JNCI) from the federal government to Oxford University Press, and that company now holds the copyright even though government employees work on the JNCI and content is based on taxpayer-funded research. (footnote-see Word version)

It's heartening to see an attempt made to combat fugitive documents, but it's disturbing to see the key issue of enforcement vaguely left up to the OMB when that agency has not earned public confidence as a guardian of civic interests that reach beyond saving money.

Also disturbing is language asking that agencies allow the GPO to ride print publishing requests by giving the GPO prior notice "when feasible." It sounds like leaving the barn door open, especially if the only avenue for redressing abuse is via the OMB.

Unless the enforcement problem can be solved, it seems preferential from the standpoint of public access to government information to reaffirm the GPO as the centralized print procurement agent, so that we leave intact the best method we have established so far to combat fugitive documents.

The GPO And Public Access

No doubt there are changes that can and should be made at GPO to solve publishing problems federal agencies are experiencing. These rule changes, however, seem to be aimed at getting the GPO to make changes by throwing open the doors to market competition. Librarians have a long history with market forces and the often deleterious effect on public access to information: the struggle against privatization and "paying twice" for taxpayer-funded research only available commercially; the continual industry pressure that government not "compete" with the private sector, which has recently led to significant losses in the public domain; attempts to gain copyright control over data, and so on. The market may correct some problems-it will not by itself lead to guaranteed permanent public access.

Because the GPO administers the Federal Depository Library Program and interacts with the library community continuously, they are well aware of publishing issues that help or hinder public access and can advise agencies and commercial companies for best practices. For example, it may not matter to in-house agency customers if certain types of bibliographic information are published as part of a NASA report, but it matters greatly for catalogers who produce the records by which that same report can be tracked down decades later by researchers. And it may not matter to in-house agency customers if all the data on a CD-ROM or DVD is accessible only via proprietary software, but the GPO is aware that data files may also need to be provided in simple ascii format so that they are still accessible to researchers long after the proprietary software has become unusable. Because of the many librarians participating in the FDLDP, there is a feedback loop through the GPO that enables the needs of citizen stakeholders to be considered in the

1253

publishing of government information.

Under the current rule changes, how will the needs of the people who use libraries to access government information-citizens, scholars, researchers, students, small business, community activists, local government officials, journalists-be heard by all the agencies who do their printing outside the GPO?

The summary states that the OMB will determine when agency publication practices need to be changed to "ensure maximum possible reliance on distribution in cost-effective electronic formats." This is a perfect example of a potential conflict between the government's proactive responsibility to distribute publications and its obligation to cut costs. Will the OMB feel that the public is adequately served if a popular report that is several hundred pages long is only distributed electronically, thereby forcing citizens who want to read it either to print out the report themselves or to buy it? Will the OMB concern itself with the future preservation of various types of electronic information, or will it only consider the short term cost savings? I believe most citizens feel their tax dollars are well spent insuring that appropriate and usable formats are adopted for government publishing and, again, because of the GPO's relationship with libraries through the FDLIP, they are in a very good position to advocate for this.

The Process Seems Wrong

Also shaking public confidence, with regard to the rules changes, is the clear disregard for Title 44. Title 44 is statutory protection for public access to government information, and was passed into law by elected officials of the American people. It strains credibility that we should be asked to accept OMB memos and rule changes geared primarily toward bottom line concerns as if this important law did not even exist.

I believe that the best solution for agency publishing problems will be one that adequately addresses the concern for public access to government information as well as the needs of agencies to cut costs and streamline procedures. I believe it is possible to find a better solution than these proposed rule changes. I would urge the FAR Secretariat not to follow the lead of the OMB in spurning cooperation with Congress-a cooperation that many citizens perceive as a beneficial "check and balance" of open government-and to withdraw these proposed rules in favor of a solution that protects vital public interests.

Respectfully submitted,
Karrie Peterson
Government Information Librarian
University of California, San Diego



GPO-OMB-FAR.doc



"David Mizener"
<davem@panam.edu>
12/12/2002 12:25 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR case 2002-011

1 254

The efforts of the staff of the Government Documents Department of the University of Texas-Pan American Library have been to provide free, timely and permanent access by Mexican American students and citizens in the 15 congressional district to Federal Government information in print and electronic formats through the FDLP.

We endorse the ALA belief that government should provide for equitable, effective, no-fee, efficient and dependable access to and dissemination of government information in permanent and readily accessible formats. The Federal Depository Library program is necessary to achieve this important goal.

Action by the Office of Management and Budget memorandum No. M-02-07 to amend FAR to permit government agencies to procure printing and binding outside of the Superintendent of Documents is a clear violation of 44 U.S.C. 50 and other title provisions and will make it more difficult for this Federal Depository to provide Federal information to students of University of Texas-Pan American and people of the 15 congressional district. Dr. David Mizener, Depository Coordinator.



"Eric Ewald"
<EEwald@tyreeorg.co
m>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1255

12/12/2002 12:23 PM

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program.

The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that our citizens have current, comprehensive, and permanent access to the federal government information they need. GPO plays a critical role in providing valuable government information to the public, and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information.

OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents. Further, the proposed language allows agencies to provide GPO with publications in unusable or inappropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means."

Agencies could comply with this language by providing copies of

1255

documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software). The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files).

Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and individuals depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program. Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program. Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you for your consideration.



"Robert Elshire"
<relshire@uiuc.edu>
12/12/2002 11:52 AM

1256
To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 12, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Robert Elshire
702 S. McCullough Street
Urbana, IL 61801
USA



"Penelope Johnson"
<pjohnson@cwsmarsm
ail.cwmars.org>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1257

12/12/2002 11:38 AM

I am writing about my library's concerns regarding the proposed amendments to the Federal Acquisition Regulations that will allow agencies to procure printing outside of the Government Printing Office.

The Superintendent of Documents provides a strong, centralized, coordinated and managed federal information dissemination and access program through the Federal Depository Library Program. This is crucial to ensuring that citizens have access to information that the federal government has developed. People need not only immediate access, they need long term access which is best accomplished through printed documents.

Libraries and the many people who use libraries depend for this information both electronically and in print for their work and their daily lives. Access to information is necessary in a democracy.

Please do not implement these changes in FAR.

Penelope B. Johnson, Head Librarian
Worcester Public Library
3 Salem Square, Worcester, MA 01608
508-799-1690 FAX 508-799-1652
pjohnson@cwsmars.org

1258



"Saundra Williams"
<swilliam@memphis.edu>

To: Farcase.2002-011@gsa.gov
cc:
Subject: FAR case 2002-11

12/12/2002 11:32 AM

December 11, 2002

Via E-mail: Farcase.2002-011@gsa.gov

Attn: Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street, N.W., Room 4035
Washington, D.C. 20405

RE: FAR case 2002-011

The Office of Management and Budget has proposed amendments to the Federal Acquisition Regulation that will allow agencies to bypass the Government Printing Office (GPO) and procure their own printing. The proposed amendments were published in the Federal Register, November 13, v. 67, no. 219, p. 68913-8, 68914-8. I am writing in opposition to this change.

As the Head of the Government Publications Department at the University of Memphis which is the Regional Depository library for Tennessee, I am extremely concerned about this effort by OMB to bypass the U.S. Code despite the passage of H.J. Res.111, Continuing Resolution, which states, "None of the funds made available under this Act, or any other Act, shall be used by an Executive agency to implement any activity in violation of section 501 of title 44. The amendments to the FAR fail to make clear the plan for providing publications to libraries.

Much of the FAR language is questionable. However, I will address only one issue with which I have a long and involved familiarity. Tennessee publications have no central distribution point such as the Government Printing Office. For some 20 years I have dealt with the haphazard distribution by each Tennessee state agency. The lack of a central clearinghouse for distribution and cataloging is extremely problematic. Agency staff changes cause disruption. The six Tennessee libraries designated as depositories for state publications are burdened with the responsibility of determining if a document has been published, locating the contact person in each agency, and frequently explaining the state depository law to them. All these measures are needed just to obtain the document.

The same problems grow exponentially when you consider nearly 1300 federal depository libraries and countless agency publications. Further complications arise when you consider that the majority of depository libraries are choosing which documents from various agencies they will include in their individual library collections. No single federal agency's procurement office will be able to manage this distribution as efficiently as the Government Printing Office.

This change to the FAR regulations will do great damage to the depository library system, thereby undermining the Nation's belief that an informed citizenry is basic to our democracy.

Respectively submitted,

Saundra Williams
Head, Government Publication
University of Memphis Libraries
126 Ned R. McWherter Library
Memphis, TN 38152

1258



"Diana Cleborne"
 <dianac@norwich.edu
 >

To: farcase.2002-011@gsa.gov
 cc:
 Subject: comments

1259

12/12/2002 11:09 AM

I am writing to provide comments on FAR Case 2002-011, amendments proposed by

the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program.

The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that our citizens have current, comprehensive, and permanent access to the federal government information they need. GPO plays a critical role in providing valuable government information to the public, and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication,

1259

because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents. Further, the proposed language allows agencies to provide GPO with publications in unusable or inappropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means."

Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software). The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files). Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and individuals depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program.

Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program.

Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information

1259

professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLIP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you very much for your consideration, Diana Cleborne

Diana Cleborne
Kreitzberg Library - Acquisitions
Norwich University
23 Harmon Drive
Northfield VT 05663
802.485.2061
dianac@norwich.edu



"Jocelyn Yeo"
<jyeo@linuxmail.org>
12/12/2002 10:59 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1260

December 12, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Jocelyn Yeo
Route 2 Box 59A
Lowell, OH 45744
USA



"Ryan Brown"
<Dyme_atap@hotmail.com>

12/12/2002 10:42 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1261

December 12, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Ryan Brown
13111 Robin Ct.
Chino, CA 91710
USA



"Justin White"
<thetruethugg@neb.rr.com>

12/12/2002 10:19 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1262

December 12, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Justin White
2628 SW 14th
Lincoln, NE 68522
USA



2002-011-1202

United States Department of State

Washington, D.C. 20520

Office of the Procurement Executive
Suite 603, State Annex Number Six

December 12, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW
Room 4035
Attn: Laurie Duarte
Washington, DC 20405

Re: FAR Case 2002-011, *Procurement of Printing and Duplicating Through The Government Printing Office.*

The Department of State offers the following comments on the subject FAR Case. While we support the elimination of the GPO as the mandatory source for printing, we believe that a number of the new procedures imposed are too restrictive. Specifically:

1. **FAR 8.801(b)(2)(i), which requires a synopsis in FedBizOpps for all printing requirements over \$2,500.** It's purported intent is to maximize opportunities for small businesses. Given that all acquisitions between \$2,500 and \$100,000 must be set-aside for small businesses anyway, we fail to see the value in singling out one industry for this special treatment.
2. **FAR 8.801(b)(2)(ii), which requires notice on GSA's "e-buy" system for all orders for printing over \$2,500 under Federal Supply Schedules.** Our comment on this is the same as above. We do not understand why printing is being given such special treatment.
3. **FAR 8.801(b)(2)(iii)(A)(1), which requires that a notice be forwarded to the GPE for publication before an order for printing is placed under an IDIQ or requirements contract.** Our question is this – why? Is this for any dollar value order?
4. **FAR 8.801(b)(2)(iii)(B), which requires that the term of an IDIQ contract for printing be limited to one year.** This is too restrictive.

We are concerned that the requirements imposed above will establish a precedent where any industry that purports to be heavily "small business" will request similar consideration. Printing should be treated no differently than any

2008-011-1263

other service. The fact that we are moving from a mandatory source to allow for contracting with private sources should be enough of a boost to small businesses. Additional special treatment is not necessary and only complicates acquisition of printing services, which should be fairly straightforward.

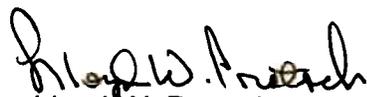
Other comments are as follows:

5. We consider the acquisition of printing to be a commercial item. Therefore, the solicitation does not have to be held for 15 days after publication of the notice, nor would the Government have to allow for a 30-day response time. Is this a correct assessment?

6. **FAR 8.801(e)** states that "whenever feasible", an agency should consult with GPO before issuing a solicitation for a printing acquisition to determine the number of copies that GPO may wish to order. Are there examples of when it would be infeasible to do this? Perhaps a better approach might be for agencies, on some kind of regular basis (monthly, quarterly), to send over a list of publications they have had printed, with the name and address of the printing contractor. If GPO is interested in ordering copies, GPO can contact the contractor directly and purchase the copies it requires. This suggestion applies to 52.208-xx also. GPO doesn't have privity of contract with another agency's contractor, so why are we allowing them to make payments to the contractor? It would be much cleaner to have GPO deal with the contractors directly to get the copies they need.

Questions regarding these comments may be addressed to Gladys Gines, Procurement Analyst, Office of the Procurement Executive. Ms. Gines may be reached by telephone at 703-516-1691, by fax at 703-875-6155, or by e-mail at ginesgg@state.gov

Sincerely,


Lloyd W. Pratsch
Procurement Executive



"Harold Kearsley"
<hkearsle@norwich.ed
u>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1265

12/12/2002 01:57 PM

Dear Sir/Madam,

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program.

The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that our citizens have current, comprehensive, and permanent access to the federal government information they need. GPO plays a critical role in providing valuable government information to the public, and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents. Further, the proposed language allows agencies to provide GPO with publications in unusable or appropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means." Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or

1265

impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software). The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files). Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and individuals depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program. Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program.

Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you very much for your consideration.

Hal Kearsley

--
Harold J. Kearsley, Ph.D.
Professor of Political Science
Director, Master of Arts in Diplomacy
Norwich University. 158 Harmon Drive, Northfield, VT 05663-1035
802-485-2516
hkearsle@norwich.edu
<http://www3.norwich.edu/diplomacy>
<http://www3.norwich.edu/grad>



"Michele Finerty"
 <mfinerty@uop.edu>
 12/12/2002 01:52 PM

To: farcase.2002-011@gsa.gov
 cc: baish@law.georgetown.edu, eplatt@scu.edu, "Michele Finerty"
 <mfinerty@uop.edu>
 Subject: FAR Case 2002-011

1267

On behalf of the Northern California Association of Law Libraries (NOCALL) we write in regard to Memorandum No. M-02-07, dated May 3, 2002, issued from the Office of Management and Budget by Director Mitchell E. Daniels Jr. Director Daniels' Memorandum calls for amendments to the Federal Acquisition Regulation (FAR), which would eliminate the restrictions mandating that Federal agencies use the Government Printing Office (GPO) as their source of printing. The amendments would allow the agencies to procure printing outside of GPO.

NOCALL is concerned that the proposed amendments will endanger the public's ability to locate, use and obtain Federal documents. GPO's Federal Depository Library Program (FDLP) supports public access to U.S. Government publications by disseminating Federal documents to NOCALL member libraries and others across the nation. Any change in operating rules that would diminish the ability of NOCALL member libraries to serve the public by harming the FDLP should be seriously reconsidered. The right of access to Federal documents is an essential principal of our democratic society and both NOCALL and the American Association of Law Libraries believe the Government should provide access to Federal documents on a no-fee basis.

If implemented, the proposed amendments would violate several sections of Title 44 of the United States Code: Section 501 requires that the printing for Federal agency documents be done at the Government Printing Office (GPO); Section 1903 requires that agencies that procure printing outside of GPO pay the cost of printing and binding for copies distributed to FDLP member libraries; and Section 1710 requires that "the head of each executive department, agency and establishment of the Government" supply a copy to the Superintendent of Documents in order for it to be cataloged. NOCALL would like clarification as to how the latter requirement would be fulfilled if the amendments were approved.

Please take into consideration our concerns regarding the proposed amendments to FAR. NOCALL is a chapter of the American Association of Law Libraries (AALL). Our members come from a variety of law libraries and law-related environments, including academic law libraries, county and court libraries (such as the California Supreme Court, the U.S. Court of Appeals), state and federal agency libraries, the California State Law Library, corporate law libraries, law firm libraries and legal information providers.

Ellen J. Platt, NOCALL President
 Santa Clara University
 Heafey Law Library
 Committee
 eplatt@scu.edu

Schaber Law Library

Michele Finerty, Chair
 NOCALL Government
 Relations

McGeorge School of Law
 Gordon D.

mfinerty@uop.edu



"Geoffrey Davison"
<gdavison@norwich.edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1268

12/12/2002 01:14 PM

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO).

I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program.

The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that our citizens have current, comprehensive, and permanent access to the federal government information they need.

GPO plays a critical role in providing valuable government information to the public, and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPC to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

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1268

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Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software).

The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files).

Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

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1268

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Federal law gives GPO primary responsibility for providing public access

to federal government information through the FDLP and the Sales Program. Federal law ensures that federal government information printed through

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public access to federal government information through the FDLP and the

Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to

federal government information.

I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you very much for your consideration.

Professor G. Davison
Division of Mathematics & Sciences
Norwich University
Northfield, VT.

1269



"Gregory Petersen"
<phorbidden@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/12/2002 09:08 AM

December 12, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Gregory Petersen
6720 Crooked Stick Dr
Fort Worth, TX 76132
USA



"Daniel Reimann"
<dreimann@ratio.net>
12/12/2002 08:37 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1270

December 12, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Daniel Reimann
101 BRINY AVE APT 1409
Pompano Beach, FL 33062
USA



"Chadd Horanburg"
<eff@chadd.info>
12/12/2002 02:01 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1271

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Chadd Horanburg
23501 Church St
Oak Park, MI 48237
USA



"Sean Shappell"
<shappells@dickinson.
edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/12/2002 01:58 AM

1272

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Sean Shappell
65 Blue School Rd
Danville, PA 17821
USA

1273



"Chris Ely"
<Chris.Ely@uunode.ne
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/12/2002 01:11 AM

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Chris Ely
4702 Woodfield Circle
Doylestown, PA 18901
USA

1274



"Richard Frey"
<smallfrey60@attbi.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/12/2002 12:44 AM

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Richard Frey
108 W Terrace St
Apt.2-C
Villa Park, IL 60181
USA

1275



"Jacqueline M. Fralley"
<geofral@att.net>
12/12/2002 12:39 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jacqueline M. Fralley
15101 Interlachen Dr Apt 826
Silver Spring, MD 20906
USA

1276



"Dennis Lott"
<dlott72209@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/12/2002 12:15 AM

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Dennis Lott
3 Lendl Loop
Little Rock, AR 72210
USA

1277



"John Crow"
<jcrow@thelema.nu>
12/11/2002 11:13 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 11, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

John Crow
507 Chippewa Way
Acworth, GA 30102
USA

1278

language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means." Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software). The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files).

Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and individuals depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program. Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program. Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you for your consideration.



"Patricia White"
 <pwhite@norwich.edu
 >

To: farcase.2002-011@gsa.gov
 cc:
 Subject: Farcase.2002-011

1279

12/12/2002 09:58 AM

Norwich University is a depository of government documents, the availability of which is vital for an informed student body and future leaders of our country. I am opposed to the OMBs' proposed amendments to 48 CFR, parts 6, 8 and 52. Please ensure the continued availability of government documents to Norwich University students and to Central Vermont.

Thank you,
 Patricia White
 Assistant Professor of English

>
 >
 >COMMENTS:
 >I write to provide comments on FAR Case 2002-011, amendments proposed by
 >
 >the Office of Management and Budget to 48 CFR Parts 6, 8, and 52,
 >"Federal
 >Acquisition Regulation; Procurement of Printing and Duplicating Through
 >the Government Printing Office" (GPO). I strongly urge that these
 >amendments not be adopted, because they would significantly limit public
 >
 >access to federal government information by drastically reducing the
 >number of federal documents distributed to the public through the
 >Federal
 >Depository Library Program (FDLP) and GPO's Sales Program.
 >
 >The distribution of print and microfiche publications through the FDLP
 >and
 >GPO's Sales Program ensures that our citizens have current,
 >comprehensive,
 >and permanent access to the federal government information they need.
 >GPO
 >plays a critical role in providing valuable government information to
 >the public,
 >and indexing and preserving that information for the future.
 >
 >I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and
 >
 >52 not be adopted, for the following reasons:
 >
 >First, the proposed amendments clearly violate current law that is
 >designed to ensure permanent and reliable public access to federal
 >government information. Although OMB cites legal opinions by the
 >Department of Justice to support the abrogation of 44 U.S.C. Section
 >501,
 >the proposed amendments also violate other federal statutes, whose
 >constitutionality the Department of Justice has never questioned,
 >statutes
 >that guarantee public access to federal government information. OMB's
 >proposed amendments violate the federal statute that requires agencies
 >procuring outside of GPO to bear the costs of printing and binding the

1279

>necessary copies for depository libraries (44 U.S.C. Section 1903). In
>addition, the proposed regulation violates the statute that requires
>agencies to supply a copy of all publications to the Superintendent of
>Documents for cataloging purposes (44 U.S.C. Section 1710), because the
>vague proposed wording ("each agency shall ensure a copy of the
>publication is provided...") does not explicitly give the contracting
>agencies the direct responsibility for providing copies to the
>Superintendent of Documents.

>
>Second, OMB's proposed amendments would exacerbate the problem of
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>the agencies from paying for and providing to GPO the legally-required
>number of copies of each publication for distribution to Federal
>Depository Libraries. Also as previously noted, agencies could easily
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>because the vague wording of the proposed amendments ("each agency shall
>
>ensure a copy of the publication is provided...") does not explicitly
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>Agencies could comply with this language by providing copies of
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>to use (for example, corrupted files, raw data files, ASCII text files,
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>files in formats for which GPO does not have the appropriate software).
>The proposed language would likewise permit agencies to provide copies
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>use (for example, a 2,000 page report issued as 300 separate PDF files).
>
>Moreover, the proposed language fails to require agencies to provide GPO
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>or enforcement measures to ensure agency compliance with legal
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>providing publications for the FDLP.

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1279

>Third, the proposed amendments would seriously weaken GPO's Sales
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>to legal information. Under the present system the Superintendent of
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>unofficial, electronic version. The proposed rules do not adequately
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>
>Federal law gives GPO primary responsibility for providing public access
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>to federal government information through the FDLP and the Sales
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>Federal law ensures that federal government information printed through
>GPO is indexed, distributed free of charge to the public in usable and
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>current, effective system, and significantly reduce Americans' access to
>
>federal government information. I therefore strongly urge that OMB's
>proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.
>
>Thank you very much for your consideration.
>
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>
>
>

----- Message from "Lise Albury" <lalbury@norwich.edu> on Thu, 12 Dec 2002 09:48:42 -0500 -----

To: "chandra@microcheck.com" <"
chandra"@microcheck.com>, "Bill
Clements" <clemmey@norwich.edu>,
"Carol Bowen"
<carolbowen@mvalaw.com>,
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<DCoombs@Landmarkcollege.org>, "Debra Rogler" <info@johnnycakeflats.com>, "dopie@bear.com" <dopie@bear.com>, "Eric Ewald" <EEwald@tyreeorg.com>, "EvelynD@wpgate1.ahs.state.vt.us" <EvelynD@wpgate1.ahs.state.vt.us>, "Ewald.William@epamail.epa.gov" <Ewald.William@epamail.epa.gov>, "Hal Kearsley" <hkearsle@norwich.edu>, "Heather Cassidy" <cassidyh@norwich.edu>, "jdbowen@UNCC.edu" <jdbowen@UNCC.edu>, "joyce@nami.org" <joyce@nami.org>, "kaymax@trans-video.net" <kaymax@trans-video.net>, "Lee Peters" <"lpeters"@mcla.edu>, "leslie s ewald" <shawewald@juno.com>, "Louise Murphy" <LouiseM@sbschools.net>, "lparker@norwich.edu" <lparker@norwich.edu>, "Markalbury83@aol.com" <Markalbury83@aol.com>, "Mary & Ed Biancavilla" <fastedd1@optonline.net>, "patdixon@mit.edu" <patdixon@mit.edu>, "Richard Holt" <r.b.holt@worldnet.att.net>, "rvan@painemountain.com" <rvan@painemountain.com>, "smerags@aol.com" <smerags@aol.com>, "Tracy Wilson" <tracy@saltboxpottery.com>, "vhaines@rochester.rr.com" <vhaines@rochester.rr.com>, "vhcullen@aol.com" <vhcullen@aol.com>, "vrlyon@att.net" <vrlyon@att.net>, "wissienc@aol.com" <wissienc@aol.com>, " hlhaines@capecod.net" <"hlhaines"@capecod.net>, "gorgewarrior@hotmail.com" <gorgewarrior@hotmail.com>, "gwhaines@att.net" <gwhaines@att.net>, paula@norwich.edu, rdoyon@norwich.edu, dthalman@norwich.edu, rbrucken@norwich.edu, glord@norwich.edu, westy@norwich.edu,

1279

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sfields@norwich.edu,
gdavison@norwich.edu, gills@norwich.edu,
shannon@norwich.edu,
julieb@norwich.edu, jryan@norwich.edu

1279

Subject: FDLP needs your help - deadline DEC 13

Hi all,
the depository libraries need your help.

Comments are needed by December 13th on OMB's
Proposed Amendments to the FAR That Threaten Public Access and the
Federal Depository Library Program.

BACKGROUND: (from ALA's Washington office)

Director Mitchell E. Daniels Jr. of the Office of Management and Budget
(OMB) issued Memorandum No. M-02-07 entitled "Procurement of Printing
and Duplicating through the Government Printing Office" (GPO) on May 3,
2002. The memorandum calls for amendments to the Federal Acquisition
Regulations (FAR) that will allow agencies to procure their printing
outside of GPO. The proposed amendments were published in the Federal
Register, Vol. 67, No. 219, November 13, 2002, 68914-8. The deadline for
comments is Friday, December 13, 2002.

Accessible government information is an essential principle of a
democratic society and a valuable public good created at taxpayer
expense. ALA believes that government should provide for equitable,
effective, no-fee, efficient and dependable access to and dissemination
of government information in permanent and readily accessible formats.
ALA further believes that a strong, centralized, coordinated and managed

federal information dissemination and access program, such as the
Federal Depository Library Program (FDLP), is necessary to achieve this
important goal.

CURRENT CRISIS:

OMB's efforts to have agencies procure printing outside of GPO are not
new. Congress, demonstrating full support of public access and the FDLP,

successfully thwarted efforts in 1987 and 1994. Recently, Members of
the 107th Congress, on a bicameral and bipartisan basis, included
provisions to prevent agencies from using any appropriated funds to
procure publications outside of GPO in their continuing resolutions that

fund government operations (most recently, in H.J.Res. 124). These
provisions indicate Congress' strong opposition to OMB's proposed
amendments to the FAR.

WHAT YOU CAN DO:

Please submit the comments I've provided below via email on the proposed

FAR to:

<farcase.2002-011@gsa.gov>

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by Friday, December 13th, citing "FAR Case 2002-011" in the subject line.

It's fine to use the comments I've provided - it's more important that you hear from you than that each comment is an original work!!

Please take a minute to do this!!!
thanks,
Lise

COMMENTS:

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program.

The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that our citizens have current, comprehensive, and permanent access to the federal government information they need. GPO plays a critical role in providing valuable government information to the public, and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal

1279

Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents. Further, the proposed language allows agencies to provide GPO with publications in unusable or inappropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means."

Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software). The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files). Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and individuals depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program.

Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program.

1279

Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to

federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLIP and the

Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to

federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you very much for your consideration.



"Katie Hodge"
<khodge@biglizard.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/13/2002 09:18 AM

1280

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Katie Hodge
714 A St, NE #2
Washington, DC 20002
USA



Printing Industries of America, Inc.

Partner of the Graphic Arts Technical Foundation

1281

December 6, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW, Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

The Printing Industries of America is pleased to provide the following comments on the proposed amendments to the Federal Acquisition Regulations (FAR) to implement the policy set forth in the Office of Management and Budget (OMB) memorandum No. M-02-07, Procurement of Printing and Duplicating through the Government Printing Office (GPO) (May 3, 2002). The Printing Industries of America (PIA) is the nation's largest printing and graphic arts trade association with more than 13,000 members.

Before commenting on the specifics in the proposal, PIA wishes to address the legal concerns surrounding this proposal. Current law (Title 44, U. S. Code) and actions taken by Congress in the Continuing Resolution passed in December 2002 would suggest that the OMB proposal, if adopted, would place the private industry contractor in the situation of submitting bids in good faith, accepting awards in good faith, and yet, risking non-payment for contracted work. This potential was identified in a letter by the General Accounting Office indicating that payment of contracts in violation of the continuing resolution would be illegal.

Executive Branch employees likewise are hampered by this legal dilemma. Failure to follow the requirements of Title 44 may subject them to citations from the General Accounting Office and seriously impair their ability to work with members of their appropriations and authorizing committees in Congress.

We believe it is imperative that this conflict be addressed to resolve any uncertainty in the printing contracting community prior to the finalization of regulations. It would be inappropriate to place private companies in this uncertain role.

While we recognize that these legal issues must be resolved, it has been the position of the Printing Industries of America that it cannot aid in such a resolution in these comments. We have, therefore, confined the remainder of our comments to issues that affect the integrity and efficiency of the federal print procurement system.

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Also, we have included some overview comments about the federal printing and print procurement program. We have made these suggestions for many years in an effort to assist the government with more efficient buying of information products.

1. The federal government does not have an information planning process nor does it have a printing and publishing plan. This failure to plan has created waste and abuse in the system. For example, federal agencies should be required as part of the budget planning process to submit a printing, information and publishing plan. This plan could be reviewed by the Chief Information Officer of each agency to determine the validity of the plan and whether the plan meets the agency's mission. With the approved plan, the agency could coordinate such plans with the Government Printing Office, develop requests for proposals from private companies, or consider alternative information options. We strongly recommend the implementation of an information planning process.
2. The Executive Branch should conduct an audit of its printing, copying, digital printing and duplicating capacity and commitments to assure that the taxpayer is being served. Printing is the nation's most competitive manufacturing industry. Printing is the largest industry in the United States in terms of numbers of establishments. This means that the federal government can always be assured of a competitive marketplace for printing. For the federal government to purchase equipment is to provide competitive services offered by private industry in every community in America and often invest in technology that can never be fully utilized.
3. In the "Supplementary Information" A. Background, 1. Overview Second bullet, the OMB states, "Providing agencies express authorization to address printing needs by either contracting with a private source or by using the GPO when the GPO offers the best value." This supplementary information and the specifics outlined in 8.801 Policy, subsection (c) are confusing. The implication in this proposal is that a federal agency, after January 1, 2004 would not be able to use the GPO unless such service was part of a competition. The majority of the printing work, which is processed by GPO, is contracted to the private sector. This section would require the agency to ask GPO to seek bids from the private sector while also requiring the agency to seek bids. The section would only apply in those rare instances when the GPO had predetermined that it would produce the printing job in house at the GPO and not contract to the private sector. We believe it would be more beneficial to the government for the agency to ask GPO to either handle the procurement or not. Conducting competing or "dueling" procurements would be unfair to the private companies that must spend time and resources on bidding.

We recommend that agencies continue to be given the latitude and authority to use the Government Printing Office for printing and printing procurement needs based on the unique requirements of the agency. Our proposal was also reflected in the public comments that have been made by OMB officials that the GPO could continue to be used if the agency wished to use the procurement services of GPO.

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4. In the section “Supplementary Information” A. Background, 1. Overview Third bullet, OMB states “substantially limiting the circumstances where agencies may rely on in-house or other Executive Branch printing operations.” These comments are reflected in the proposed regulations under 8.801 Policy (a) (3). While we welcome this addition to the regulations, it is a reality that such a competition can always be conducted in a manner that will favor the in-house operation. We urge that OMB adopt a broader policy which states that in-house capacity should be limited to self service copying and duplicating unless issues of national security indicate a need for additional facilities.

Also related to this section is the need for a clear definition of printing. Printing in this sense should include printing, copying, duplicating, and digital printing. There is a regrettable history in the federal government of using limited definitions of printing to allow agencies to avoid the spirit of regulations.

5. In the section “Supplementary Information” A. Background, 1. Overview Fourth bullet, OMB proposes to lower the small purchase threshold to \$2500 to reflect the typical size of printing contracts. We support this change; however, 80 percent of GPO contracts are under \$2500. While we do not propose the creation of a competitive bid program for these very small contracts, we would ask that OMB encourage agencies to implement procurement efficiency plans to buy such jobs from simplified purchase agreements, blanket purchase agreements, multiple award schedules or by combining contracts to reduce procurement costs. We would distinguish this type of procurement from “bundling” in that these contracts would typically be awarded to small, regional printing companies due to the dollar value of the job and the need for quick turn-around.

Also related to this section is a need to address the time required for procurement opportunities to be posted. FAR and FedBizOps provides for a twelve day posting requirement. Printing purchasers in the federal government are accustomed to turn-around times of less than 72 hours. We believe these shorter “posting” requirements times should be included in the new regulations.

6. In the section “Supplementary Information” A. Background, 1. Overview Fifth bullet, OMB addresses the need for “best value” contracts. This is a desirable change for both agencies and printers seeking to do business with the federal government. We believe this change, particularly if combined with the planning process we proposed, will enable the federal government to take advantage of abilities in the modern U. S. printing industry which are currently not being fully utilized. Best value contracts should include opportunities for printers to discuss with agency customers the most effective methods of completing printing jobs and delivering those jobs to the desired audience. Modern printing companies are skilled in pre-press or pre-flighting of work, printing and distribution/fulfillment. Use of modern technologies can significantly reduce agency burden, reduce procurement costs and improve timeliness and quality.

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In conclusion we want to acknowledge the work done by the staff of OMB to develop these proposals. There is a need for general reform and better coordination in the production, procurement and distribution of federal government information. We are hopeful that this proposal will advance that process.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Benjamin Y. Cooper', with a long, sweeping horizontal stroke extending to the right.

Benjamin Y. Cooper
Executive Vice President

1282

**FAR Secretariat
General Services Administration
Comments on FAR case 2002-011
Submitted via the Internet to: farcase.2002-011@gsa.gov
December 13, 2002**

RE: FAR CASE 2002-011

Pittsburg State University is a comprehensive regional University in the southeast portion of the State of Kansas. The University is a selective depository in the Federal Depository Library Program and serves a large and disparate geographical region with government information services.

The proposed rule to implement OMB Memorandum No. M-02-07 as published in the *Federal Register* on November 13, 2002 is of grave concern to us as we strive to provide information resources to the area and our students and faculty. The users of our government resources are varied including small businessmen, health practitioners, researchers, students, and the general public. If the proposed rule is implemented, it will fragment an adequately functioning structure designed to inform the public and protect our democratic way of life. It will do nothing to improve the current system.

Of particular concern is the proposal allowing executive agencies to bypass the Government Printing Office (GPO)'s printing procurement system. The result will be that access to Federal information will become even harder for the general public and other non-governmental users to obtain. Without the centralized procurement provided by GPO, the problem of "fugitive" documents and gaps in the Depository Library collections will increase. Nothing in the proposal encourages long-term permanent access nor compliance by agencies with current depository requirements.

The proposal is most likely illegal, as it counsels executive agencies to ignore 44 U.S.C. §501, a section that the Justice Department deems to be unconstitutional. More troubling is that noncompliance with other sections of Title 44 that have not been challenged, would also be allowed.

Despite rhetoric in the proposal to the contrary, the problem of fugitive documents will increase as there is no form of enforcement in the OMB Memorandum. Agencies are unlikely to adhere to "guidance" from OMB that they comply with depository library requirements.

The fiscal responsibility for providing information to the public and for archival purposes is shifted from the executive agencies to GPO which is not funded to procure the necessary materials for any of the by-law programs. Congress is unlikely to agree to pour a lot of money into the Legislative budget to continue what is now an executive branch statutory responsibility.

1282

The motivation for the changes described in your notice include: 1) inducing competition; 2) saving taxpayer money; 3) promoting small business opportunity; and 4) proposing "specific new actions" that will "improve dramatically the depository library system by ensuring that all government publications are in fact made available to the nation's depository libraries." In actuality, this proposal would do none of these things any better than the current system and the matter of "saving taxpayer money" and improving public access would result in a negative change. Almost all of the current executive agency printing is currently contracted out, in many cases to small businesses. If, in fact, the percentage of information products included in the depository program were increased, the massive inefficiency created by the proposal would most certainly cost more money. Most assuredly, however, without any enforcement mechanism nor the routine process of current printing procurement managed by GPO, the public's access to government information that they have already paid for will be greatly diminished.

This proposal is contrary to current law, against expressed Congressional intent, and antithetical to the open and ready access to government information. It should be rejected. Thank you for the opportunity to respond to this proposal.

Robert A. Walter
Dean of Learning Resources
Pittsburg State University
Pittsburg, Kansas 66762

e-mail: bwalter@pittstate.edu



"Alford, Thomas"
<TALFORD@QueensLibrary.org>

12/13/2002 08:43 AM

To: "'farcase.2002-011@gsa.gov'" <farcase.2002-011@gsa.gov>
cc: "Cruz, Frances M." <FCruz@QueensLibrary.org>
Subject: FAR Case 2002-011rev

1283

If you need more information, please contact Thomas Alford at this e-mail address or telephone 718-990-8677.

~~NOTE: The email indicates that the response should be sent electronically to gsa.gov and to alwash.org. To whom would you like to address this document in letter format?~~

December 9, 2002

Mitchell E. Daniels, Jr. Director
Office of Management and Budget

Dear Mr. Daniels:

On behalf of the Queens Borough Public Library (QBPL), I am pleased to provide comments regarding the Office of Management and Budget (OMB) issued Memorandum No. M-02-07 entitled "Procurement of Printing and Duplicating through the Government Printing Office" dated May 3, 2002. The memorandum calls for amendments to the Federal Acquisition Regulations (FAR) that will allow agencies to procure their printing outside of GPO. The proposed amendments were published in the Federal Register, Vol.67, No. 219, November 13, 2002, 68914-8.

The QBPL is the fifth largest public library system in the U.S. and has the highest circulation of any public library system in the country. The library has a strong interest in federal information policy and in our ability to meet the informational, educational, cultural and recreational needs and interests of its diverse and changing population.

Our librarians, working with and for our customers, know first-hand, the importance and impact that government information has on the health and lives of all customers, on the economic well being of our Nation and on the preservation of our democracy. The Queens Library's Central Library is one of more than 1300 Federal Depository Libraries across the country, -which provides access to and assistance to the American public in finding and sorting through this tremendous amount of critically important Federal government information on all subjects and in many formats.

We will focus our comments on the following key points:

1. The Federal Depository Library Program (FDLP) as organized under

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the statutory authority of Title 44 of the United States Code safeguards one of our nation's strongest traditions: the public's right to know. The FDLP identifies, catalogs, and ensures permanent public access to Government publications, Federal depository libraries and the FDLP Electronic Collection. The proposed change ~~doesn't safeguard~~ jeopardizes that ~~(???) above~~ authority.

2. Depository libraries provide free local access to publications of public interest and educational value from all three branches of the Federal government. The proposed change prevents such access ~~doesn't provide a means for us to know and to have access to all of the documents~~ in a timely manner. In effect, ~~Thus,~~ our customers, the American public, would be impeded from researching what should be freely accessible government ~~would not have access to all of the documents~~.

3. Any fees charged by the printing agency would have to be paid by Queens Library. Our understanding is that Congress is in the process of including provisions to prevent GPO from paying for materials printed by outside agencies. Queens Library is being forced to make buying decisions not based on the needs of customers, but on available funds to pay for materials - thereby limiting the very nature of our open government

4. It is not clear that all agencies will use the same printer. There could be problems with standardization of the format of the information. As a result, the basic authority of government documents would come into question. The American public would be denied the certainty that they are receiving accurate, full and complete government information.

Based on the above concerns, we recommend that changes be made to proposed FAR Case 2002-011 policies and guidelines.

Sincerely,

Gary E. Strong
Library Director

1284



"Earl Bley"
<Earl.Bley@mindspring.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/13/2002 08:31 AM

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Earl Bley
1880A Carnation Ct
Aurora, IL 60506
USA

1285



"Joshua Collom"
<josh.collom@delphi-
ss.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 08:04 AM

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Joshua Collom
416 W Dallas Ave
Madison Heights, MI 48071
USA

1286



"Peter Vachuska"
<pvachuska@nconnect.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 06:21 AM

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Peter Vachuska
440 North St
West Bend, WI 53090
USA

1287



"Brody Hurst"
<kagenin@cyberspace.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/13/2002 05:24 AM

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Brody Hurst
810 Forest Glade Cir
Grass Valley, CA 95945
USA

1288



"Bryan Johns"
<bjohns@greendragon
web.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/12/2002 09:57 PM

December 12, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Bryan Johns
4145 Grass Farm Road
Wetumpka, AL 36092
USA

1289



"John Rulnick"
<eff@rulnick.com>

12/12/2002 09:40 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 12, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management

and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

John Rulnick
14 Buffum Ln
Charlton, MA 01507
USA



"Jill Vassilakos-Long"
<jvlong@csusb.edu>
12/12/2002 09:12 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1290

Attn. Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street N.W., Room 4035
Washington, D.C. 20405

RE: FAR Case 2002-011

I'm writing to oppose the proposed amendments to the Federal Acquisition Regulation (FAR), implementing policy set forth in Office of Management and Budget (OMB) Memorandum No. M-02-07, Procurement of Printing and Duplicating Through the Government Printing Office (May 3, 2002).

The proposal is illegal (it violates Title 44). On that basis alone it should be dismissed immediately.

The proposal also SHOULD be illegal. The provisions regarding the Government Printing Office in Title 44 are essential for providing public access to information on the actions of our government.

The statement in the proposal that costs can be saved by decentralization flies in the face of common sense. Why do companies merge? Partly to save costs. Why are essential national security services being centralized under the Department of Homeland Security? Partly to increase efficiency. Decentralization decreases efficiency.

Even worse than the inefficiency that would lead to INCREASED, not DECREASED costs, is the inefficiency that would lead to "lost" information. This experiment has already been conducted on a state level. Look at California documents. California follows the same decentralized plan that is proposed for Federal documents. Our estimate is that less than 20% of the state's documents end up being preserved in libraries for citizen access. We've had agencies assume that the public access mandate meant that they should disseminate documents through drugstores; then six months later, when a constituent wanted a copy, no-one at the agency could produce one. I've had agencies tell me that a document must have been on the computer of an employee who left (and the computer's hard-drive had been cleaned out). I've had citizens show me photocopies that included the agency as a publisher and had the agency tell me that the document had never existed, that it must be a figment of the citizen's imagination. DECENTRALIZATION DOES NOT WORK. I just don't know how to say it any more plainly. IT DOES NOT WORK. If you decentralize government document printing, you are consigning most government documents to oblivion. You are destroying part of the history of our country. Please stand against this. Please work to keep

Title 44 intact.

Sincerely,
Jill Vassilakos-Long
jvlong@csusb.edu
Government Documents Librarian



"David McFadden"
<dmcfadden@swlaw.edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR case 2002-011

1291

12/12/2002 07:31 PM

12 December 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW
Room 4035
ATTN: Laurie Duarte
Washington, D.C. 20405

RE: FAR case 2002-011

Greetings:

I am a law librarian at a federal depository library and am deeply concerned about the proposed amendments to implement the policy set forth in Office of Management and Budget (OMB) Memorandum No. M-02-07.

Although I have doubts about the legality and efficiency of such a change in general in light of 42 U.S.C. sec. 501, my specific concern is the impact that this will have on the availability of government documents to the public. I am afraid that the proposed decentralized approach which is without adequate safeguards will exasperate the fugitive documents problem and the availability of government information in general.

Proposed 48 C.F.R. 8.801 (d) & (e) violates 44 U.S.C. sec. 1903 regarding depository copies of government documents. 44 U.S.C. sec 1903 states, "[t]he cost of printing and binding those publications distributed to depository libraries obtained elsewhere than from the Government Printing Office, shall be borne by components of the Government responsible for their issuance." The proposal shifts the burden for depository copies from the agency to the G.P.O. by requiring that only "a copy of the publication is provided to the GPO's Superintendent of Documents for distribution to the Federal Depository Libraries." Although I oppose the proposal, if it is implemented it should be in compliance with current law. At a minimum, 48 C.F.R. 8.801 (d) & (e) should be amended to reflect this. Also, frankly this shift allows for a shell game of sorts so that agencies can claim reduced costs. The agency can claim a much reduced expense since G.P.O., under this proposed rule, would be sharing the expense of printing an agency's publications.

The issue of fugitive documents is mentioned in the Supplementary Information but should be given higher status than merely a proposed guidance that includes a reporting requirement. What are the consequences of a violation of the guidance? Who enforces this? Why aren't these requirements required to be in the contract with the printer? This all could easily be placed in the regulation. In California when the California Code of Regulations was privatized in the early 1990's, the private publisher was left in the dark by the Office of Administrative Law, which was negotiating the contract, about the state's obligations to provide depository copies. Unnecessary litigation and a renegotiation of the contract was required to solve the problem. Once again the current law and obligations of agencies should be fully reflected in the regulation.

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One way to avoid problems with fugitive documents is to provide the publications to the GPO for cataloging purposes. The existence and information is then widely distributed. Quite simply, if a document is known, then it is less likely to be a fugitive. 42 U.S.C. sec. 1710 addresses this issue but this seems to be also caught in the shift of obligations in 8.801 (d) & (e).

For these and other reasons, I oppose the proposed regulation. At best, I would prefer the GPO to continue its efficient and effective role of coordinator of government printing along with its role in the central coordination of the Federal Depository Library Program and other efforts to disseminate government information both electronically and in print to the American People. If this is not possible, I would hope that the laws dealing with the distribution of government information be fully reflected in the regulation as I have outlined above.

Sincerely,

David McFadden
Senior Reference Librarian

--

```

*****
David McFadden                Southwestern University
Senior Reference Librarian    School of Law Library
(213) 738-6726 - voice       675 S. Westmoreland Avenue
(213) 738-5792 - fax        Los Angeles, California
email - dmcfadden@swlaw.edu  90005-3992
*****

```



"Greg Haines"
<gorgewarrior@hotmail.com>

To: farcase.2002-011@gsa.gov
cc: lalbury@norwich.edu
Subject: FAR Case 2002-011

1292

12/12/2002 07:22 PM

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program.

The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that our citizens have current, comprehensive, and permanent access to the federal government information they need. GPO plays a critical role in providing valuable government information to the public, and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication,

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because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents. Further, the proposed language allows agencies to provide GPO with publications in unusable or inappropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means."

Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software). The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files). Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and individuals depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program.

Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program.

Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information

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professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you very much for your consideration.
Greg Haines

MSN 8 with e-mail virus protection service: 2 months FREE*
<http://join.msn.com/?page=features/virus>



pkaczma@detroit.lib.m
i.us

12/12/2002 06:56 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1293

To Whom it May Concern:

I am writing regarding FAR Case 2002-011.

The proposed regulation will not provide a tax savings for citizens but rather it will cause an additional tax burden. Much of the printing of official information of our country is already contracted to the private sector, and mainly small business, which bids on the contracts. Dispersing this activity will increase the use of human resources both in the executive agencies which will create bidding and compliance procedures they never needed before and in the small businesses which will need to learn new bidding procedures and contract vagaries that exist in different branches of government. I teach small business people on a regular basis to use FedBizOpps and am familiar with the lack of uniformity of procedures that can happen in our large government. Increasing the workload for government staff and for print shops will result in increased costs overall.

Another cost will arise when people need to use the information produced by their government. Most depository libraries do not select the total output available through the depository library program, but rather they select a portion that is needed in their local community. In doing so the local institution often weighs the cost of overhead that will be incurred locally. The proposed regulation may call for one copy to arrive at the Government Printing Office, but there are no controls regarding intent to publish, which is how publications are generally identified for depository potential. Nor are there requirements for copies to arrive in a timely manner. This means that local communities will either pay for the time and expertise it takes to identify, locate, acquire, and process information products, or the community will not have it at all. In our democracy we assume people have the right to know of the workings of the government. The proposed regulation will place a heavy burden on communities across the country, and they will all be duplicating efforts to replace a system which is working predictably and which responds to local needs. The existing system probably can work more efficiently, but it works quite well now. Bypassing would not be a benefit.

My final point is that the proposed regulation does not address the responsibility of the government to insure that it provide official information to its citizens. It talks about providing copies to GPO for distribution but nowhere does it safeguard the authenticity of any copy so that people in all the states and territories are using one official version.

Thank you,
Paula Kaczmarek

Paula Kaczmarek
Manager, Government Documents
Detroit Public Library
5201 Woodward Ave.
Detroit MI 48202-4007

US Regional Depository #0275
313 833-1025 (v)
313 833-0156 (f)

1294



"Axtmann, Margaret
M."
<MMAXTMANN@stthomas.edu>

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc: "Axtmann, Margaret M." <MMAXTMANN@stthomas.edu>
Subject: FAR Case 2002-011

12/12/2002 05:21 PM

Ref: FAR Case 2002-011

I am writing to express strong opposition to the proposed amendments to the Federal Acquisition Regulation (FAR) that will allow federal agencies to procure their own printing outside of the Government Printing Office. Such a change would have a negative impact on the availability of government information to the citizens.

The creation of government information is a valuable public service generated at taxpayer expense, and access to government information is an essential principle of a democratic society. A strong, centralized program to produce and disseminate government information is necessary to ensure public access. The Government Printing Office, the Superintendent of Documents, and the Federal Depository Library Program (FDLP) are effective components of a coordinated program of publication and distribution of government information.

The proposed amendments are a clear violation of 44 U.S.C. §501, which allows only a few exceptions to the mandate that all government printing be done at the Government Printing Office. In addition to 44 U.S.C. §501, the proposed FAR amendments violate other Title 44 provisions:

- §1903 requires agencies that procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The proposed change that the Superintendent of Documents would bear these costs contradicts current law.

- §1710 requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes. The proposed changes do not provide a comprehensive plan for achieving this.

The Superintendent of Documents, working with its professional library personnel, manages a program of federal information dissemination and access through the Federal Depository Library Program. A strong system of coordination, including an effective and transparent system to bring government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The proposed FAR change does not create such a system, choosing instead to leave a void in the place of the current effective structure.

The proposed amendments also do not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the Superintendent of Documents. There will be more fugitive publications, not fewer, without clearly defined agency responsibilities and a means of enforcing those responsibilities. This change will have a negative impact on the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

Similarly, libraries that are not part of the Federal Depository Library Program, will find it more difficult to identify and acquire government publications that are not distributed from a central source and sold through

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an effective sales program. Furthermore, law libraries especially depend on the GPO Sales Program to purchase print versions of federal primary legal materials that are provided to depository libraries only in an unofficial electronic version. The proposed amendments to the FAR do not adequately provide for a continued cost effective sales program.

Thank you for the opportunity to comment on these proposals. I strongly urge the FAR Council to withdraw this proposal and to keep in place the current system of procurement and printing through the Government Printing Office.

Margaret Maes Axtmann
Chair, Government Relations Committee
Minnesota Association of Law Libraries

Margaret Maes Axtmann
Associate Director for Information Resources
University of St. Thomas Law Library
1000 LaSalle Avenue, TMH LL27
Minneapolis, MN 55403-2005
Voice: 651-962-4868
Fax: 651-962-4910
mailto:mmaxtmann@stthomas.edu



"Lynne Reasoner"
<reasoner@citrus.ucr.edu>

12/12/2002 06:02 PM

To: Farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-11

1295

Attn. Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street N.W., Room 4035
Washington, D.C. 20405

RE: FAR Case 2002-011

I am writing to strongly opposed the adoption of the amendments to the Federal Acquisition

Regulation (48 CFR parts,6, 8, and 52) proposed by the Office of Management and Budget.

If adopted, the proposed amendments would result in the public having less significantly less

access to federal government publications and information. Publications will not be distributed

through the federal depository library program, and they will be not be available for sale

through a central agency.

The proposed amendments violate current law guaranteeing public access to federal government

information. Current law requires agencies to print through the Government Printing Office or to

provide the Superintendent of Documents with sufficient copies of publications for distribution to

federal depository libraries. (44 U.S.C. section 1903). The proposed amendments would have

agencies transmitting electronic files to the Superintendent of Documents and the GPO purchasing

copies of publications for depository libraries. This obviously does not meet the requirements of

Title 44, and does it provide for government publications to be accessible to taxpayers throughout

the country (federal depositories are located in almost all Congressional

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districts). There are no enforcement provisions for transmitting files and no requirement that the electronic files be usable.

There is no acknowledgement of the fiscal responsibility of the agency to provide (fund) the copies deposited in federal depository libraries.

California state government agencies are not required to print through a central printing office.

This is not a successful model for the federal government to copy. Copies of state agency publications are not printed in sufficient quantities; citizens cannot figure out where to purchase copies of publications; most publications are not routinely sent to depository libraries; and when an administration changes electronic publications disappear. Distributed printing and no-enforcement dissemination to depository libraries does NOT work: government information is not disseminated to the public.

The Government Printing Office has in the past ten years become a most efficient and cost-effective publisher and printer. Most of its printing of executive branch publications is contracted out to private publishers. Under the proposed amendments, individual agencies will end up spending more for less when they contract for printing outside the Government Printing Office. Small printing establishments may receive fewer federal government printing jobs. Individuals and companies will not know where to purchase federal government publications and information products. Depository libraries will not receive publications to that ensure citizens, students, scholars, businesses, and lawyers have lasting access to the government reports, statistics, laws, and other information paid for with their tax dollars.

Sincerely,
Lynne Reasoner
Citizen and
Government publications librarian

University of California, Riverside – Library
P.O. Box 5900
Riverside , California 92517-5900
909-787-3714

1296



"Catherine Lemann"
<CLEMANN@lasc.org>

To: Farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1296

12/12/2002 05:33 PM

As a law librarian in a depository library, I am strongly opposed to OMB's proposed amendments to the FAR that would allow agencies to use appropriated funds to procure publications outside of GPO.

As a public services librarian, I frequently look for government documents to answer inquiries. The ability to easily locate government documents is essential. These are documents created by federal entities and agencies.

I fear that should agencies be allowed to procure their printing outside of GPO, that this access will be adversely affected. It is an essential element of our democratic process that individuals be informed of the actions of their elected and appointed officials. There is already a problem with "fugitive documents" which are unavailable. I am afraid that the proposed regulations would result in more fugitive publications, rather than fewer.

There is a need for a strong system of coordination to bring Government publications into the Federal Depository Library Program. The format of the information is not as important as permanent public access to it, either in print or electronically. This change is fatally flawed in that it does not ensure such a system.

I urge you to continue to provide effective access to government publications at a reasonable cost.

Sincerely,
Catherine Lemann

Catherine Lemann
Associate Director
Law Library of Louisiana
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clemann@lasc.org

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"Michele McKnelly"
<michele.mcknelly@u
wrf.edu>

To: Farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

129M

12/12/2002 05:31 PM

Attn. Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street N.W., Room 4035
Washington, D.C. 20405

I'm writing to oppose the proposed amendments to the Federal Acquisition Regulation (FAR), implementing policy set forth in Office of Management and Budget (OMB) Memorandum No. M-02-07, Procurement of Printing and Duplicating Through the Government Printing Office (May 3, 2002).

The proposed FAR change is problematic in two respects: first, it violates current law; and second, it will make the problem of fugitive documents, which it purports to help much worse.

The Office of Management and Budget dislikes the provisions of Title 44. Yet has not lack the authority to change it, this proposal is a clear violgation of 44 USC §501, §1903,

This proposed change in regulation has drawn strong opposition from Congress, on a bipartisan basis. As written, without specific detail as to how agencies would comply with providing publications to the Superintendent of Documents for cataloging and distribution of print materials or dissemination of electronic government information, it fails to adequately support the needs of the depository community or the public. While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR amendment are so vague that the result will be more fugitive publications, not fewer. Moreover, as we have noted, the lack of any proposed oversight and any enforcement mechanism obviates the stated intent of the amendment: "to improve dramatically the depository library system by ensuring that all Government publications are in fact made available to the nation's depository libraries."

While the proposed change may seem reasonable on its face to those unfamiliar with the workings of the Federal Depository Library Program (FDLP), it lacks the necessary components of coordination and centralization that are as required in the electronic environment as they are in the print world. Today, the SuDocs, working with its professional library personnel, and partner FDLPS provides a strong, centralized, coordinated and managed Federal information dissemination and access program through the FDLP.

Michele T. McKnelly
Government Documents
Chalmer Davee Library
University of Wisconsin - River Falls
River Fallls WI 54022
voice: 715.425.4482
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""Christopher J.J.
Thiry""
<cthiry@mines.edu>

12/12/2002 05:08 PM

To: farcase.2002-011@gsa.gov
cc: cthiry@mines.edu
Subject: FAR Case 2002-011

1298

Director Mitchell E. Daniels,

I am writing in regards to Memorandum No. M-02-07 entitled "Procurement of Printing and Duplicating through the Government Printing Office" (GPO) on May 3, 2002. The memorandum calls for amendments to the Federal Acquisition Regulation (FAR) that will allow agencies to procure their own printing outside of GPO. The proposed amendments were published in the Federal Register, Vol.67, No. 219, November 13, 2002, 68914-8. I strongly urge you NOT to adapt the proposed amendment.

I am the Map Librarian at the Colorado School of Mines. Our Library participates in the Federal Depository Library Program (FDLP), and houses over 195,000 maps. A majority of the items in our collection have been received via the FDLP. These include maps showing topography, geology, and mineral resources. Our patrons represent a diverse population; this includes students, professors, scientists, members of the petroleum and earth science industries, and members of the general public. Our Map Room is heavily used and valued by our patrons.

I believe that FAR Case 2002-011 will threaten our collection and hence our patrons' knowledge base, by weakening the FDLP. As you are very aware, Libraries throughout the country receive, free of charge, materials printed by the Government Printing Office (GPO). In return, the libraries agree to house and provide free access to that information. This system is over 100 years old and is a marvelous way for the federal government to decimate information. An informed democracy is a strong democracy. Accessible government information is an essential principle of a democratic society and a valuable public good created at taxpayer expense.

The new amendments will effectual destroy the FDLP. If agencies are allowed to bypass GPO, information will NOT to libraries. GPO currently acts a central distribution agency for government information. Without a distribution agent or system, the valuable work done by federal works will go unknown. The public will be robbed of access to information and research. The information, paid for by the US taxpayer, will be lost.

Further more, the proposed amendments are a clear violation of 44 U.S.C. §501 since they authorize agencies to procure their printing outside of GPO.

Please do NOT adapt amendments proposed in Memorandum No. M-02-07 entitled "Procurement of Printing and Duplicating through the Government Printing Office" (GPO).

Thank you. Please feel free to contact me regarding this issue.

--

Christopher J.J. Thiry
Map Librarian



"Deborah Mongeau"
<dmongeau@uri.edu>
12/12/2002 05:14 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: Comment concering FAR case 2002-011

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW
Room 4035
ATTN: Laurie Duarte

1299

Comment Concerning FAR case 2002-011

I wish to comment that implementation of this rule is unnecessary and is based on erroneous assumptions.

--First, this proposed rule assumes that the GPO as the government printer costs too much and is monopolistic. In reality, the GPO has contracted out many of its printing jobs and has used a competitive bidding process. Many contracts have been awarded to small printers. As a matter of fact, it is my understanding that the majority of non-classified and non-time sensitive printing is handled by outside printers, those same small businesses that this rule is supposed to support.

--Second, this proposed rule assumes that agencies can seek and secure more competitive printing contracts. I find it hard to believe that a typical government agency whose function is not printing and publishing would be able to muster the expertise and resources to seek out and examine and negotiate a more cost efficient contract than GPO, an agency whose sole function, expertise and resources is devoted to printing publishing and distribution.

--Third, some agencies have in the past contracted out their printing independently in certain cases and, in the experience of the library community, with mixed results. These "independent printings" are usually the source of the infamous "fugitive documents" documents which contain useful and valuable information but seem to vanish off the face of the earth because they weren't given wide distribution. Even though agencies now are required by law (44 U.S.C. 1902, 1903) to transmit publications to GPO for distribution to the Federal Depository Library Program, the track record is still not good. However, I don't think that a rule from the OMB would hold any more sway over an agency than the U.S. Code does now.

In another scenario, the information gathered by an agency at taxpayer expense is turned over to a private sector publisher who then charges a price to access what by all rights is free information. Only after many protests by the library community does this information get put back into the Federal Depository Library Program to ensure free access.

--Fourth, and to me the most important, letting agencies decide who will publish what will mean that government information will no longer be easily accessible to the taxpayer. What was easily obtained by GPO and quickly distributed to libraries through the Federal Depository Library Program, will no longer be available without long and tedious searches by many librarians

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knocking on many doors and pestering numerous agency personnel. I can speak from experience here by my experience in obtaining Rhode Island state publications. Like the federal government, state governments produce information that is necessary for the taxpayers to be able to easily consult. However unlike the federal government, many states do not have centralized printing or distribution systems for their publications and the result is chaos for the taxpayer trying to find even simple information and for the librarians who are trying to help them. Before implementing this rule it might be a good idea to examine those states which have centralized printing with those that don't and compare the differences. I think that you will see that those states with centralized printing and distribution are able to get documents quickly printed and widely distributed at a lower cost and with higher taxpayer satisfaction concerning the openness of their government than those that don't have centralized printing.

--Finally, having federal printing centralized did not happen out of a vacuum. The GPO was created in the mid nineteenth century in response to the disastrous shortcomings of the existing system where government printing was done by a patchwork system of private publishers printing documents erratically for numerous agencies and for elected officials acting on their own. These contracts were usually awarded on the basis of political patronage and publications might or might not actually get printed. If they did get printed, they might or might not get distributed to the taxpayers or libraries. Many times they ended up in politician's offices as free "giveaways" to visitors or campaign hacks. They were the nineteenth century equivalent of the bumper sticker or the refrigerator magnet. As for government information actually getting out to the taxpayer who could use the information to better his or her life, or to keep the government accountable, well, it was a hit or miss proposition to say the least.

I find it ironic that in the 21st century, there is anyone advocating a return to a system that has so many potential pitfalls as this one that was replaced almost 150 years ago and for good reason.

Deborah Mongeau
Government Publications Librarian
University of Rhode Island Library
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"Charles Dyer"
<cdyer@sdcp11.org>
12/12/2002 03:11 PM

1300
To: farcase.2002-011@gsa.gov
cc: "Amy Hale Janeke" <ahale@sdcp11.org>, "Joan Allen-Hart"
<jallen-hart@sdcp11.org>, "Mary Alice Baish"
<baish@law.georgetown.edu>
Subject: FAR Case 2002-011

Greetings.

I am the director of the San Diego County Public Law Library, an institution that has provided public access to the law since 1891. I am writing because we are concerned about the Office of Management and Budget's (OMB) Proposed Amendments to the Federal Acquisition Regulations that would allow agencies to procure their own printing outside of the U.S. Government Printing Office (GPO). The proposed amendments were published in the Federal Register, Vol. 67, No. 219, November 13, 2002, 68914-8. While proposed as a cost-saving device by enabling outsourcing, it is anything but that. Individual agencies cannot have the same market power to achieve discounts that the GPO has achieved for years and years. Their increased costs will be made up with increased charges and more restricted distribution.

The government should provide for equitable, effective, no-fee, efficient and dependable access to and dissemination of government information in permanent and readily accessible formats. This can only be accomplished through a strong, centralized, coordinated and managed Federal information dissemination and access program, such as the Federal Depository Library Program (FDLP). Allowing a decentralization of government publications will result in disorganized chaos for researchers, lawmakers, and the general public. The proposed changes to the FAR will also result in more fugitive publications (i.e. government publications that are not cataloged and accessible).

Additionally, the proposed amendments are a clear violation of 44 U.S.C. §501 since they authorize agencies to procure their printing outside of government printing office (GPO).

Finally, these amendments would impair law libraries' accessibility to low cost Federal primary materials that are essential to conducting legal research. It is imperative that library patrons and citizens have timely, comprehensive and permanent access to Federal government information in print and electronic formats.

This amendment threatens public access to government information which has been created at taxpayer expense. It will certainly restrict access to government information.. This would violate an essential principle of a democratic society. It is our sincere hope that these poorly drafted, vague amendments are not passed.

Thank you.

Charles Dyer

--

Charles R. Dyer
Director of Libraries
San Diego County Public Law Library
1105 Front St., San Diego, CA 92101-3904
619.531.3904
cdyer@sdcp11.org
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"Lisa S. Nickum"
<lnickum@mines.edu>

To: farcase.2002-011@gsa.gov
cc: lnickum@mines.edu
Subject: FAR Case 2002-011

12/12/2002 04:38 PM

1301

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW
Room 4035
ATTN: Laurie Duarte
Washington, D.C. 20405

December 12, 2002

RE: FAR Case 2002-011

I am writing to express my concerns regarding the proposed rule (FAR Case 2002-011). This proposal, to amend the Federal Acquisition Regulations (FAR) to implement the policy set forth in the Office of Management and Budget (OMB) Memorandum No. M-02-07, Procurement of Printing and Duplicating Through the Government Printing Office (GPO) (May 3, 2002), is found in the November 13, 2002 issue of the Federal Register (Vol. 67, No. 219). I strongly urge you not to adopt these amendments because they would greatly harm the public's ability to access Federal government information.

As the librarian who oversees 1 of the approximately 1,300 Federal depository collections nationwide, I have seen the impact of the provision of Federal government information has on American citizens. I help people find government information that was produced yesterday, well over 100 years ago, and everything in between. If the policy set forth in Memorandum No. M-02-07 is adopted, I am greatly concerned that the access to future government information will be greatly curtailed. I applaud the statements in the proposal that "effective dissemination of government information is a cornerstone of [a] citizen-centric government" and that the Federal Depository Library Program (FDLP) exists "to ensure that the public has equal, efficient, permanent, and ready access to government publications." However, I believe that moving from the centralized printing and dissemination model, currently administered by the GPO, to a decentralized model suggested in the proposal would be disastrous to the public accessibility of Federal government information. Based on the following reasons, I urge that these amendments not be adopted.

First, the OMB proposed amendments violate Title 44 U.S.C. Section 501, the law stating that executive department printing "shall be done at the Government Printing Office" except for cases approved by the Joint Committee on Printing. This law can only be found unconstitutional by the courts and cannot be rescinded by an OMB memorandum. This proposal also violates Title 44 U.S.C. Section 1903 which requires agencies procuring printing outside of the GPO to bear the costs of supplying necessary copies to the Federal Depository Libraries.

Second, the current centralized printing program through the GPO provides reliable, efficient, cost-effective, and accountable permanent public access to Federal government information through the FDLP and the Sales Program. The GPO

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has created a streamlined printing process and currently 70% of all "GPO" printing is done by small business. It is crucial to maintain the responsibilities for Federal printing and the dissemination of that Federal government information to the American public in one entity (currently the GPO). This allows for the "effective dissemination" referred to in the proposal. A key factor in the FDLP's success is that it is transparent, and free, to the executive agencies. Clearly, this would not be the case if the proposed amendments were adopted.

Third, it is important to have an effective enforcement mechanism and the proposed amendments fail to address this. The language for enforcement in the proposal is vague. As an example, the proposal states that "whenever feasible, the agency should consult with the GPO's Public Printer before issuing a solicitation for a printing acquisition to determine the number of copies of a Government publication the GPO..." The current law (44 U.S.C. Section 1710) is much more clearly stated. The vague language in the proposed amendments would exponentially increase the "unacceptable record" of "fugitive" documents referred to in the memorandum.

Access to government information is vital to a free and democratic society. The FDLP is a government program that has been in place for over 100 years providing Federal government information to the American public. The OMB proposed amendments would severely damage the current effective system and dramatically reduce the ability of the American citizen to access the information of his/her government.

Once again, I strongly urge you to not adopt the Office of Management and Budget's proposed amendments to the Federal Acquisition Regulation (FAR).

Thank you for your consideration.

Sincerely,

Lisa Nickum
Government Publications Librarian
Colorado School of Mines
1400 Illinois St.
Golden, CO 80401-0029
(303) 273-3695
lnickum@mines.edu



"Greg Ringer"
<drgreg@fulbrightweb.org>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1302

12/12/2002 04:39 PM
Please respond to
drgreg

I write to oppose adoption of the amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program.

The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that students, faculty, and the public have current, comprehensive, and permanent access to the federal government information they need.

Consequently, the proposed amendments clearly violate current laws designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information.

Furthermore, OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

"Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Agencies could therefore easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Finally and perhaps most critically, OMB's proposed regulation would severely reduce Americans' access to federal government information at a time when the current Administration is overly obsessed with secrecy.

I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Greg Ringer, Ph.D.
Adjunct Professor
University of Oregon



"Ronald A. Lessard"
<lessard@norwich.edu
>

To: farcase.2002-011@gsa.gov
cc:
Subject: [Fwd: FDLP needs your help - deadline DEC 13]

1303

12/12/2002 04:29 PM

In the information age, limiting information to the public paid for by our taxes would not be responsible government. See the attached for more information on my position.

----- Message from "Lise Albury" <lalbury@norwich.edu> on Thu, 12 Dec 2002 09:48:42 -0500 -----

To: "chandra@microcheck.com" <"chandra"@microcheck.com>, "Bill Clements" <clemmey@norwich.edu>, "Carol Bowen" <carolbowen@mvalaw.com>, "cewald@nyc.rr.com" <cewald@nyc.rr.com>, "JAlbury@GIBBONSLAW.com" <"JAlbury"@GIBBONSLAW.com>, "dalbury@telcordia.com" <dalbury@telcordia.com>, "dan@computertechnica.com" <dan@computertechnica.com>, "darylalbury@comcast.net" <darylalbury@comcast.net>, "DCoombs@Landmarkcollege.org" <DCoombs@Landmarkcollege.org>, "Debra Rogler" <info@johnnycakeflats.com>, "dopie@bear.com" <dopie@bear.com>, "Eric Ewald" <EEwald@tyreeorg.com>, "EvelynD@wpgate1.ahs.state.vt.us" <EvelynD@wpgate1.ahs.state.vt.us>, "Ewald.William@epamail.epa.gov" <Ewald.William@epamail.epa.gov>, "Hal Kearsley" <hkearsle@norwich.edu>, "Heather Cassidy" <cassidyh@norwich.edu>, "jdbowen@UNCC.edu" <jdbowen@UNCC.edu>, "joyce@nami.org" <joyce@nami.org>, "kaymax@trans-video.net" <kaymax@trans-video.net>, "Lee Peters" <"lpeters"@mcla.edu>, "leslie s ewald" <shawewald@juno.com>, "Louise Murphy" <LouiseM@sbschools.net>, "lparker@norwich.edu"

1303

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Subject: FDLP needs your help - deadline DEC 13

Hi all,

the depository libraries need your help.

Comments are needed by December 13th on OMB's
Proposed Amendments to the FAR That Threaten Public Access and the
Federal Depository Library Program.

BACKGROUND: (from ALA's Washington office)

Director Mitchell E. Daniels Jr. of the Office of Management and Budget
(OMB) issued Memorandum No. M-02-07 entitled "Procurement of Printing
and Duplicating through the Government Printing Office" (GPO) on May 3,
2002. The memorandum calls for amendments to the Federal Acquisition

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Regulations (FAR) that will allow agencies to procure their printing outside of GPO. The proposed amendments were published in the Federal Register, Vol. 67, No. 219, November 13, 2002, 68914-8. The deadline for comments is Friday, December 13, 2002.

Accessible government information is an essential principle of a democratic society and a valuable public good created at taxpayer expense. ALA believes that government should provide for equitable, effective, no-fee, efficient and dependable access to and dissemination of government information in permanent and readily accessible formats. ALA further believes that a strong, centralized, coordinated and managed

federal information dissemination and access program, such as the Federal Depository Library Program (FDLP), is necessary to achieve this important goal.

CURRENT CRISIS:

OMB's efforts to have agencies procure printing outside of GPO are not new. Congress, demonstrating full support of public access and the FDLP,

successfully thwarted efforts in 1987 and 1994. Recently, Members of the 107th Congress, on a bicameral and bipartisan basis, included provisions to prevent agencies from using any appropriated funds to procure publications outside of GPO in their continuing resolutions that

fund government operations (most recently, in H.J.Res. 124). These provisions indicate Congress' strong opposition to OMB's proposed amendments to the FAR.

WHAT YOU CAN DO:

Please submit the comments I've provided below via email on the proposed

FAR to:

<farcase.2002-011@gsa.gov>

by Friday, December 13th, citing "FAR Case 2002-011" in the subject line.

It's fine to use the comments I've provided - it's more important that they hear from

you than that each comment is an original work!!

Please take a minute to do this!!!

thanks,

Lise

COMMENTS:

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52,

"Federal

Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public

access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal

Depository Library Program (FDLP) and GPO's Sales Program.

The distribution of print and microfiche publications through the FDLP and

GPO's Sales Program ensures that our citizens have current, comprehensive,

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and permanent access to the federal government information they need.
GPO

plays a critical role in providing valuable government information to the public,
and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents. Further, the proposed language allows agencies to provide GPO with publications in unusable or inappropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means."

Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software). The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files). Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination

1303

is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and individuals depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program.

Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program.

Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to

federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLP and the

Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to

federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you very much for your consideration.



"Leonard Heyman"
<lnehey@lycos.com>

12/12/2002 03:29 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1304

December 12, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am a former government employee and legal professional. I often make use of the GPO's website to access government documents such as statutes, regulations, and federal notices. I believe it would be a huge mistake to dismantle the centralized printing office which makes these documents freely available both in libraries across the country and on the Internet.

I am of course referring to to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

PLEASE respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Leonard Heyman
30 Squadron Line Rd.
Simsbury, CT 06070
USA



"Gabriel Pill-Kahan"
<gpkahan@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/12/2002 03:14 PM

1305

December 12, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Gabriel Pill-Kahan
13443 Debby St
Van Nuys, CA 91401
USA



WFBanach@aol.com

12/12/2002 03:30 PM

To: farcase.2002-011@gsa.gov

cc:

Subject: FAR Case 2002-011:

1306

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO).

I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program.

The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that our citizens have current, comprehensive, and permanent access to the federal government information they need. GPO plays a critical role in providing valuable government information to the public, and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903).

In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for

1306

providing copies to the Superintendent of Documents.

Further, the proposed language allows agencies to provide GPO with publications in unusable or inappropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means." Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software). The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files).

Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and individuals depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program. Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program. Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the

current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you for your consideration.

1306



"Cordell, Rosanne M."
<rcordell@iusb.edu>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2001-011

12/12/2002 03:09 PM

1307

I am writing to comment on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments NOT be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 NOT be adopted, for the following reasons:

First, the proposed amendments violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents. Further, the proposed language allows agencies to provide GPO with publications in unusable or inappropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means." Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software). The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files). Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate

1307

formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Law libraries especially depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program.

Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program. Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 NOT be adopted.

Please contact me if I can provide further information. Thank you for your consideration.

Rosanne M. Cordell, Head of Reference Services
Franklin D. Schurz Library
Indiana University South Bend
rcordell@iusb.edu
574-237-4209



"Bruce Jensen"
<flaco@sol-plus.net>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1308

12/12/2002 02:58 PM

This message comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). These amendments if adopted would do a disservice to Americans by diminishing our access to federal government information; this action would reduce the number of federal documents distributed through the Federal Depository Library Program (FDLP) and the GPO's Sales Program.

The distribution of print and microfiche publications through the FDLP and the GPO's Sales Program ensures that we have comprehensive and permanent access to our government's important information.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted. These proposed amendments are contrary to current laws intended to ensure permanent and reliable public access to government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments violate other federal statutes whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

What's more, the proposed amendments lack specific reporting, oversight, and enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP.

Consequently the proposed amendments would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

The proposed amendments would also weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Law libraries especially depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program.

Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program. Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to

1308

federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

I invite you to contact me if I can provide further information, and thank you very much for your consideration.

Bruce Jensen flaco@sol-plus.net
S O L : Spanish in Our Libraries
www.sol-plus.net

1309

December 13, 2002

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

RE: FAR Case 2002-011
Federal Acquisition Regulation; Procurement of Printing and Duplicating Through
the Government Printing Office; Proposed Rule

Dear Ms. Duarte:

The U.S. Chamber of Commerce appreciates the opportunity to comment on the proposed amendment to the Federal Acquisition Regulation (FAR) to implement the policy set forth in Office of Management and Budget (OMB) Memorandum No. M-02-07, Procurement of Printing and Duplicating Through the Government Printing Office (GPO) (May 3, 2002) as published in the *Federal Register* on November 13, 2002 (67 Fed. Reg. 68913). The U.S. Chamber of Commerce is the world's largest business federation, representing more than three million businesses and professional organizations of every size, sector and region of the country.

The Chamber fully supports the proposed rule as it seeks to induce competition, save taxpayer money and promote small business opportunities by eliminating restrictions that mandate the use of GPO as the single source and frees agencies to select printing from a wide array of sources that can demonstrate their ability to meet the Government's needs most effectively. Government monopolies, such as GPO, unfairly penalize the American taxpayer and our nation's businesses and sacrifice government efficiency.

The Chamber has a long-standing policy that the government should not produce goods and services for itself or others if acceptable privately owned and operated services are or can be made available for such purposes. The government saves billions of dollars by partnering with the private sector yet continues to perform countless commercial services despite the fact the private sector has continually proven it can provide the same functions at a lower price, higher quality and faster delivery time. While GPO does currently contract a portion of the government's printing to the private sector, the Chamber

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believes reform can lead to greater savings by allowing the federal government to obtain the best value it can for taxpayer dollars while providing increased opportunities and profitability for the private sector.

Allowing federal agencies to procure printing services using a best value cost-technical tradeoff system will enable each individual agency to control the cost and quality of the printing services for which they are held accountable. Under the proposed rule, they will be allowed to make procurement decisions based on the best quality, cost, and time of delivery available to meet their needs. While price is a critical factor in contracting decisions, the taxpayer and efficient operations are disadvantaged when the government is required to ignore important factors like quality and speed of service.

The amended rule removes restrictions in the Federal Acquisition Regulation (FAR) Part 8.8 that have mandated exclusive use of GPO for printing. The proposed rule provides agencies express authority to address their own printing needs by contracting with the private sector, using GPO, or, in very limited circumstances, relying on in-house or other Executive Branch printing operations. The Chamber wants to be certain that the new policy does not result in increased in-house printing operations, which would further limit private sector participation. We are pleased to see the new rule provides for limitations of in-house operations by permitting agencies to use such operations only when it can be demonstrated, based on a full account of all costs and through public-private competitions, that the best quality, price and timeliness of delivery can be obtained in-house. We urge the Administration to monitor the level of in-house operations.

The Chamber supports the intent of the rule to increase the flexibility afforded to federal agencies in printing and print procurement decisions, while we are sensitive to ensuring the largest number of companies, especially small businesses, have access to bidding opportunities. Therefore, we support including all printing contracts in excess of \$2,500 on the Government-wide gateway on the Internet for federal business opportunities, www.FedBizOpps.gov. Maximizing opportunities for all businesses to bid on federal contracts on a level playing field is a major priority for the Chamber.

Thank you for the opportunity to submit these comments on behalf of our members, large and small, that rely on an efficient, fair, competitive process in providing the federal government with goods and services to maintain and grow their businesses.

Sincerely,

R. Bruce Josten



"Barnes, Brenda"
<B.Barnes@tcu.edu>
12/13/2002 10:54 AM

To: Farcase.2002-011@gsa.gov
cc:
Subject: FAR letter.doc

1310

December 10, 2002

Via E-mail: Farcase.2002-011@gsa.gov

Attn: Laurie Duarte

General Services Administration

FAR Secretariat (MVA)

1800 F Street, N.W., Room 4035

Washington, D.C. 20405

RE: FAR case 2002-011

I am writing to express opposition to the Office of Management and Budget's proposed amendments to the Federal Acquisition Regulation (FAR). The proposed amendments ignore the needs of students, faculty, staff and the general public who use government information in my library. Please do not accept these amendments.

***ACCESS TO GOVERNMENT INFORMATION IS A KEY TO A FREE AND DEMOCRATIC SOCIETY. This is what makes us great. Our government should (and already does) provide for effective, equitable, and efficient access to Government information in permanent and readily accessible formats. The proposed amendments fail to do this.**

1310

***THE AMENDMENTS ARE A CLEAR VIOLATION OF FEDERAL LAW.** They violate 44 U.S.C. §501 by allowing agencies to procure their printing outside of the centralized and efficient Government Printing Office system. The proposed changes also violate §1903, which requires agencies that procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The FAR proposal contradicts current law by requiring the Superintendent of Documents (SuDocs) to bear these costs.

***FUGITIVE DOCUMENTS SHOULD BE PREVENTED.** While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR are so vague that the result will be MORE fugitive publications, not fewer. SuDocs and its professional library personnel provides a strong, centralized, coordinated, and managed Federal information dissemination and access program through the Federal Depository Library Program (FDLP).

***COORDINATION OF INFORMATION IS A NECESSITY.** A strong system of coordination is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current effective structure.

***EFFECTIVE ENFORCEMENT IS NEEDED.** The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

Respectfully submitted,

Brenda K. Barnes

Government Information Librarian

Mary Coutts Burnett Library

Texas Christian University

TCU Box 298400



"Chia, Linda"
<lchia@kentlaw.edu>
12/13/2002 10:38 AM

1311
To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc: "baish@law.georgetown.edu" <baish@law.georgetown.edu>
Subject: OMB memo on printing and duplicating

Ladies and Gentlemen,

Is doing things backward fashionable nowadays? Have you ever heard of the term "fugitive documents"? Ever discussed the history of U.S. government printing? Frankly, the proposal by the Office of Management and Budget (OMB) to decentralize government printing is both a big step backwards and a big mistake.

Decentralization of government printing was the norm in the 1800's before the existence of the GPO, which was created to eliminate the problem of fugitive documents and other shortcomings. Why would anyone want to drive backwards on the information superhighway? Why would anyone want to turn the clock back to the 1800's? If the stated purpose of decentralizing government printing is to save taxpayer money by reducing costs, unfortunately, the result will be increased costs, in addition to greater confusion and inconvenience for the general public. To quote a former GPO chairman, "Buying printing is not like buying paper clips." A knowledge of printing requirements and processes is essential to ensuring the best possible value. Unlike other agencies in the executive branch, the GPO has this expertise because their printing specifications were developed by knowledgeable printing experts.

The facts bear this out. For example, the news media last year reported that the Department of Labor incurred a \$30,000 printing bill for copying services that would have cost approximately one-tenth that amount if procured with the same requirements through GPO, and approximately \$500 if procured through GPO utilizing GPO recommended cost-saving measures. Thus, comparing GSA's operation, which buys many things, with GPO's, which buys only printing, does not fully address the possible impacts of decentralizing printing procurement authority back to Federal agencies.

The OMB memorandum echoes earlier unsuccessful efforts in 1987 and 1994 to transfer printing authority to executive branch agencies. Congress did not support the charge either time for the following reasons:

- Significant cost increases in Federal printing;
- Lost contracting opportunities by the small businesses that characterize the U.S. printing industry; and
- Reduced public access to Government information through Federal depository libraries.

Clearly, the idea of saving money by diverting executive branch printing away from the GPO is preposterous and not the real issue. It is more likely that this is an attempt by the executive branch, and by extension the current administration, to further their partisan program of privatization and cutting back the federal government. Unfortunately, the American public and the American taxpayer will not benefit from the scaling back of the GPO.

Linda J. Chia
Government Documents Librarian

1312



"William Wise"
<will@digitalelite.com>
12/13/2002 10:40 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

William Wise
230 S Blake Rd
Norfolk, VA 23505
USA



"Bennett Prescott"
<mainframe@3illama.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1313

12/13/2002 10:17 AM

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Bennett Prescott
14 Grant Rd
Hanover, NH 03755
USA



"Mark Rosenstein"
<mar@actwin.com>
12/13/2002 10:06 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1314

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Mark Rosenstein
129 Upland Rd
Cambridge, MA 02140
USA



"Nick Kaczmarek"
<dinomsu@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/13/2002 09:56 AM

12/15

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Nick Kaczmarek
1115 Queensgate Dr SE
Smyrna, GA 30082
USA



"Ann E Miller"
<ann.e.miller@duke.ed
u>

To: farcase.2002-011@gsa.gov
CC:
Subject: "FAR Case 2002-011"

12/13/2002 09:58 AM

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FAR Case 2002-011

I am writing to protest the proposed FAR amendments published in Federal Register Vol. 67, No. 219, November 13, 2002, 68914-8 regarding the procurement of government printing.

This is a misguided proposal which can only waste taxpayer's money, hurt small printing businesses and impede access to public information.

The OMB suggestion that the duplication of printing procurement by each agency will actually save the public money is hard to understand. Previous studies have shown that agency printing costs will increase rather than decrease. The procurement of printing products is not as simple as buying pencils or papers. Federal regulations regarding type of paper to be used, ink, not to mention the evaluation of bids, reviewing of contracts and effective distribution of material to the Federal Depository Library Program (FDLP) are all aspects of the process which each agency will need to understand and administer. Agencies choosing to print in house will have to ramp up production and by-pass the bidding process, thus cutting industry out of the loop. Biding and contracting services would be duplicated across the executive branch. The FAR also proposes that the Superintendent of Documents would bear the cost of copies printed for the Federal Depository Library Program. This directly contravenes USC Title 44 section 1903 which requires agencies who procure printing outside the GPO to bear the cost of copies for the FDLP.

The Government Printing Office (GPO) has provided centralized contracting for printing since World War II. It has been effective in steering contracts to private sector printers many of whom are also small businesses. In the OMB proposal printers looking for contracts will need to negotiate with different agencies, different guidelines and different expectations. In this case the small printer loses. It is unlikely that small business would have the ability or staff to track down bidding opportunities in a disaggregated process. The GPO Master Bid List allows small business to compete on equal footing with larger companies without the need for specialized staff or procedures.

The proposed FAR amendment pays only lip service to the distribution of information, paid for by the public, to the public. The current process allows GPO to ride agency printing orders for FDLP distribution efficiently and effectively at no cost to the agency. Materials printed by agencies alone are notorious as "fugitive documents", materials which ought to have been, but were not, distributed to depository libraries. Depository libraries provide an effective means for citizens to review government's activities and hold it accountable for its governance. The proposed FAR alludes to this, but provides no enforcement instrument or means of holding agencies accountable for continuing to participate in the FDLP.

It seems to me that under the guise of cost-effectiveness the executive branch is attempting to undercut the will of Congress, and indirectly the citizen, as explicitly stated in Title 44. Beyond the legal issues, the proposal is economically misguided. Distribution of printing functions to a multiplicity of agencies will result in an increase rather than a decrease in government spending.

The OMB proposal is misguided and should be rejected as such.

Sincerely yours,

Ann E. Miller

Ann E. Miller
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"Ferguson, Amy"
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12/13/2002 09:34 AM

To: farcase.2002-011@gsa.gov
CC:
Subject: FAR Case 2002-011

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To Whom It May Concern:

I oppose amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO) for the same reasons so well put by R. Charles Richards.

"They would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program."

"The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that our patrons have current, comprehensive, and permanent access to the federal government information they need."

"I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

"First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

"Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents. Further, the proposed language allows agencies to provide GPO with publications in unusable or inappropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means." Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software). The proposed language would likewise permit agencies to provide copies of

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documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files). Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

"Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Law libraries especially depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program.

"Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program. Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted."

Thank you for considering the concerns of myself and other librarians.

Amy Gonzalez Ferguson
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United States Government Printing Office
Washington, DC 20401

OFFICE OF THE GENERAL COUNSEL

December 13, 2002

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

RE: Comments on proposed amendments in case 2002-011

Dear Ms. Duarte:

For more than 100 years, the United States Government Printing Office (GPO) has printed and provided public access to publications for all three branches of the Federal Government. GPO's statutory responsibility to discharge these essential functions has been challenged by the Office of Management and Budget (OMB). The November 13, 2002, proposed amendments contained in Federal Acquisition Regulation (FAR) case 2002-011, would strip GPO of its responsibility to print publications for the executive branch. They would implement the policy set forth in OMB Memorandum No. M-02-07, "Procurement of Printing and Duplicating through the GPO (May 3, 2002)." This proposed revision is without legal basis and in direct conflict with the laws governing Federal printing.

The FAR revision is based on a May 31, 1996, opinion written by former Assistant Attorney General Walter Dellinger, wherein he concluded that the current printing statutes are unconstitutional under the doctrine of separation of powers. Yet on two earlier occasions, September 13, 1993, and March 11, 1994, Mr. Dellinger opined that the current statutes requiring executive branch agencies to print through GPO *are not unconstitutional* and do not violate the separation of powers clause. The fact is that this issue has never been litigated and no constitutional process involving Congress or the courts has ever deemed the current printing statutes "unconstitutional."

Congress has specifically rejected similar proposals before, in 1987 and 1994. The reasons are clear: analysis shows that establishing duplicative printing capability among thousands of executive branch entities will raise taxpayer costs for Government printing, jeopardize the ability of small business printers to win Government printing contracts, and impair public access to Government

information through Federal depository libraries and associated Superintendent of Documents distribution programs. GPO has testified on these impacts before Congress; more detailed information on these impacts is included in the enclosure.

Consistent with prior action, Congress has enacted legislation that specifically prohibits the implementation of OMB's May 3, 2002, memorandum. The President has signed this legislation into law. The General Accounting Office (GAO) has concluded that the legal effect of the new prohibition is clear: it precludes the use of appropriated funds to implement or comply with the OMB directive. The GAO has also concluded that the use of appropriated funds to print or procure Federal publications other than by or through the GPO would violate the Antideficiency Act, resulting in certifying and disbursing officer liability.

Any changes to the FAR that ignore existing statutes in favor of a mere agency opinion should be viewed with the utmost diligence and legal responsibility. As Federal employees, each of us has a solemn obligation to ensure that our Nation's laws are faithfully executed. As Walter Dellinger himself once said:

When the President's obligation to execute laws enacted by Congress is in tension with his responsibility to act in accordance with the Constitution, questions arise that really go to the very heart of the system. And the President can decline to comply with the law, in our view, only where there is a judgment that the Supreme Court has resolved the issue.

Newly-confirmed Public Printer Bruce R. James believes that the real issue facing the GPO, OMB, Congress, Federal agencies, and the public is the construction of a new framework for dealing with Federal information in the 21st century. Rather than making significant and potentially injurious changes to the established system of Government printing, a system rooted in a technological era that is passing by, he has suggested that the stakeholders in this system should instead work together to develop beneficial and lasting changes, not just to printing policy, but to a Government information policy in general that is designed to meet both our current and future needs.

The Public Printer's direction is one in which we can work cooperatively with OMB and the other communities of interest in Federal printing and information policy. We respectfully ask the FAR Council to reconsider and withdraw the changes proposed in case 2002-011.

Sincerely,

ANTHONY J. ZAGAMI
General Counsel

Enclosure

Impact of the Proposed FAR Revision

The proposed FAR revision will lead to significantly increased costs for Government printing.

- The claim that agencies will save \$50 - \$70 million if they are not required to use GPO has not been substantiated. In FY 2001, GPO generated total printing procurement surcharge revenues of only \$32.5 million.
- As the result of decentralizing Government printing, the proposed FAR revision would increase printing costs, based on the findings of previous studies.¹
- GPO paid \$415 million for procured printing in FY 2001. If agencies decide to procure work themselves from the private sector, annual executive branch printing costs could increase by 25%, or \$103.8 million. The increased costs would result from:

Duplication of effort – GPO serves Federal printing needs at approximately 6,300 billing address codes. For each one of these operations to devote just one-tenth of an FTE to printing procurement would require 630 FTE's. GPO has about 330 FTE's devoted to printing procurement nationwide.

Loss of specialization – It would cost the Government more for each agency to provide the same comprehensive range of procurement services that GPO offers in support of printing procurement (setting print specifications, administering printing contracts, ensuring competition, monitoring quality and resolving quality problems, ensuring fulfillment of statutory distribution requirements, providing voucher exam and payment services, providing legal advice, resolving contract disputes, etc.).

Reduced competition - More than 16,000 private sector printers are on GPO's Master Bid List, representing about 40% of the establishments in the printing industry. Agencies are not likely to maintain the same universe of competition, resulting in increased prices.

Greater burdens on contractors - Without one-stop shopping for all printing contracts through GPO (agencies will only be required to advertise for printing contracts worth more than \$2,500), printing

¹ GAO, Agency Printing Plants--Choosing the Least Costly Option, PLRD-81-31 (June 19, 1981); OTA, Informing the Nation: Federal Information Dissemination in an Electronic Age, (October 1988); JCP, Oversight Hearing on Consolidation of Department of Defense Printing Services, S. Hrg. 102-907 (August 4, 1992); JCP, Review of the Defense Printing Service, S. Hrg. 103-266 (July 15, 1993); various reports of the GPO Contractors Coalition, 1993-94; letter from Neil J. Stillman, Deputy Assistant Secretary for Information Resources Management, HHS, to Sally Katzen, Administrator, Office of Information and Regulatory Affairs, OMB, August 12, 1997; letter from Thomas J. Muldoon, Acting Inspector General, GPO, to Joseph J. Green, Assistant IG for Public Health Service Audits, HHS, September 24, 1997; Harold C. Relyea, "Public Printing Reform: Issues and Actions," Congressional Research Service, Report for Congress, 98-687 GOV (updated May 10, 2002), p. 19.

contractors would have additional sales and paperwork costs, also driving up prices.

- If agencies take the printing they are currently procuring through GPO and produce it in their own printing and duplicating plants, annual executive branch printing costs could increase by as much as 50%, or \$207.5 million. Federal in-plant operations are generally far less efficient than private sector plants. The proposed FAR revision establishes no effective mechanism for monitoring the “full cost comparisons” required to justify in-plant printing and duplicating by agencies.
- Other impacts from the proposed FAR revision would include the loss of central responsibility for applying uniform standards of print quality and for monitoring application of statutory requirements for the use of recycled paper, alkaline and permanent papers, and vegetable oil-based printing inks. GPO’s in-plant production capability supporting congressional printing requirements would also be impacted.

The proposed FAR revision will injure small business printers.

- The printing industry is predominately made up of small businesses, and GPO deals extensively with small business printers in buying printing. More than 70% of the 16,000 printers on GPO’s List are small businesses. In FY 2001, GPO procured about 148,000 printing jobs. Small businesses received 77% of the contracts awarded. This compares with a 22.7% small business share of Federal prime contracts during the same period, as shown in the Small Business Administration’s Performance and Accountability Report for FY 2001.
- Small business printers will be injured under the proposed FAR revision as the result of:

Loss of access to jobs under \$2,500 – The proposed FAR revision will require public posting and competitive sourcing for all jobs valued at more than \$2,500. More than 80% of all printing orders procured by GPO are valued at \$2,500 or less. As a result, much of this work would simply be lost to small business printers as the result of non-competitive credit card purchases.

New competition from NAFTA trade partners -- Under executive branch procurement rules, printing jobs valued at more than \$25,000 would be subjected to competition from NAFTA trading partners. Contracts made available under GPO’s Printing Procurement Regulation are subject to the provisions of the Buy America Act.

Increased paperwork burdens - GPO’s one-stop-shopping also features standardized forms and procedures, and ensures the uniform application of Federal rules requiring the use of vegetable

oil-based inks, recycled paper, and alkaline and permanent papers. With the dissolution of standardized procedures under the proposed FAR revision, small printers would be burdened with more paperwork and the disparate application of rules and regulations.

Decreased contracting opportunities resulting from in-plant production – Agencies that hold work for production in their own printing and duplicating facilities will reduce competitive contracting opportunities for small printers.

- With reduced opportunities for winning contracts and the resultant loss of businesses and jobs among small business printers, there would also be a loss of tax revenues and increased costs for unemployment and related services.

The proposed FAR revision will impair public access to Government information.

- The link between the production and distribution of Government documents in GPO is the source of publications for GPO's Federal Depository Library Program (FDLP), as well as GPO's cataloging and indexing program, statutory distribution program, sales, and international exchange program. Even *GPO Access* uses the system to monitor for new publications.
- Publications that belong in the FDLP and related programs but are not included are called "fugitive documents." Previous estimates have placed the rate of fugitive documents in the neighborhood of 50%, which corresponds roughly to the amount of Federal printing that GPO estimates does not come through GPO. A primary cause of "fugitive documents" is agencies that do not print through GPO.
- There is still a substantial amount of Government information for which no reliable online alternative exists, and problems with ensuring permanence and other issues are still present for many online products. In FY 2001, GPO distributed a total of 5.9 million copies of approximately 14,700 tangible (print, microfiche, CD-ROM) titles from all three branches of the Government to depository libraries.
- To supply GPO's distribution programs, the proposed FAR revision would require that GPO either purchase additional copies from the originating agency or printing contractor, go "back to press" using a single copy supplied by the agency, or use a copy supplied by "electronic means" as the basis for producing an additional print run. This proposal is defective for the following reasons:

It violates current law -- 44 U.S. Code 1903 states that "[t]he cost of printing and binding those publications distributed to depository libraries obtained elsewhere than from the Government Printing Office, shall be borne by the components of Government responsible for their issuance..."

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It will generate increased costs – Going back to press for distribution copies is more expensive to the Government than obtaining the necessary number of copies prior to printing.

Agencies historically are unreliable in their cooperation with distribution requirements – In a 1998 review of the National Institutes of Health printing program by the Department of Health and Human Services Inspector General, 77 percent of the publications which were produced outside GPO, but which should have been sent to GPO for the FDLP, were not provided to GPO for depository library distribution.

There is no assurance of standardization in print files – Files could be in proprietary page description languages. They may not be in formats that could be readily disseminated via the Internet for search and retrieval in lieu of printing. These factors could lead to delays in making information accessible, and raise additional issues regarding authentication, exact replication, and the official nature of the reproduced versions.

- Breaking the production/distribution link in GPO would also cost the public the convenience of buying their own copies of Government publications, which they currently enjoy through GPO's sales program.

FREDERIC G. ANTOUN, JR.

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December 12, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, N.W., Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

RE: Comments on FAR Case 2002-001

For the past 15 years I have been actively engaged in providing advice and assistance to hundreds of printers, a printing trade association, government contractors, and federal departments and agencies. I have also attempted to provide information, advice, and assistance to OMB staff as it attempts to modernize and reform the federal print procurement system.

As an attorney, I am keenly aware of the legal dispute regarding the constitutionality and enforceability of 44 U.S.C. 501. While that issue may ultimately affect the way in which executive branch agencies meet their printing needs, no comments by my office or anyone else can resolve that dispute. Therefore, my comments address only issues that I believe relate directly to the efficiency and effectiveness of the proposed FAR regulation.

While there are a number of minor issues that could be addressed, including the need for an integrated, virtually centralized electronic procurement system, I have confined my comments to five major areas that I believe must be addressed in order to provide a workable and fair print procurement system. Those comments are attached.

My attached comments are submitted on my behalf; not on behalf of, for, or with the approval of any present or past legal or consulting client. I believe that the information is both accurate and objective.

Sincerely,



Frederic G. Antoun, Jr.

FGA/mhw

Attachment: Comments on FAR Case 2002-001

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Comments on Proposed FAR Regulation [FAR Case 2002-011]

Submitted by:

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1. There is universally strong support for a transition to best value type awards in the purchase of Federal Government print.

Printers want consideration of good quality, service, and on-time delivery. Agencies want the best value for the taxpayer's dollars. Even GPO is working with its agency customers and vendors to develop a best value type award criteria that can take advantage of its decades of detailed printer performance data.

2. The proposed regulations do not distinguish between agency's use of GPO as a private sector print procurement agent and GPO's role as a printer that actually produces printed products.

GPO has, by statute, historically filled two separate and very different roles:

a. GPO, the "Government Printer," operates a large printing plant in Washington, D.C., where it produces not only work for the U.S. Congress, but also Executive Branch agencies;

b. GPO acts as a buying agent for Executive Branch agencies, contracting out their printing needs to the private sector.

Over the last two decades, GPO's role as a private sector buying agent for Executive Branch agencies has increased. Today, GPO buys between 75% and 80% of Executive Branch printing directly from the private sector, after publication of all job opportunities, and opened competition.

These two roles are separate and distinct, but they seem to be treated together in the FAR regulation.

My understanding of the intent of the FAR regulation, based on Director Daniels and OMB staff statements, is to allow GPO to continue to serve Executive Branch agencies as a buying agent that purchases printing for agencies from the private sector, so long as the agency determines that GPO is offering it the best combination of price, quality, and service for that service. Thus, use of GPO would become optional (as opposed to mandatory).

On the other hand, I understand that the intent of the FAR regulation with regard to actual print production by GPO is that, after January 2004, GPO will have to **compete on a job-by-job basis with the private sector for printing GPO wishes to produce in its plant.**

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By blurring the distinction between these two services, the FAR regulation sets up an impossible situation for both private sector print contractors and Agencies. If GPO has to compete each job it wants to buy for the agencies as a broker, will the private sector printer have to submit two bids: one to GPO; and one directly to the agency? This is not only confusing, but also wasteful. If agencies determine that GPO offers them a better value in print procurement services from the private sector than they can obtain by duplicating those services in-house, will they be prevented from using GPO as their buying agent? Would such a system not be as restrictive and void of choice as the one it replaces?

Agencies must be given the latitude to use GPO as their print-buying agent if the agency determines that doing so provides the best procurement service, considering price, quality and service. Nothing should prevent the agency from establishing award requirements that its agent will apply on its behalf (standardized best value type criteria and formulas, objective criteria, etc.).

On the other hand, if GPO wishes to produce the work in-house (not buy it from the private sector as a purchasing agent) then it should have to compete on each job beginning in 2004.

3. The posting period established for FedBizOpps is too long to adequately meet agencies' needs for printed products.

Over the years, the "turn around time" (the time between the issuance of the solicitation and shipping or delivery of the printed product) for printing jobs produced by the private sector for government agencies, whether through GPO or directly, has continuously shortened.

Typical turn around times run between 3 and 10 days for jobs between \$10,000 and \$25,000; jobs under \$10,000 routinely have turn around times between 2 days and 5 days. Jobs under \$2,500 (80% of the number of jobs purchased from the private sector for agencies through the GPO) often require a quote to be submitted within 1 or 2 days. Statistics maintained by the leading government printing bid service, ABC Advisor's, Inc., show that 58% of the agency print jobs required quotes to be submitted within less than 2 business days of posting.

This shortening of not only the time to submit a quote, but also the time to obtain the product has been facilitated by two factors: 1) significant advances in printing technology; and 2) the proliferation over a number of decades of small, conveniently located printing businesses that are able to meet customer needs on what often seems like an impossibly short schedule.

Now that agency customers have become used to being able to obtain their printing almost on demand (hence the term, "print-on-demand"), there is no way to go back to the old days of leisurely bid or quote preparation and lengthy production/delivery cycles.

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The problem presented by the proposed regulation is that while it reduces the FedBizOpps publication level from \$25,000 to \$2,500, it does not shorten the 15 day time period provided by the FAR for posting of these job opportunities.

Unless this time period is reduced, the proposed system simply will not meet federal agencies' needs in today's fast moving environment.

From a logical view point, it seems only reasonable that since the job amount required to be posted for printing jobs is dramatically reduced by the new FAR in order to help small businesses, that the time a job is required to be posted for these printing jobs should likewise be dramatically reduced in order to meet the agencies' needs, and take advantages of the services that the small businesses have to offer.

The normal time between posting and "opening" of jobs under \$25,000 should be reduced to a minimum of 1 day. The normal time between posting and "opening" of jobs over \$25,000 should be reduced to 3 days. These time periods reflect the typical time periods agencies have become used to over the past decade.

4. The proposed regulation needs to be revised to address the absence of contract opportunity publication for jobs under \$2,500, in order to give small businesses access to this work.

For several decades, jobs under \$2,500 have made up over 75% of GPO's volume of orders from federal agencies. Last year, for example, the 117,785 orders procured from the private sector by GPO for federal agencies costing under \$2,500 constituted 80% of GPO's outsourced orders.

Typically, large national and multi-national companies do not produce these low-dollar-volume, quick-turn-around jobs. Rather, they are produced by small printing shops located around the country.

In the last year, 77% of all GPO's outsourced print orders went to small businesses. This volume is very significant to thousands of small printers in the private sector.

One of the advantages of the GPO system for these small printing companies is that they can learn of the job opportunities through a private sector bid service that obtains the solicitations from GPO, sorts them according to the printer's needs, and sends them directly to the printer via fax, email, or on the web.

Agencies have found that the service, quality, and production time available in the printing industry is better than that of government in-plants.

While the proposed FAR breaks new ground in lowering the dollar value threshold for publication on FedBizOpps to \$2,500 (from \$25,000), it does not address the small business need to easily access the many print job opportunities under \$2,500, in order to submit a quote.

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Because of the small dollar value of these jobs and very short quote and production cycles, classic sales efforts and “opportunity discovery” efforts cannot be cost justified for small businesses. Rather, they need a system that will provide these opportunities to them – which has been provided by private sector bid services for more than 25 years. Under the GPO system, the private sector bid services obtain copies of solicitations from the GPO, then sort them and instantly deliver them to small businesses around the country. There is currently no similar system in place under the FAR proposal.

This problem could be addressed in several ways:

- a. The FAR could require that agencies that buy printing without going through GPO make copies of their solicitation available for sale (at cost) to private sector companies to distribute them to small printers (like the current solicitation subscription services operated by GPO and many agencies, but see proposed FAR Case 2001-032); and/or
- b. The FAR could require that agencies that buy their own printing post the solicitation (not just a synopsis) on either a government or private sector web-based portal, allowing small businesses access to these job opportunities; or
- c. Send the job to GPO for open, competitive procurement.

Failure to address this problem will harm small businesses. It will also waste taxpayer dollars: the price on these 117,785 jobs will increase substantially due to lack of competition. A recent study of government printing jobs shows an unacceptable price increase without competition. http://www.printlaw.com/print_study.pdf

5. Print-specific quality standards would significantly increase the new system’s efficiency.

I have received many calls from printers who contract to produce work for federal agencies through the GPO (the current system) inquiring as to whether there will be universal standards under the new OMB-proposed agency print procurement system. Printers are rightfully concerned, as are some of their agency customers, that the longstanding GPO quality system established in GPO’s *Quality Assurance Through Attributes Program* will not be in effect under decentralized agency procurement, and that neither printers nor customers will therefore know what quality or standards are expected on any given job.

Given the 130-year old GPO mandatory system, agencies have never had a need to adopt standards for print production or print products. With the GPO as a mandatory source, even buyers uneducated in print production standards could safely specify a job at one of the GPO’s predefined quality levels (Level 4 through Level 1) and such specification would incorporate into the job quality and performance standards which would protect the agency, and let the printer know exactly what was expected.

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Without a system of standards, agencies may well not receive what they expect.

I strongly encourage OMB to review GPO's Supplemental Specifications in *Contract Terms* and the *Quality Assurance Through Attributes Program*, revise them as necessary, and incorporate them into the FAR, so that agencies will have quality and performance standards that protect the government in its purchase of printing, and the printers will have requirements for production of the work so that they will know what their customer expects. Of course, agencies could supplement or override such quality requirements when appropriate.

Alternatively, OMB either through the FAR or through another management vehicle could require agencies to reference GPO's QATAP Standards (Level 4 through Level 1) when ordering print.

Comments submitted by:

Frederic G. Antoun Jr. Esquire
14 North Main Street, Suite 406
Chambersburg, PA 17201-1813

717-261-0998
antoun@printlaw.com

Small Agency
C O U N C I L

1320

December 13, 2002

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

Dear Ms. Duarte:

I am writing on behalf of the Small Agency Council with regard to the Federal Acquisition Regulatory Council's proposal (FAR Case 2002-011) to rescind the mandatory requirement to use the Government Printing Office for all printing requirements. The Council is made up of about 80 small, independent Federal agencies and the General Services Administration is an Associate Member of the Council.

In concept, there is broad support for the rule's intent to allow improved competition. The primary concern coming from small Federal agencies has to do with the \$2,500 threshold for advertising a procurement announcement. We believe the threshold is far too low to be effective. By keeping it so low, the rule places an additional burden and costs for small agencies who have frequent printing requirements (e.g., agency reports and studies). This requirement actually makes it more difficult to acquire printing services than non-printing services, for which the advertising threshold is \$25,000. It seems to add an unnecessary step to the procurement process, and will likely require the additional expense of government administrative and procurement personnel wading through far more proposals than is necessary for services of such small dollar value.

The objective of advertising is to encourage competition and provide opportunities for small businesses. But the Federal Acquisition Regulations already require that acquisitions exceeding \$2,500 be competed to the maximum extent practicable and that special consideration be given to small businesses for procurements between \$2,500 and \$100,000. In addition, we already have the requirement for announcement in FedBizOpps of procurements estimated at \$25,000 or higher. Therefore, we recommend the \$2,500 threshold be raised to \$25,000.

1320

A second concern has been expressed by small agencies that the one year limit on indefinite-quantity and requirements contracts for printing requirements is too short. We believe more benefit would be gained by both the agencies and the vendors if there was a longer term arrangement allowed.

We urge the General Services Administration to take these concerns under consideration and make appropriate adjustments to the current proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "John Seal". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Seal".

John Seal
Chairman
Small Agency Council



"Cindy Sauerwein"
<csauerwein@dddcom
pany.com>

12/13/2002 11:59 AM

To: farcase.2002-011@gsa.gov
cc: "Donald Dilks" <ddilks@dddcompany.com>, cathy@csa-dc.org
Subject: Support Federal Printing Reform

1321

FOR IMMEDIATE ATTENTION!!!

DDD Company supports the Administration's efforts to reform government monopolies, such as the Government Printing Office (GPO) which unfairly penalizes the American taxpayer and our nation's businesses, and sacrifices government efficiency.

DDD Company has been a government contractor since 1980 when our company was formed to respond to the need for efficient, cost-effective outsourcing contractors. We have served many government agencies through long-term contractual commitments.

The proposed rule seeks to encourage competition, save taxpayer money and promote small business opportunities by eliminating restrictions that mandate the use of GPO as the single source, and frees agencies to select printing from a wide array of sources that can demonstrate their ability to meet the government's needs most effectively.

The government should rely upon the private sector to provide goods and services necessary for the operation and management of federal agencies and departments. Outsourcing reduces the size of government and increases efficiency by limiting government to performing its core mission functions.

While GPO does currently contract a portion of the government's printing to the private sector, greater savings can be achieved by giving federal agencies explicit authority to obtain the best value it can for taxpayer dollars. Therefore, we support the proposed GPO reform.

Respectfully yours,

Donald Dilks
CEO/President
DDD Company

8000 Corporate Drive
Suite 100
Landover, MD 20785-2239
(301) 731-4595



1322

December 13, 2002

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

RE: FAR Case 2002-011
Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office; Proposed Rule

Dear Ms. Duarte:

The Contract Services Association of America of America (CSA) appreciates the opportunity to comment on the proposed amendment to the Federal Acquisition Regulation (FAR) to implement the policy set forth in Office of Management and Budget (OMB) Memorandum No. M-02-07, Procurement of Printing and Duplicating Through the Government Printing Office (GPO) (May 3, 2002) as published in the Federal Register on November 13, 2002 (67 Fed. Reg. 68913).

CSA is the premier industry representative for private sector companies that provide a wide array of services to Federal, state and local governments. CSA members are involved in everything from maintenance contracts at military bases and within civilian agencies to high technology services, such as scientific research and engineering studies. Many of our members are small businesses, including 8(a) certified companies, small disadvantaged businesses and women-owned and Native American owned firms. The goal of CSA is to put the private sector to work for the public good.

The membership of CSA fully supports the proposed rule. It is intended to encourage greater competition, save taxpayer money and promote small business opportunities by eliminating restrictions that mandate the use of GPO as the single source for government printing. It would free agencies to select printing from a wide array of sources that can demonstrate their ability to meet the Government's needs most effectively. Government monopolies, such as GPO, unfairly penalize the American taxpayer and our nation's businesses and sacrifice government efficiency.

As we continue to reinvent government we must focus on competition. And that focus requires a balanced, responsible and unyielding commitment to exploring new ideas, challenging old prejudices and looking carefully at what services the government must provide. It also requires a careful examination of who, inside or outside of government, is best positioned to provide each service in the most efficient and effective way. The government saves billions of dollars by partnering with the private sector yet continues to perform countless commercial services despite the fact the private sector has continually proven it can provide the same functions at a lower price, higher quality and faster delivery time. While GPO does currently contract a portion of the government's printing to the private sector, CSA believes reform can lead to greater savings by allowing the federal government to obtain the best value it can for taxpayer

1322

dollars while providing increased opportunities and profitability for the private sector.

Allowing federal agencies to procure printing services using a best value cost-technical tradeoff system will enable each individual agency to control the cost and quality of the printing services for which they are held accountable. Under the proposed rule, they will be allowed to make procurement decisions based on the best quality, cost, and time of delivery available to meet their needs. While price is a critical factor in contracting decisions, the taxpayer and efficient operations are disadvantaged when the government is required to ignore important factors like quality and speed of service.

The amended rule removes restrictions in the Federal Acquisition Regulation (FAR) Part 8.8 that have mandated exclusive use of GPO for printing. The proposed rule provides agencies express authority to address their own printing needs by contracting with the private sector, using GPO, or, in very limited circumstances, relying on in-house or other Executive Branch printing operations. CSA wants to be certain that the new policy does not result in increased in-house printing operations, which would further limit private sector participation. We are pleased to see the new rule provides for limitations of in-house operations by permitting agencies to use such operations only when it can be demonstrated, based on a full account of all costs and through public-private competitions, that the best quality, price and timeliness of delivery can be obtained in-house. We urge the Administration to monitor the level of in-house operations.

CSA supports the intent of the rule to increase the flexibility afforded to federal agencies in printing and print procurement decisions, while we are sensitive to ensuring the largest number of companies, especially small businesses, have access to bidding opportunities. Therefore, we support including all printing contracts in excess of \$2,500 on the government-wide gateway on the Internet for federal business opportunities, www.FedBizOpps.gov. Maximizing opportunities for all businesses to bid on federal contracts on a level playing field is a major priority for the CSA and its membership.

Thank you for the opportunity to submit these comments on behalf of our members, large and small, that rely on an efficient, fair, competitive process in providing the federal government with goods and services to maintain and grow their businesses.

Sincerely,



Gary Engebretson
President
Contract Services Association of America

1000 Wilson Blvd, Suite #1800
Arlington, VA 22209
70-3243-2020

1323



"Jason Cluggish"
<j_cluggish@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/13/2002 11:59 AM

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Jason Cluggish
190 1/2 Adams St
Waltham, MA 02453
USA



"Jared Hudson"
<jhudson@volumehost
.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1324

12/13/2002 12:01 PM

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Jared Hudson
650 W Center St
Apt 13
Fayetteville, AR 72701
USA



"Arlene Weible"
<aweible@pacifier.com
>

To: farcase.2002-011@gsa.gov
CC:
Subject: FAR CASE 2002-011

1325

12/13/2002 12:22 PM

FAR Secretariat<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />
General Services Administration
Comments on FAR case 2002-011
Submitted via the Internet to--farcase.2002-011@gsa.gov
December 13, 2002

RE: FAR CASE 2002-011

I am pleased to have the opportunity to comment formally on the proposed FAR amendments to implement OMB Memorandum No. M-02-07 entitled "Procurement of Printing and Duplicating through the Government Printing Office" (GPO)(May 3, 2002). This proposed rule was published in the *Federal Register*, Vol. 67, No. 219, November 13, 2002, 68914-8.

I have been a member of the library community for over 10 years, and have a strong interest in federal information policy and the Federal Depository Library Program (FDLP). I know from the first-hand experience of working in several federal depository libraries the importance and impact that government information has on the health and lives of all Americans, as well as on the economic well being of our nation and on the preservation of our democracy.

Accessible government information is an essential principle of a democratic society and a valuable public good created at taxpayer expense. The American public relies on unfettered access to information by and about their government to actively participate in our democracy and to hold government accountable for its actions. Concurrently, government has an affirmative obligation to disseminate and provide broad public access to its information, to guarantee its authenticity and integrity, to ensure that government information remains in the public domain, and to ensure its continuous, permanent availability and preservation. In the print environment, the Federal Depository Library Program (FDLP) has proven to be the most efficient partnership program between Congress, depository libraries, agencies and the GPO to provide government publications to the American public. The FDLP requires a strong system of coordination and centralization, including an effective and transparent system to bring government publications into the FDLP. I believe the proposed FAR change does not create such a system, choosing instead to leave a void in the place of the current effective structure.

The primary problem with the proposed FAR is that it violates current statutory law. The proposed changes to the FAR are in violation of 44 U.S.C. §501 which states that "All printing, binding, and blank-book work for Congress, the Executive Office, the Judiciary, other than the Supreme Court of the United States, and every executive department, independent office and establishment of the Government, shall be done at the Government Printing Office...." The link between print procurement through GPO and the Office of the Superintendent of Documents (SuDocs) that administers the FDLP has served the American public very well. When agencies procure publications through the GPO as mandated by law, the SuDocs is able to ride the procurement order so that sufficient copies for depository libraries, the GPO Sales Program and other dissemination services are procured at very low cost. The proposed changes to the FAR are also in violation of 44 U.S.C. §1903 which states that "The cost of printing and binding those publications distributed to depository libraries obtained elsewhere than from the Government Printing Office, shall be borne by components of the Government responsible for their issuance..." According to law, when agencies procure outside of GPO, the agency itself is responsible for the costs associated with providing a sufficient number of copies for depository distribution. The SuDocs is not authorized to bear the costs obtaining copies of publications produced outside of the GPO, nor does it have sufficient appropriations to fund these costs. The FAR amendment proposing that the GPO/SuDocs would bear the costs of producing agency publications for public access through the FDLP is contrary to current law, and would cause an ambiguous legal conflict that would likely lead to even less compliance by executive agencies.

1325

Additionally, Congress has explicitly voiced its strong disagreement with the Administration on the proposed amendments to the FAR by including provisions in the continuing resolutions funding government operations that would prevent agencies from using any appropriated funds to procure publications outside of GPO.

Agencies that today legally bypass GPO for printing procurement, such as through a waiver, are obliged to provide a) one tangible copy to the SuDocs for cataloging purposes under 44 U.S.C. 1710, and b) the necessary number of copies for depository libraries. Unfortunately, the record of compliance with these dual requirements by agencies that receive a printing waiver is not reassuring. For example, a 1998 review by the Department of Health and Human Services Inspector General found that components of the National Institutes of Health receiving such waivers had not complied with either requirement (44 USC §1903 and §1710) for 77% of the publications they produced outside of GPO. This discouraging statistic offers a snapshot of the difficulties of enforcing agency compliance when government publications are produced outside of GPO.

The proposal suggests that a clause be inserted into procurement contracts requiring agencies to provide a copy of publications to GPO for distribution to libraries. While the intent of this clause is admirable, the vague nature of the language and lack of specific guidelines, standards, and procedures will likely do little to ameliorate the further proliferation of "fugitive documents". In addition, this proposal appears to presume that agencies would transmit electronic files to GPO in standardized, usable formats that could then be efficiently made available to the public in electronic formats in a cost-effective way. Without such specifications and a coordinated national program to systematically capture, preserve, and maintain ongoing access to electronic government data, important information is lost every day as files come and go from agency Web sites and computer servers. The information becomes inaccessible and thus useless to the American public whose tax dollars have supported its creation.

Section (e) of the proposed amendment states that "Whenever feasible, the agency should consult with the GPO's Public Printer before issuing a solicitation for a printing acquisition to determine the number of copies of a Government publication the GPO may wish to obtain and the agency shall take reasonable and appropriate steps to assist GPO if GPO wishes to purchase copies from a private contractor employed by the agency." This paragraph violates 44 U.S. Code Section 1903, which states that "[t]he cost of printing and binding those publications distributed to depository libraries obtained elsewhere than from the Government Printing Office, shall be borne by the components of Government responsible for their issuance..." For the purposes of the Federal Depository Library Program, GPO is not authorized to bear the cost of copies produced "elsewhere." Moreover, as the supplementary information to this proposed amendment notes, Section 4 of the Continuing Resolution for FY 2003, Public Law 107-240 (H.J. Res. 122) prohibits the expenditure of appropriated funds for printing outside GPO. So, it is legal neither for the agencies nor for GPO to pay for FDLP copies produced "elsewhere."

Even were it legal for GPO to bear these costs, the proposed amendment sets up no guidelines nor mechanism for the over 6,000 entities generating printing in the federal government to assist them to consistently remember to follow the requirement to interact with GPO. It simply assumes that they will accomplish what to them is, at best, a secondary goal, the provision of copies to depository libraries. With no oversight proposed and no enforcement mechanism in place, it is unlikely the intent of the amendment will be achieved, which is "to improve dramatically the depository library system by ensuring that all Government publications are in fact made available to the nation's depository libraries."

The proposed FAR change is problematic in two respects: first, it violates current law; and second, it will make the problem of fugitive documents, which it purports to ameliorate, worse. Even though the Office of Management and Budget disagrees with these provisions of Title 44, they should not propose a change to the FAR that simply ignores the law. This proposed change in regulation has drawn strong opposition from Congress, on a bipartisan and bicameral basis. As written, without specific detail as to how agencies would comply with providing publications to the Superintendent of Documents for cataloging and distribution of print materials or dissemination of electronic government information, it fails to adequately support the needs of the depository community or the public. While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR amendment are so vague that the result will most certainly be more fugitive publications, not fewer. The lack of any proposed oversight and any enforcement mechanism will make it unlikely that the amendment will achieve its stated goal: "to improve dramatically the depository library system by ensuring that all Government publications are in fact made available to

1325

the nation's depository libraries.”

While the proposed change may seem reasonable on its face to those unfamiliar with the workings of the Federal Depository Library Program, it lacks the necessary ingredients of coordination and centralization that are as necessary in the electronic environment as they are in the print world. Today, the SuDocs, working with its professional library personnel, provides a strong, centralized, coordinated and managed Federal information dissemination and access program through the FDLP. Without this strong central coordination, my job as a federal depository librarian who assists citizens in obtaining government information will be made more difficult. But of even more concern is citizens' current and future ability to gain access to the information they pay for with their tax dollars. Fundamentally changing a system of information distribution, access, and preservation that has worked relatively well for nearly 100 years without adequate study is, in my opinion, the height of folly. I would urge further study of the problems this proposal intends to “fix”, with special attention being given to providing more concrete evidence that the proposal will save money while also improving the FDLP.

Thank you for the opportunity to comment,

Arlene Weible
1628 Egan
Denton, TX 76201
aweible@pacifier.com

Comments compiled with assistance of the American Library Association's Washington Office.



"Bruce Bullis"
<bbb@adobe.com>
12/13/2002 12:16 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1326

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Bruce Bullis
326 Jackson St
Sunnyvale, CA 94085
USA



"Bill O'Brien"
<bobrien@unitedparadyne.com>

12/13/2002 12:19 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: Federal Printing Reform

1327

United Paradyne Corporation fully supports the proposed GPO reform. Government monopolies like the GPO unfairly penalize commercial businesses. Our company exists today because of the federal government's willingness to outsource it's non-core services to the private sector. Eliminate the restrictions that mandate the use of GPO as the single source. It will both save tax dollars and create a more efficient government.

Respectfully,

William E. O'Brien
Contracts Manager
United Paradyne Corp
212 W. Carmen Ln
Santa Maria, CA 93458
805-928-9855



"Paul Andrel"
<pjandrel@rcn.com>
12/13/2002 12:47 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1328

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Paul Andrel
38 Windsor Ave
Upper Darby, PA 19082
USA



"Jim Cook"
<jimc@bearmask.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 12:51 PM

1329

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jim Cook
1629 38th Ave
Seattle, WA 98122
USA



"Ryan Weiss"
<eff@draziw.net>

12/13/2002 12:59 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1330

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ryan Weiss
5648 Irvine Avenue
North Hollywood, CA 91601
USA



"John Lange"
<madsrv@netdoor.com>

12/13/2002 12:08 PM
Please respond to
madsrv

To: farcase.2002-011@gsa.gov
cc:
Subject: Outsourcing GPO Work

1331

Madison Services supports the Administrations position to outsource GPO work thereby saving taxpayer's money and reducing the size of Government. The Government should rely more upon the private sector to provide goods and services that are not "inherently governmental" in nature.

John Lange
President

Madison Services, Inc.
601/856-4346



"Marie Camacho
Bellows"
<mcbellows@sbcglobo
l.net>

12/13/2002 01:20 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

13 32

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Marie Camacho Bellows
3810 Inwood Rd Apt 211
Dallas, TX 75209
USA

1333



"Shelkrot, Elliot"
<ShelkrotE@excen.library.phila.gov>

12/13/2002 12:57 PM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc: "Briggs, Robert" <BriggsR@excen.library.phila.gov>, "Dougherty, Kathleen" <DoughertyK@excen.library.phila.gov>, "Peterman, Jacques" <PetermanJ@excen.library.phila.gov>
Subject: FAR Case 2002-011

On behalf of the Free Library of Philadelphia, I urge you to review Memorandum M-02-07 from Budget Director Mitchell E. Daniels Jr., calling for amendments to the Federal Acquisition Regulations (FAR) to allow agencies to procure their printing outside of the Government Printing Office (GPO). This is done in the name of saving money; however, we believe this to be false economy.

What these amendments fail to address is the important role of the Federal Depository Library Program (FDLP). Nearly 1,350 depository libraries across the country give free and open access to the publications of the federal government; these publications are provided at no charge by the GPO.

The Free Library of Philadelphia is proud to have been a part of this program since 1897, serving the citizens of the Delaware Valley and the State of Pennsylvania. Our Government Publications Department uses an array of GPO materials to answer approximately 3,500 reference questions a month! Any disruption in the distribution of materials from the GPO will have a serious impact on our ability to deliver quality public service.

Because distribution of the depository program's materials is centralized at the GPO, we believe that implementation of these amendments will have serious consequences for the FDLP. The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the Superintendent of Documents for distribution to depository libraries. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

Please take a very close look at these problematic amendments to the FAR. Thank you for your consideration and support of the Federal Depository Library Program.

Sincerely,

Elliot L. Shelkrot
President and Director

Elliot L. Shelkrot, President & Director
Free Library of Philadelphia
1901 Vine Street
Philadelphia, PA 19103
(215) 686-5300 - Phone



"Peter Menning"
<adricm@juno.com>
12/13/2002 01:17 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1 334

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

A GOVERNMENT shrouded in secrecy makes us no better than the failed soviet union, i love my country, and want it to be all that our fourfathers freamed of and more, please education and information are our best assets!! keep them alive!

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Peter Menning
1902 gold se
Albuquerque, NM 87106
USA



"Chris Adams"
<eff@improbable.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 01:22 PM

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

1 335

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Sincerely,

Chris Adams
6448 Bell Bluff
San Diego, CA 92119
USA



"Leah
Sandwell-Weiss"
<leah.sandwell-weiss
@law.arizona.edu>

12/13/2002 01:33 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: Comments to FAR Case 2002-011

1336

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

I am concerned about this issue because I am a law librarian. Our patrons, law faculty and students, attorneys, paralegals, and members of the public, depend on libraries having ready access to Federal information. The proposed amendments to the FAR would make federal information much less accessible in libraries and elsewhere.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents; decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

There are several legal as well as practical problems with these amendments.

The proposed amendments authorize agencies to procure their printing outside of GPO, a clear violation of 44 U.S.C. §501.

In addition to violating 44 U.S.C. §501, the proposed changes to the FAR violate other Title 44 provisions that neither OMB nor the Department of Justice have ever challenged as unconstitutional:

* §1903 that requires agencies who procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The proposed FAR change that the Superintendent of Documents (SuDocs) would bear these costs is contrary to current law.

* §1710 that requires agencies to supply a copy of all publications to the SuDocs for cataloging purposes. How this might be achieved on a comprehensive basis under the proposed FAR change is very unclear.

While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR amendments are so vague that the result will be more fugitive publications, not fewer. Today, the SuDocs, working with its professional library personnel, provides a strong, centralized, coordinated and managed Federal information dissemination and access program through the Federal Depository Library Program (FDLP).

A strong system of coordination, including an effective and transparent system to bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The proposed FAR change does not create such a system, choosing instead to leave a void in the place of the current effective structure.

The proposed changes to the FAR do not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency

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publications in all formats.

Today, the SuDocs is able to ride agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and members of the public depend on GPO's Sales Program to acquire print Government publications.

Law libraries especially depend on the Sales Program to purchase print Federal primary legal materials that may be provided to depository libraries only in an unofficial electronic version. The proposed amendments to the FAR do not adequately provide for a continued cost effective Sales Program.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, as GPO is already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, H.J. Res. 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Leah Sandwell-Weiss
Reference Librarian
Law Library, James E. Rogers College of Law
P.O. Box 210176
Tucson AZ 85721-0176
(520) 621-3140
leah.sandwell-weiss@law.arizona.edu
Leah's Law Library Weblog: <http://radio.weblogs.com/0109773>



"Ben Hengst"
<hengst.1@osu.edu>
12/13/2002 01:49 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1337

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Ben Hengst
1525 S High St
Columbus, OH 43207
USA



"Westwood, Karen"
<Karen.Westwood@courts.state.mn.us>

12/13/2002 02:02 PM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: FAR Case 2002-011

1338

I am writing to express strong opposition to the proposed amendments to the Federal Acquisition Rules that would allow agencies to procure their own printing outside of GPO. I am employed by the Minnesota State Law Library and can speak from my experience at the Reference Desk to the importance of the Federal Government providing equitable, effective, no-fee, efficient and dependable access to and dissemination of Government information in permanent and readily accessible formats.

The Minnesota State Law Library takes seriously our role as a partial government depository and we make every effort to make government documents as accessible as possible. Our patrons make heavy use of government publications. As private publishers continue to raise prices at an alarming rate, we rely more than ever on government information to help our patrons understand the workings of our democracy.

Of particular concern to law libraries is that the proposed amendments are a clear violation of 44 U.S.C. 501 since they authorize agencies to procure their printing outside of GPO; the amendments would violate 44 U.S.C. 1903 that requires agencies who procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries; and would violate 44 U.S.C. 1710 that requires agencies to supply a copy of all publications to the SuDocs for cataloging purposes.

I am afraid that if the proposed amendments are adopted, our ability to serve our clientele will be compromised. Our patrons include the Minnesota Court system, as well as law firm libraries, public libraries, public patrons and students. Our Federal Depository Status is something we are proud of here at the Minnesota State Law Library - please be aware of the harmful impact these proposed changes could have on our patrons and on citizens using libraries throughout the country.

Karen Westwood
Head of Public Services
Minnesota State Law Library
25 Rev. Dr. Martin Luther King Blvd.
St. Paul, MN 55155
651-297-2087
karen.westwood@courts.state.mn.us



"Greg Goddard"
<ggoddard@ufl.edu>
12/13/2002 02:09 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1339

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Greg Goddard
1001 SW 16th Avenue #86
Gainesville, FL 32601
USA



National Archives and Records Administration

8601 Adelphi Road
College Park, Maryland 20740-6001

1340

December 13, 2002

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

Dear Ms. Duarte,

Thank you for the opportunity to comment on the proposed rule concerning the Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office.

NARA agrees that effective dissemination of Government information is a cornerstone of citizen-centric Government and that steps need to be taken to ensure effective distribution of publications to the Federal Depository Library Program (FDLP). While we are not able to speak to the specifics of the proposed rule, the National Archives and Records Administration praises the intent to preserve the Federal Depository Library Program.

Lori A. Lisowski
Director
Policy and Communication Staff

Handwritten note: 11/14/02 10:26:02

Interagency Council on Printing and Publications Services
Washington, DC

December 13, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW; Room 4305
ATTN: Laurie Duarte
Washington, DC 20405

1341

In reference to the Proposed Rule – Federal Acquisition Regulation; Procurement of Printing and Duplicating through the Government Printing Office, the Interagency Council on Printing and Publications Services¹ (ICPPS) would like to offer the attached Implementation Impact Report.

Thank you for the opportunity to comment on these proposed changes. Please feel free to contact us if you have any questions or need further information.

Randall Bacon, Chair ICPPS
Printing Officer
U.S. Environmental Protection Agency
202-564-9646
bacon.randy@epa.gov

Carolyn Hunt, Co-Chair ICPPS
Printing Officer
Social Security Administration
410-965-1340
carolyn.hunt@ssa.gov

¹ The Interagency Council on Printing and Publication Services consists of Executive Branch representatives from each department's Central Printing Procurement Management Organization.

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Implementation Impact Report

Proposed Rule – Federal Acquisition
Regulation
Procurement of Printing and Duplicating
through the
Government Printing Office

Submitted by
Interagency Council on Printing and Publication Services

General Comments

OMB states the reason for changing the FAR regarding procurement of printing is to “open competition”, “save money”, and provide greater opportunities for small businesses. We believe that by enacting OMB’s proposal, the government will end up spending more on printing than it currently does. The public will have far less access to documents they are entitled to, competition will actually be restricted, and any semblance of consistency in presentation of information, formats, styles, cost efficiencies, will be lost. The ultimate customer – the taxpayer – will end up paying more and getting less. The current system does need upgrading to ensure government customers are getting the best value printing services. However, we propose that the current GPO system can be enhanced to accommodate this need.

OMB also stated that there are a multitude of complaints regarding GPO’s services. On the whole, ICPPS believes GPO provides excellent service. OMB had difficulty finding any customers to testify in support of their proposal at the hearings before the Joint Committee on Printing during the summer of 2002. Regardless of the system used, there will always be some problems. That is reason to upgrade and enhance a system, not dismantle it in its entirety and replace it with something more expensive and less responsible.

GPO currently sends out approximately 80% of the printing requests for open competitive bids. The competition is open and especially considerate of the small business vendor. We do not see that these proposed changes will enhance the opportunities for small business. Currently the vendors come to one source, the GPO listing, to find opportunities to bid on and will not be dealing with multiple department bid processes under the proposed change.

2. Procurement of Printing and Related Supplies.

a. Freedom to Choose Among Different Printing Sources

The basic argument that inspired this effort is the professed unconstitutionality of Title 44 demanding that Executive Branch entities procure printing services through the Government Printing Office on the basis of the separation of the legislative and executive branches. The question therefore becomes, does that principle alone justify the transfer of responsibilities from a professional Government entity committed to producing Government information products for the whole and reinstating or duplicating the processes in agencies and the General Services Administration? We maintain that it should not matter when both the public and the Government as a whole are served through a central body dedicated to produce and disseminate Government information. Aside from department requirements, the GPO produces the Federal Register, Code of Federal Regulations, and the like for the Government and its entities. Whether

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the procuring office is GPO or department should not be an issue. The fact remains that GPO can facilitate printing requirements and attend to agency/department needs far better than department procurement offices, particularly since department procurement responsibilities are already stretched with their current workload demands without having to assume printing responsibilities. Further, GPO could modify its procedures to meet certain specifications as outlined in the proposed rule.

We support the premise that "Executive Branch departments and agencies should select printing and duplicating services based upon the best quality, cost, and time of delivery." We believe though that the GPO based on their established and proven expertise, would meet these attributes and should be the primary source available to agencies to procure printing services. Several departments have suggested that *some flexibility* for limited direct procurement for items of small dollar amounts and procurements with urgent delivery requirements be allowed. However, the majority of their work would continue to be submitted to GPO for competitive bids.

b. Limited use of in-house or other Executive Branch printing operations.

The proposal calls for limiting use of current Executive Branch printing operations under the assumption they are inherently less cost-effective than commercial sources. Historically the in-house operations have been chartered specifically to produce work that cannot be procured commercially due to constraining circumstances, such as sensitivity of work or critical production timeframes. Even within these constraints the production parameters are limited regarding run lengths and color work.

Even if agencies are not going to be required to procure their printing through GPO, these mitigating circumstances will still necessitate the existence of some in-house operations. Due to these historic production constraints, in-house facilities are at a distinct disadvantage when cost comparisons are done with the private sector that do not operate under the same constraints. Therefore, in-house facilities should be permitted to improve their cost efficiencies of in-house production by being able to increase run lengths and upgrade their processes to ensure the most cost effective processes and equipment are employed. As the majority of production costs are incurred in the initial job setup and makeready, longer run lengths result in lower unit costs.

The use of in-house operations should be based on the same principal of best value that is being sought in the proposed regulations change. A department should be able to utilize their in-house operations when it is demonstrated that they offer the best combination of price and service. It should not be strictly a lowest cost decision. That is precisely what these proposed regulations are trying to move away from, to base the decision on best value. An in-house

facility should not be prohibited from upgrading or expanding its equipment and operations if they continue to show best value, i.e. their costs are demonstrated through benchmarking to be competitively priced and provide best value to the customer.

c. Use of Competition to Open Opportunities

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To further ensure “best quality, cost, and time of delivery,” while not presuming to speak for GPO, it would seem practical that GPO could advertise Executive agencies’ work via FedBizOpps as well as their master bidders list, providing opportunities to approximately 12,000 printers, with substantial work (70 percent in fiscal year 2001) going to small businesses. This would meet what OMB is seeking without having to dismantle an established system.

The proposed rule contends that agencies should have the “freedom” to select printing sources. This “freedom” however, would challenge department components to exercise due care in planning their printing needs as their printing requirements would need to be submitted to the same office that procures their other materials in excess of \$2500 and therefore, are subjected to a “first come, first served” basis. A printing need does not always translate to what a procurement specialist would classify as an “unusual and compelling urgency.” Furthermore, the requirement to advertise in FedBizOpps would extend the time of delivery, tying up a printing procurement for an unspecified period of time.

Today, agencies have the “freedom” to refer jobs to GPO at their pace and know that generally their expected delivery date will be met. Moreover, department offices have the latitude, regardless of cost, to refer printing jobs to GPO from the originator level. That is to say, the originator of such jobs does not have to be a procurement specialist or a contracting officer with a designated procurement office. The job can be taken directly to any GPO office by the appropriate printing specialist, administrative officer, support employee, or even an office secretary, depending upon the structure of the organization. Under the proposed rule, such work in excess of \$2500 would have to be referred to department procurement offices, thereby compounding the already existing heavy workload and extending a reasonable delivery timeframe. This beneficial attribute for using GPO should qualify the department to be the better avenue to attend to delivery schedules.

Customers laud GPO for resolving printing problems on their behalf, and believe the surcharge is worth having GPO perform printing responsibilities on their behalf rather than having to assume those responsibilities themselves. Customers have experienced difficulties with printers and GPO has intervened and recovered costs. In addition, referring printing work to GPO, frees up procurement specialists and field warranted officials to attend to other workloads, while being assured that all contractual particulars in printing are being handled by a competent and experienced Government department. The GPO has the

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expertise and commands the respect within the printing industry to deal with various printers and is equipped to challenge shortcomings that may materialize within a job. Consequently, department procurement specialists do not possess this expertise and could be vulnerable to being subjected to some incomplete or substandard work.

The GPO's expertise saves money for the Government. Printing is not like buying a fixed price item. No job is the same in content or cost. Customers without printing expertise must have the means to verify that printers are producing the most economical and quality product for them. As the Government's agent, GPO has interceded on their clients' behalf and produced savings that would have otherwise cost the Government more if the clients had contracted directly with the printer. Examples of such outcomes are expressed in the Public Printer's testimony as follows:

- Changing the paper stock that was chosen by the client saved the Government \$17,350 from the original estimate with the non-stock paper.
- GPO successfully outbid two local copy shops on a quick-turnaround job that saved the Government \$3,834.
- A 3 million copy job was split into two jobs and bid out to two printers GPO deemed to be best suited to do the work and saved the Government \$68,309.

The proposed rule stipulates that when GSA creates multiple award schedules (MAS), all orders exceeding \$2500 would be advertised via GSA Advantage. Presumably, there would be an electronic form specially designed for print orders that a procurement specialist would prepare detailing all of the specifications. Also, MAS as in place today, has national application whereby vendors are typically nationally based. This would not encourage small business participation, unless the MAS are issued by metropolitan or citywide areas.

The proposed restriction to limit the contract term to one year is needlessly restrictive, inefficient and will not meet the business needs of Federal departments. The great majority of department workloads are the result of court decisions with appeal rights or legislatively driven which require daily or weekly written communication with the American public regarding decisions, benefits, etc.

To effectively administer these printing contracts, departments are faced with long start-up timelines on contracts that have daily production requirements. These start-up timelines require the contractor and/or the Federal department to perform lengthy and extensive programming and testing. Where daily or weekly contractor production is required, a transmission line must be installed from the

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Federal department to the contractor site, which can take from 6 to 8 months for the installation and line testing before live production can begin.

We believe that as long as contractors have the opportunity to compete for the original contract, it does not seem cost effective to limit the duration to one year. We recommend the term of the contract to be one base year with optional extension years not to exceed five years.

d. New Opportunities for Small Business

Although GSA would be the principal body to produce procurement vehicles for printing, the proposal does not take into account that with this "liberation," other Government mandated sources such as the National Industries for the Blind under the Javits-Wagner-O'Day Act (JWOD) would likely emerge more prominently and compete or rather impose that they are mandatory sources that cannot be ignored in fulfilling certain Government printing needs. The Federal Prison Industries (UNICOR) likewise performs printing services. Refuting the mandate of Title 44 to procure printing through GPO could serve to mobilize these mandatory sources to proclaim themselves as "first sources" if they are providing these services. Procurement offices customarily recognize and accord these entities to be primary and mandatory sources for commodities they provide. Therefore, to streamline the procurement process for printing, these entities could be assigned work within a certain threshold, for example \$2500 to \$10,000, irrespective of the competitive desires being sought in this proposal. Or does the FAR Council aim to require that these mandated sources likewise compete? If so, wouldn't that dilute these sanctioned sources' mandatory status for other commodities they offer? Effecting this proposal to essentially rid GPO as being the prime source of Government printing will upset a stable environment; instigate strife among competing forces; and set off duplicative and costly efforts throughout Government.

3. Information Distribution.

It is not clear as to which method will be observed regarding ensuring how the depository library requirements will be fulfilled. The rule stipulates that the FAR Council is considering a clause to be added to contracts requiring the contractor to send a copy of the job to the Superintendent of Documents (SuDocs). Under **8.801 Policy**, it specifically calls for agencies to provide a copy of the document via electronic means and that GPO could produce as many copies as necessary for the library distribution. One would question the efficiency and cost-effectiveness of two Government agencies producing the same publication, one to satisfy department mission needs and the other for the prescribed Government cataloguing and for providing the public with free access to Government information. The taxpayer is paying twice for the sake of separation of powers.

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Furthermore, the Government cataloguing requirement would suggest that the SuDocs library identification number likewise appear on the publication being published by a private printer. It is a Government publication and GPO is the source for the public to purchase hardcopy versions of printed material found in the depository libraries. Accordingly, this would require advance notification of an department's intention to publish to SuDocs, whereas SuDocs requires specific information, such as whether the document has been previously catalogued, the intended audience, etc. That notification is today performed on GPO Form 3868, submitted electronically at http://www.access.gpo.gov/sudocs/forms/3868/form_3868.html. If we are to observe those instructions, then it would seem that the responsibility for providing the electronic file of this job would fall on the contracting officer and not the printer. Also, should SuDocs respond accordingly that it desires to ride the requisition, which would be the most cost-effective way, how should the SuDocs requirements be specified on the order and who pays for the additional copies? Ordinarily, a contract or purchase order shows a single fund citation. Would this require agencies to seek reimbursement from GPO? The rule also does not address printing requirements under \$2500, which contribute to the "fugitive" documents problem as well, and which would be difficult to monitor or ensure compliance to notify SuDocs. Currently, GPO pays for the SuDocs copies for all work produced through them.

Antideficiency Act

The legal effect relating to the use of appropriated funds to implement or comply with this regulation imposes a high level of concern with procurement and certifying officials. The proposed FAR requirements are contrary to Section 117 of Public Law 107-229 which establishes that an department that obligates funds to acquire printing from some source other than the Government Printing Office would violate the Antideficiency Act. To avoid any personal liability as stated in the Antideficiency Act, the proposed FAR language and Section 117 of the Public Law should comply. Does a statutory appropriation overrule a regulation?

Rider Rate Program

The rider rate program, that was established many years ago by GPO, ensured that federal agencies were able to obtain publications and documents that are generated by other federal agencies at a greatly reduced cost to those agencies. GPO would collect the printing information regarding federal publications and inform the agencies throughout the government that these publications would be printed and allow the agencies to sign up for the number necessary to fulfill their requirements for that particular document. The rates were decided based upon the total print order, and typically might run in the \$3.00-\$15.00 range for a one time ride. Agencies were also allowed to sign up for open requisitions, which allowed the agencies to ride for federal documents that are printed on a continuous basis throughout the year. The FAR will basically eliminate this

1341

program and force federal agencies to buy the documents from commercial vendors such as Amazon or the GPO bookstore. If and when this FAR is implemented the cost to print rider type publications will increase. Examples of the increases are:

- 1) The U.S. Code on CD-ROM, which cost \$15.00 in the rider program will cost \$ 37.00 at the GPO bookstore.
- 2) The U.S. Government Manual, which cost \$15.00 in the rider program, will cost the federal agencies \$49.00 at Amazon and the GPO bookstore and;
- 3) The Statistical Abstract of the U.S., which is \$10.00 on the rider, will cost \$ 38.00 at Amazon and the GPO bookstore.

The above publications are just a few of the many riders that are published each year. Future publications would be subject to increased production costs that will prove to be an added burden of the departments operating budgets.

Summary

In summary, we believe that GPO should be the primary source of “best quality, cost, and time of delivery” for Federal Government printing as follows.

- *Best Quality* is assured by GPO's Quality Assurance Through Attributes Program (QATAP), which ensures that contractors adhere to established printing standards and quality levels in producing work for the Government. “Best Quality” can also apply to the better approach in assuring that the depository library requirements are fulfilled via GPO, whereas this requirement is not laid upon the agencies to fulfill.
- *Best Cost* is attained by GPO's ability to negotiate pricing with industry, *irrespective of the surcharge that is added to the contract costs.* Customers feel that the significance of the surcharge is lessened by the negotiated prices, and that the fee is worth the service of having the foremost expert for printing in the Federal Government provide printing service for them and acting on their behalf in resolution of any dispute.
- *Best Time of Delivery* is best attained by GPO as requirements can be presented to GPO directly whereas department procurement offices' workloads are not increased by the printing requirements. Further, GPO term contracts and their simplified purchase agreements (SPA) can quickly satisfy department requirements without undue complications.

Consequently, we support the continuation of GPO being the primary source for *Government printing.*



sharman@mlc.lib.ms.u
s
12/13/2002 12:40 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1342

The attached WORD document contains the comments of the Mississippi Library Commission related to Federal Acquisitions Regulations (FAR) Case 2002-011 which includes the Office of Management and Budget's (OMB) proposed amendments allowing federal agencies to procure printing outside the Government Printing Office (GPO).

Please carefully consider the long- and short-term ramifications of these proposed changes on citizen access to government information before approving these amendments.

Sharman Bridges Smith
Executive Director
Mississippi Library Commission
1221 Ellis Avenue
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(See attached file: FAR Case 2002-011.doc) FAR Case 2002-011.do

December 13, 2002

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RE: FAR Case 2002-011

I am writing to express the Mississippi Library Commission's deep concern about the Office of Management and Budget's (OMB) proposed amendments to the Federal Acquisitions Regulations (FAR) to allow agencies to procure printing outside the Government Printing Office (GPO). This move is alarming and in clear contradiction to the *United States Code (USC)*, Title 44, Section 501. In addition to being legally questionable, the amendments raise a number of issues that have not been addressed.

1. The assertion of the FAR proposal that the Superintendent of Documents (SuDocs) would bear the cost of printing and binding the necessary copies for federal depository libraries and federal agencies who procure outside of GPO is contrary to current law. Section 1903 of the *USC* requires agencies who procure outside of GPO to bear the cost of printing and binding the necessary copies for depository libraries.
2. Section 1710 of the *USC* requires agencies to supply a copy of all publications to the SuDoc for cataloging purposes. It is unclear how this will be achieved under the FAR proposal. This will contribute to the proliferation of fugitive documents and further compound the problem while offering no solution.
3. Other issues that will be impacted by the FAR amendment includes:
 - significant cost increases in federal printing;
 - lost contracting opportunities by the small businesses that dominate the printing industry; and
 - reduced public access to government information through the Federal Depository Library Program (FDLP).

As the executive director of the state library agency, I am an advocate for timely comprehensive citizen access to federal government information through the Federal Depository Library Program (FDLP) which ensures that government publications are permanently accessible.

Sharman B. Smith
Executive Director

December 13, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW; Room 4305
ATTN: Laurie Duarte
Washington, DC 20405

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In reference to the Proposed Rule - Federal Acquisition Regulation; Procurement of Printing and Duplicating through the Government Printing Office, I would like to offer the following comments.

Office of Management and Budget (OMB) memorandum M-02-07 stated OMB's desire for Executive Branch departments to procure their printing and duplicating needs from sources other than the Government Printing Office (GPO). The intent of this memorandum is to "liberate its [Executive Branch] agencies from a monopoly that unfairly penalizes both taxpayers and efficient would-be competitors" by eliminating the GPO surcharge and increasing competition among small business printers. It is my belief that if these proposed rules are implemented, actual costs for printing will increase rather than decrease and may not achieve the intended goal of increased competition.

Additional resources (FTE's, training of personnel, etc.) would be required in the implementation of these changes. Development of quality assurance attributes programs, quality inspections, facility site visits and processing of contract compliance issues will further add to the additional resources that will be required. The agencies will essentially duplicate, a set of services that is now provided by one entity. It is anticipated that for my agency that an addition 8-15 FTE's would be required to implement and administer these FAR changes. The cost of salaries alone for these additional FTE's exceed the total dollar amount that an Agency was charged by GPO for its printing procurement services.

The GPO currently has a database of approximately 12,000 nationwide vendors that receive bids on Executive Branch publications. It is unlikely that we would be able to begin to duplicate this vast network of printers. It is likely that for jobs under \$2,500, only printers in their local area would be asked for bids and would not include many able printers outside of the local area. For those items over the \$2,500, bids must be secured through the FedBizOps website. This bidding process further adds to the administrative process.

Printing schedules will increase due to the "newness" of the proposed system. The departments and printers will need to adjust to a new procurement mechanism. Schedules may also increase if there is not a uniform procurement mechanism from Agency to Agency. Many printers may decide not to provide bids if the process is

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varied from department to department.

The Government Printing Office, in most instances, provides the agencies an economical source for their printing and duplicating needs. When factoring in the additional resources required to implement the proposed changes, the GPO surcharges applied to each procurement is less in cost than the additional resources required for the implementation of these changes. The Government Printing Office has the vast expertise in outside procurement of printing and these proposed changes to the FAR will create duplicate "GPO's" within each department which will not provide the intended results. We support the continuation of GPO being the primary source for government printing with the option of direct printing procurement for those jobs under \$2,500.00. It seems the underlying issue is the constitutional issues raised several times through an opinion issued by the Department of Justice. This proposed change may resolve the constitutional issues, however, there will still be a conflict between the regulation and Title 44 U.S.C. Can a regulation supersede a statute? One solution to this issue would be to place the procurement portion of the GPO in the Executive Branch, either as a new Agency or merged with an existing Agency. This would maintain the centralized procurement of federal documents and satisfy the constitutional question.

Thank you for the opportunity to comment on these proposed changes. Attached are comments that have been received from other EPA locations on the proposed changes. Please feel free to contact us if you have any questions or need further information.

Randall Bacon
Printing Officer for an Executive Branch Agency
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"Hodges, Carol L."
<chodges@gpo.gov>
12/13/2002 12:53 PM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: FAR Case 2002-011

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The attached are the comments of the Government Printing Office, submitted in accordance with the requirements established in the Federal Register Notice of November 13, 2002, page 68914.
<<FAR Comments - final>>



FAR Comments - final.DC

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December 13, 2002

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

RE: Comments on proposed amendments in case 2002-011

Dear Ms. Duarte:

For more than 100 years, the United States Government Printing Office (GPO) has printed and provided public access to publications for all three branches of the Federal Government. GPO's statutory responsibility to discharge these essential functions has been challenged by the Office of Management and Budget (OMB). The November 13, 2002, proposed amendments contained in Federal Acquisition Regulation (FAR) case 2002-011, would strip GPO of its responsibility to print publications for the executive branch. They would implement the policy set forth in OMB Memorandum No. M-02-07, "Procurement of Printing and Duplicating through the GPO (May 3, 2002)." This proposed revision is without legal basis and in direct conflict with the laws governing Federal printing.

The FAR revision is based on a May 31, 1996, opinion written by former Assistant Attorney General Walter Dellinger, wherein he concluded that the current printing statutes are unconstitutional under the doctrine of separation of powers. Yet on two earlier occasions, September 13, 1993, and March 11, 1994, Mr. Dellinger opined that the current statutes requiring executive branch agencies to print through GPO *are not unconstitutional* and do not violate the separation of powers clause. The fact is that this issue has never been litigated and no constitutional process involving Congress or the courts has ever deemed the current printing statutes "unconstitutional."

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Congress has specifically rejected similar proposals before, in 1987 and 1994. The reasons are clear: analysis shows that establishing duplicative printing capability among thousands of executive branch entities will raise taxpayer costs for Government printing, jeopardize the ability of small business printers to win Government printing contracts, and impair public access to Government information through Federal depository libraries and associated Superintendent of Documents distribution programs. GPO has testified on these impacts before Congress; more detailed information on these impacts is included in the enclosure.

Consistent with prior action, Congress has enacted legislation that specifically prohibits the implementation of OMB's May 3, 2002, memorandum. The President has signed this legislation into law. The General Accounting Office (GAO) has concluded that the legal effect of the new prohibition is clear: it precludes the use of appropriated funds to implement or comply with the OMB directive. The GAO has also concluded that the use of appropriated funds to print or procure Federal publications other than by or through the GPO would violate the Antideficiency Act, resulting in certifying and disbursing officer liability.

Any changes to the FAR that ignore existing statutes in favor of a mere agency opinion should be viewed with the utmost diligence and legal responsibility. As Federal employees, each of us has a solemn obligation to ensure that our Nation's laws are faithfully executed. As Walter Dellinger himself once said:

When the President's obligation to execute laws enacted by Congress is in tension with his responsibility to act in accordance with the Constitution, questions arise that really go to the very heart of the system. And the President can decline to comply with the law, in our view, only where there is a judgment that the Supreme Court has resolved the issue.

Newly-confirmed Public Printer Bruce R. James believes that the real issue facing the GPO, OMB, Congress, Federal agencies, and the public is the construction of a new framework for dealing with Federal information in the 21st century. Rather than making significant and potentially injurious changes to the established system of Government printing, a system rooted in a technological era that is passing by, he has suggested that the stakeholders in this system should instead work together to develop beneficial and lasting changes, not just to printing policy, but to a Government information policy in general that is designed to meet both our current and future needs.

The Public Printer's direction is one in which we can work cooperatively with OMB and the other communities of interest in Federal printing and information policy. We respectfully ask the FAR Council to reconsider and withdraw the changes proposed in case 2002-011.

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Sincerely,

ANTHONY J. ZAGAMI
General Counsel

Enclosure

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Impact of the Proposed FAR Revision

The proposed FAR revision will lead to significantly increased costs for Government printing.

- The claim that agencies will save \$50 - \$70 million if they are not required to use GPO has not been substantiated. In FY 2001, GPO generated total printing procurement surcharge revenues of only \$32.5 million.
- As the result of decentralizing Government printing, the proposed FAR revision would increase printing costs, based on the findings of previous studies.¹
- GPO paid \$415 million for procured printing in FY 2001. If agencies decide to procure work themselves from the private sector, annual executive branch printing costs could increase by 25%, or \$103.8 million. The increased costs would result from:

Duplication of effort – GPO serves Federal printing needs at approximately 6,300 billing address codes. For each one of these operations to devote just one-tenth of an FTE to printing procurement would require 630 FTE's. GPO has about 330 FTE's devoted to printing procurement nationwide.

Loss of specialization – It would cost the Government more for each agency to provide the same comprehensive range of procurement services that GPO offers in support of printing procurement (setting print specifications, administering printing contracts, ensuring competition, monitoring quality and resolving quality problems, ensuring fulfillment of statutory distribution requirements, providing voucher exam and payment services, providing legal advice, resolving contract disputes, etc.).

Reduced competition - More than 16,000 private sector printers are on GPO's Master Bid List, representing about 40% of the establishments in the printing industry. Agencies are not likely to maintain the same universe of competition, resulting in increased prices.

¹ GAO, Agency Printing Plants--Choosing the Least Costly Option, PLRD-81-31 (June 19, 1981); OTA, Informing the Nation: Federal Information Dissemination in an Electronic Age, (October 1988); JCP, Oversight Hearing on Consolidation of Department of Defense Printing Services, S. Hrg. 102-907 (August 4, 1992); JCP, Review of the Defense Printing Service, S. Hrg. 103-266 (July 15, 1993); various reports of the GPO Contractors Coalition, 1993-94; letter from Neil J. Stillman, Deputy Assistant Secretary for Information Resources Management, HHS, to Sally Katzen, Administrator, Office of Information and Regulatory Affairs, OMB, August 12, 1997; letter from Thomas J. Muldoon, Acting Inspector General, GPO, to Joseph J. Green, Assistant IG for Public Health Service Audits, HHS, September 24, 1997; Harold C. Relyea, "Public Printing Reform: Issues and Actions," Congressional Research Service, Report for Congress, 98-687 GOV (updated May 10, 2002), p. 19.

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Greater burdens on contractors - Without one-stop shopping for all printing contracts through GPO (agencies will only be required to advertise for printing contracts worth more than \$2,500), printing contractors would have additional sales and paperwork costs, also driving up prices.

- If agencies take the printing they are currently procuring through GPO and produce it in their own printing and duplicating plants, annual executive branch printing costs could increase by as much as 50%, or \$207.5 million. Federal in-plant operations are generally far less efficient than private sector plants. The proposed FAR revision establishes no effective mechanism for monitoring the “full cost comparisons” required to justify in-plant printing and duplicating by agencies.
- Other impacts from the proposed FAR revision would include the loss of central responsibility for applying uniform standards of print quality and for monitoring application of statutory requirements for the use of recycled paper, alkaline and permanent papers, and vegetable oil-based printing inks. GPO’s in-plant production capability supporting congressional printing requirements would also be impacted.

The proposed FAR revision will injure small business printers.

- The printing industry is predominately made up of small businesses, and GPO deals extensively with small business printers in buying printing. More than 70% of the 16,000 printers on GPO’s List are small businesses. In FY 2001, GPO procured about 148,000 printing jobs. Small businesses received 77% of the contracts awarded. This compares with a 22.7% small business share of Federal prime contracts during the same period, as shown in the Small Business Administration’s Performance and Accountability Report for FY 2001.
- Small business printers will be injured under the proposed FAR revision as the result of:

Loss of access to jobs under \$2,500 – The proposed FAR revision will require public posting and competitive sourcing for all jobs valued at more than \$2,500. More than 80% of all printing orders procured by GPO are valued at \$2,500 or less. As a result, much of this work would simply be lost to small business printers as the result of non-competitive credit card purchases.

New competition from NAFTA trade partners -- Under executive branch procurement rules, printing jobs valued at more than \$25,000 would be subjected to competition from NAFTA trading

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partners. Contracts made available under GPO's Printing Procurement Regulation are subject to the provisions of the Buy America Act.

Increased paperwork burdens - GPO's one-stop-shopping also features standardized forms and procedures, and ensures the uniform application of Federal rules requiring the use of vegetable oil-based inks, recycled paper, and alkaline and permanent papers. With the dissolution of standardized procedures under the proposed FAR revision, small printers would be burdened with more paperwork and the disparate application of rules and regulations.

Decreased contracting opportunities resulting from in-plant production - Agencies that hold work for production in their own printing and duplicating facilities will reduce competitive contracting opportunities for small printers.

- With reduced opportunities for winning contracts and the resultant loss of businesses and jobs among small business printers, there would also be a loss of tax revenues and increased costs for unemployment and related services.

The proposed FAR revision will impair public access to Government information.

- The link between the production and distribution of Government documents in GPO is the source of publications for GPO's Federal Depository Library Program (FDLP), as well as GPO's cataloging and indexing program, statutory distribution program, sales, and international exchange program. Even *GPO Access* uses the system to monitor for new publications.
- Publications that belong in the FDLP and related programs but are not included are called "fugitive documents." Previous estimates have placed the rate of fugitive documents in the neighborhood of 50%, which corresponds roughly to the amount of Federal printing that GPO estimates does not come through GPO. *A primary cause of "fugitive documents" is agencies that do not print through GPO.*
- There is still a substantial amount of Government information for which no reliable online alternative exists, and problems with ensuring permanence and other issues are still present for many online products. In FY 2001, GPO distributed a total of 5.9 million copies of approximately 14,700 tangible (print, microfiche, CD-ROM) titles from all three branches of the Government to depository libraries.

- To supply GPO's distribution programs, the proposed FAR revision would require that GPO either purchase additional copies from the originating agency or printing contractor, go "back to press" using a single copy supplied by the agency, or use a copy supplied by "electronic means" as the basis for producing an additional print run. This proposal is defective for the following reasons:

It violates current law -- 44 U.S. Code 1903 states that "[t]he cost of printing and binding those publications distributed to depository libraries obtained elsewhere than from the Government Printing Office, shall be borne by the components of Government responsible for their issuance..."

It will generate increased costs – Going back to press for distribution copies is more expensive to the Government than obtaining the necessary number of copies prior to printing.

Agencies historically are unreliable in their cooperation with distribution requirements – In a 1998 review of the National Institutes of Health printing program by the Department of Health and Human Services Inspector General, 77 percent of the publications which were produced outside GPO, but which should have been sent to GPO for the FDLP, were not provided to GPO for depository library distribution.

There is no assurance of standardization in print files – Files could be in proprietary page description languages. They may not be in formats that could be readily disseminated via the Internet for search and retrieval in lieu of printing. These factors could lead to delays in making information accessible, and raise additional issues regarding authentication, exact replication, and the official nature of the reproduced versions.

- Breaking the production/distribution link in GPO would also cost the public the convenience of buying their own copies of Government publications, which they currently enjoy through GPO's sales program.



"Jason Hill"
<jhill-eff@weblinc.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 11:45 AM

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December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Jason Hill
705 S 4th St
Philadelphia, PA 19147
USA



"Steve Smieshek"
<SteveS@threesaintsbay.com>

To: farcase.2002-011@gsa.gov
cc: cathy@csa-dc.org
Subject: Support Federal Printing Reform

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12/13/2002 01:05 PM

Three Saints Bay LLC is an Alaska Native Corporation with subsidiaries in the lower 48 states. As a member of the government contracting community in the Small Business arena, we aggressively seek government contracts and would like to have the ability to participate in competition.

The proposed rule seeks to encourage competition, save taxpayer money and promote small business opportunities by eliminating restrictions that mandate the use of GPO as a single source and frees agencies to select printing from a wide array of sources that can demonstrate their ability to meet the government's needs more effectively.

The government should rely upon the private sector to provide goods and services necessary for the operation and management of federal agencies and departments. Outsourcing reduces the size of government and increases efficiency by limiting government to performing its core mission functions.

While GPO does currently contract a portion of the government's printing to the private sector, greater savings can be achieved by giving federal agencies explicit authority to obtain the best value it can for taxpayer dollars. Therefore, we support the proposed GPO reform.

Please contact me directly for any further comments.

Steve Smieshek
Vice President of Operations



THREE SAINTS BAY Three Saints Bay LLC

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FREDERIC G. ANTOUN, JR.

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December 13, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, N.W., Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

RE: Comments on FAR Case 2002-001

For the past 15 years I have been actively engaged in providing advice and assistance to hundreds of printers, a printing trade association, government contractors, and federal departments and agencies. I have also attempted to provide information, advice, and assistance to OMB staff as it attempts to modernize and reform the federal print procurement system.

As an attorney, I am keenly aware of the legal dispute regarding the constitutionality and enforceability of 44 U.S.C. 501. While that issue may ultimately affect the way in which executive branch agencies meet their printing needs, no comments by my office or anyone else can resolve that dispute. Therefore, my comments address only issues that I believe relate directly to the efficiency and effectiveness of the proposed FAR regulation.

While there are a number of minor issues that could be addressed, including the need for an integrated, virtually centralized electronic procurement system, I have confined my comments to major areas that I believe should be addressed in order to provide an effective and fair print procurement system. Those comments are attached.

My attached revised comments are submitted on my behalf; not on behalf of, for, or with the approval of any present or past legal or consulting client. I believe that the information is both accurate and objective.

Sincerely,



Frederic G. Antoun, Jr.

FGA/mhw

Attachment: Comments on FAR Case 2002-001

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Comments on Proposed FAR Regulation [FAR Case 2002-011]

Submitted by:

Frederic G. Antoun Jr. Esquire
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717-261-0998

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1. There is universally strong support for a transition to best value type awards in the purchase of Federal Government print.

Printers want consideration of good quality, service, and on-time delivery. Agencies want the best value for the taxpayer's dollars. Even GPO, admittedly as a result of OMB Memo M-02-07, is working with its agency customers and vendors to develop best value type award criteria that can take advantage of its decades of detailed printer performance data.

2. The proposed rule's requirement that agencies provide the Superintendent of Documents with government publications is a historic change that will benefit the libraries and the public.

In order to provide improved access to government information to library and information community, Congress, and the public, the proposed FAR provides, for the first time in an executive branch regulation, that all government agencies must furnish a copy of all government publications to the Superintendent of Documents (SuDocs). The SuDocs then handles distribution to the 1300 depository libraries throughout the country, and to GPO bookstores, and mounts the publication/information on the GPO's public access website. This new rule should dramatically reduce the current high number of "fugitive" government documents (those that are not sent to the SuDocs) and significantly enhance public access.

The proposal also provides a mechanism for SuDocs to "ride" agency print orders by adding its order for depository library and distribution copies of government publications to agency print contracts with private sector printers.

3. The proposed regulations should clearly distinguish between agency's use of GPO as a private sector print procurement agent and GPO's role as a printer that actually produces printed products.

GPO has, by statute, historically filled two separate and very different roles:

a. GPO, the "Government Printer," operates a large printing plant in Washington, D.C., whereat it produces not only work for the U.S. Congress, but also Executive Branch agencies;

b. GPO acts as a buying agent for Executive Branch agencies, contracting out their printing needs to the private sector.

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Over the last two decades, GPO's role as a private sector buying agent for Executive Branch agencies has increased. Today, GPO buys between 75% and 80% of Executive Branch printing directly from the private sector, after publication of all job opportunities, and opened competition.

These two roles are separate and distinct, but they seem to be treated together in the FAR regulation.

My understanding of the intent of the FAR regulation, based on Director Daniels and OMB staff statements, is to allow GPO to continue to serve Executive Branch agencies as a buying agent that purchases printing for agencies from the private sector, so long as the agency determines that GPO is offering it the best combination of price, quality, and service for that service. Thus, use of GPO would become optional (as opposed to mandatory).

On the other hand, I understand that the intent of the FAR regulation with regard to actual print production by GPO is that, after January 2004, GPO will have to compete on a job-by-job basis with the private sector for printing GPO wishes to produce in its plant.

By blurring the distinction between these two services, the FAR regulation sets up an impossible situation for both private sector print contractors and Agencies. If GPO has to compete each job it wants to buy for the agencies as a broker, will the private sector printer have to submit two bids: one to GPO; and one directly to the agency? This is not only confusing, but also wasteful. If agencies determine that GPO offers them a better value in print procurement services from the private sector than they can obtain by duplicating those services in-house, will they be prevented from using GPO as their buying agent? Would such a system not be as restrictive and void of choice as the one it replaces?

Agencies should be given the latitude to use GPO as their print-buying agent if the agency determines that doing so provides the best procurement service, considering price, quality and service. Nothing should prevent the agency from establishing award requirements that its agent will apply on its behalf (best value type criteria and formulas, objective criteria, etc.).

On the other hand, if GPO wishes to produce the work in-house (not buy it from the private sector as a purchasing agent) then it should have to compete on each job beginning in 2004.

4. The posting period established for FedBizOpps is too long to adequately meet agencies' needs for printed products.

Over the years, the "turn around time" (the time between the issuance of the solicitation and shipping or delivery of the printed product) for printing jobs produced by the private sector for government agencies, whether through GPO or directly, has continuously shortened.

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Typical turn around times run between 3 and 10 days for jobs between \$10,000 and \$25,000; jobs under \$10,000 routinely have turn around times between 2 days and 5 days. Jobs under \$2,500 (80% of the number of jobs purchased from the private sector for agencies through the GPO) often require a quote to be submitted within 1 or 2 days. Statistics maintained by the leading government printing bid service, ABC Advisor's, Inc., show that 58% of the agency print jobs required quotes to be submitted within less than 2 business days of posting.

This shortening of not only the time to submit a quote, but also the time to obtain the product has been facilitated by two factors: 1) significant advances in printing technology; and 2) the proliferation over a number of decades of small, conveniently located printing businesses that are able to meet customer needs on what often seems like an impossibly short schedule.

Now that agency customers have become used to being able to obtain their printing almost on demand (hence the term, "print-on-demand"), there is no way to go back to the old days of leisurely bid or quote preparation and lengthy production/delivery cycles.

While the proposed regulation reduces the FedBizOpps publication level from \$25,000 to \$2,500, it does not shorten the 15 day time period provided by the FAR for posting of these job opportunities.

Unless this time period is reduced, the proposed system will not meet federal agencies' needs in today's fast moving environment.

From a logical view point, it seems only reasonable that since the job amount required to be posted for printing jobs is dramatically reduced by the new FAR in order to help small businesses, that the time a job is required to be posted for these printing jobs should likewise be dramatically reduced in order to meet the agencies' needs, and take advantages of the services that the small businesses have to offer.

The normal time between posting and "opening" of jobs under \$25,000 should be reduced to a minimum of 1 day. The normal time between posting and "opening" of jobs over \$25,000 should be reduced to 3 days. These time periods reflect the typical time periods agencies have become used to over the past decade.

5. A method for publicizing printing contract opportunities under \$2,500 should be established, in order to give small businesses access to this work.

For several decades, jobs under \$2,500 have made up over 75% of GPO's volume of orders from federal agencies. Last year, for example, the 117,785 orders procured from the private sector by GPO for federal agencies costing under \$2,500 constituted 80% of GPO's outsourced orders.

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Typically, large national and multi-national companies do not produce these low-dollar-volume, quick-turn-around jobs. Rather, they are produced by small printing shops located around the country.

In the last year, 77% of all GPO's outsourced print orders went to small businesses. This volume is very significant to small printers in the private sector.

One of the advantages of the GPO system for these small printing companies is that they can learn of the job opportunities through a private sector bid service that obtains the solicitations from GPO, sorts them according to the printer's capabilities, and provides the printer access via the web.

While the proposed FAR breaks new ground in lowering the dollar value threshold for publication on FedBizOpps to \$2,500 (from \$25,000), it does not address the small business need to easily access the many print job opportunities under \$2,500, in order to submit a quote.

Because of the small dollar value of these jobs and very short quote and production cycles, classic sales efforts and "opportunity discovery" efforts cannot be cost justified for small businesses. Rather, they need a system that will provide these opportunities to them – which has been provided by private sector bid services for more than 25 years. Under the GPO system, the private sector bid services obtain copies of solicitations from the GPO, then sort them and instantly deliver them to small businesses around the country. There is currently no similar system in place under the FAR proposal.

This problem could be addressed in several ways:

- a. The FAR could require that agencies that buy printing without going through GPO make copies of their solicitation available for sale (at cost) to private sector companies to distribute them to small printers (like the current solicitation subscription services operated by GPO (but see proposed FAR Case 2001-032); and/or
- b. The FAR could require that agencies that buy their own printing distribute the solicitation (not just a synopsis) on a private sector web-based portal, allowing small businesses approved by the buyer to access these job opportunities; or
- c. Send the job to GPO for open, competitive procurement.

Failure to address this problem will harm small businesses. It will also increase cost: the price on these 117,785 jobs under \$2,500 will increase substantially due to lack of competition. A recent study of government printing jobs shows a significant price increase without competition. http://www.printlaw.com/print_study.pdf

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6. Any applicable small business set-asides for orders between \$2,501 and \$100,000 should be waived for printing.

The vast majority of printing companies in the United States qualify as small businesses under current standards. Currently, 77% of government print orders going to the private sector are awarded to small businesses—even though the GPO has no small business set-aside. The small business disadvantage present in other industries is absent in the government printing market.

In the printing industry, orders between \$50,000 and \$100,000 are not considered small jobs. Since jobs in this dollar range can require complex and/or unique production capabilities, excluding large companies adversely affects the agencies' ability to obtain the best value. Given small business' obvious success at capturing the lion's share of this market, allowing large businesses to compete on an equal basis (as has been done for many years under the current system) will not harm small businesses.

7. Print-specific quality standards would significantly increase the new system's efficiency.

I have received many calls from printers who contract to produce work for federal agencies through the GPO (the current system) inquiring as to whether there will be universal standards under the new OMB-proposed agency print procurement system. Printers are concerned, as are some of their agency customers, that the longstanding quality system established in GPO's *Quality Assurance Through Attributes Program* will not be in effect under decentralized agency procurement, and that neither printers nor customers will know what quality or standards are expected on any given job.

Given the 130-year old GPO mandatory system, agencies have never had a need to adopt standards for print production or print products. Even buyers uneducated in print production standards could safely specify a job at one of the GPO's predefined quality levels (Level 4-utility through Level 1-best) to incorporate job quality and performance standards which would protect the agency, and let the printer know exactly what was expected.

I strongly encourage a review of GPO's Supplemental Specifications in *Contract Terms* and the *Quality Assurance Through Attributes Program*, to determine if, after revised as necessary, such standards could be incorporated into the FAR. Alternatively, OMB either through the FAR or through another management vehicle could encourage agencies to reference GPO's QATAP Standards (Level 4 through Level 1) when ordering print.

Of course, agencies could supplement or override standard quality requirements when they deem appropriate.



"Barbara Norelli"
<bnorelli@skidmore.ed
u>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

12/13/2002 11:02 AM

1348

Attn: Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street, N.W., Rm. 4035
Washington, D.C. 20405

Re: FAR Case 2002-011

I am writing to express my opposition to the printing and duplicating procurement changes set forth in the the Office of Management and Budget Memorandum No. M-02-07 on May 3, 2002. It is a serious mistake to adopt the Federal Acquisition Regulation Case 2002-011 amendments that will allow agencies to procure their own printing outside of the Government Printing Office (GPO).

Clearly the proposed FAR regulation is a violation of 44 U.S.C. §501. FAR threatens the existence of GPO and subsequently the FDLP. GPO provides a vital service to our "government of the people, by the people, for the people," by supplying government information in a coherent, centralized, and coordinated manner through the Federal Depository Library Program (FDLP). The proposed changes will negatively impact the public's ability to have timely, comprehensive permanent access to government publications in all formats, print and electronic. To quote James Madison in his letter to W.T. Barry, August 4, 1822, "A popular Government, without popular information, or the means of acquiring it, is but a Prologue to a Farce or a Tragedy, or, perhaps both."

Congress has recognized the need to keep GPO as the central printer with House Joint Resolution 122, P.L. 107-240, I trust the FAR Council to do the same.

Sincerely,

Barbara Norelli

Barbara Norelli
Social Sci/Instruc. Services Librarian
Skidmore College
Scribner Library, Rm. 109 Phone: 518.580.5513
815 N. Broadway Fax: 518.580.5541
Saratoga Springs, NY 12866 Email: bnorelli@skidmore.edu



"William Beegle"
<eff@beegle.org>

12/13/2002 11:21 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1349

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

William Beegle
5557 Hobart St. Apt. 8
Pittsburgh, PA 15217
USA



"Ann E Miller"
<ann.e.miller@duke.ed
u>

To: farcase.2002-011@gsa.gov
cc:
Subject: "FAR Case 2002-011" addendum

1350

12/13/2002 11:25 AM

I would like to add this comment to my previous submission.

In regard to the Office of Management & Budget's expectation of agencies voluntary compliance with submitting material to the Federal Depository Library Program.

It is difficult to see these expectations being met when OMB itself does not do so. I have discovered that the 2002 edition of the North American Industry Classification System (NAICS), published by OMB has not been distributed to depositories via the FDLP. This is a key resource for economists, businesses and industry researchers. It is a perfect example of the "fugitive document" issue. And a seriously alarming one.

Ann Miller

Ann E. Miller
Head, Public Documents & Maps
Perkins Library
Duke University
Durham, NC 27708-0177
phone: 919.660.5855
fax:919.684.2855
email:ann.e.miller@duke.edu

December 13, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW; Room 4305
ATTN: Laurie Duarte
Washington, DC 20405

1351

In reference to the Proposed Rule- Federal Acquisition Regulation; Procurement of Printing and Duplicating through the Government Printing Office. I would like to share a few thoughts for your review.

Here again, are we using the taxpayers' money to experiment with an uncontrolled process for printing and duplicating for the United States Government. The Office of Management and Budget memorandum M-02-07 makes a number of assumptions with no process or a well thought out plan. The OMB letter argues that putting ink on paper has been simplified. While the printing field has modernized. The complexity of the printing field is still a challenge to non subject matter experts.

All Government Agency's will need additional resources and some type of process, that I am afraid will make any process to convoluted. I believe the bid process in which GPO has 12,000 nationwide vendors is a remarkable process and will be extremely hard to duplicate and or copy by agency's across the US. If any process has too many variations most printers will find other ways of securing jobs and ways of making money. This will put the Government Agency's in a posture of scrambling to get their printing done.

The private sector printers, including small businesses that want to do business with the Government should still work through that safe guard of the American peoples money which is GPO. The process can be upgraded but not to the point that it causes total confusion on behalf of the US Government. Thank you for the opportunity to comment.

Anthony Hood
Private Citizen



Gwendolyn.Cowan@P
R.DOE.GOV

12/13/2002 02:34 PM

To: farcase.2002-011@gsa.gov
cc: Stephen.Zvolensky@pr.doe.gov
Subject: Department of Energy Comments on Printing and Duplicating Proposed Rule

1352

Date: December 13, 2002

Memorandum For: General Services Administration, FAR Secretariat
Attention: Laurie Duarte

Subject: FAR Case 2002-011, Procurement of Printing and Duplicating through the Government Printing Office (GPO).

The Department of Energy supports the policy decision to eliminate the current FAR requirement which implements the GPO monopoly on the acquisition of Federal printing services. This policy change is consistent with other monopoly-busting decisions such as that taken a number of years ago with respect to General Services Administration's (GSA) central supply programs. However, we believe the proposed rule implementing the new policy is poorly drafted and would benefit from significant revisions prior to its promulgation.

The only real issue that needs to be discussed in the FAR is the status of GPO as a federal supply source, i.e. from a "mandatory" source to an "authorized" source. DOE believes that printing should be treated like any other service that is acquired by the Government. There is no need to create unnecessary statutory or regulatory requirements which are otherwise applicable, such as the proposed regulatory changes at FAR 8.801(b). These proposed new requirements are not applied to federal acquisitions for other supplies and services and we see no need to establish special rules just for the category of printing services, e.g. lower synopsis threshold requirements, procedures on using GSA federal supply schedules/e-commerce, limitations on contract award terms, etc. As necessary, OMB can work with GSA outside of the regulatory process to identify the most appropriate acquisition strategy and methodology for acquiring such services as a central supply source. A regulation is not the place to decide these types of strategies.

It is also noted that the policy set forth in the proposed FAR 8.801(c) permits agencies to use the services of GPO until January 1, 2004 without conducting a competition, however; after January 1, 2004, agencies must demonstrate that GPO "offers the best combination of quality, cost, and delivery or, alternatively, the lowest overall cost in a competition based on cost or price and cost or price related factors." This requirement is not imposed on agencies with respect to any other available government supply source and we question its need. Agencies should be permitted to make sound business decisions in using GPO just as they do in using GSA and other available supply sources.

In conclusion, we believe the proposed regulations establish requirements for printing services that are not consistent with other Federal policies for the acquisition of services and that printing services should not be treated differently. We recommend that the proposed FAR coverage focus on clarifying 8.801 policy by providing that agencies may obtain printing services through (1) contracting with a private source, (2) using GPO as a Federally authorized source, or (3) using in-house printing operations consistent with the requirements of A-76. Regarding the latter requirement, the proposed new language establishes a test for use of in-house services which appears to be inconsistent with A-76 policies. There is no need to establish a separate test if agency in-house services are being reviewed and dealt with in accordance with the A-76 process.

1352

Thank you for considering our comments. Questions regarding our comments should be directed to Steve Zvolensky at 202-586-5936.



"Howe, Susan E."
<Susan.Howe@sba.gov
v>

12/13/2002 02:26 PM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc: "Clark III, Major L." <Major.Clark@sba.gov>
Subject: SBA Office of Advocacy Comments on FAR Case 2002-011

1353

The Office of Advocacy's comment letter on FAR Case 2002-011 is attached and inserted below in the text of the email.

<<FAR Case 2002-011 ADVO.doc>>

December 13, 2002

Ms. Laurie Duarte

General Services Administration

FAR Secretariat (MVR), Room 4035

1800 F Street, NW

Washington, DC 20405

RE: FAR Case 2002-011, Federal Acquisition Regulation; Procurement of Printing and Duplicating through the Government Printing Office (67 Fed. Reg. 68914, November 13, 2002).

Dear Ms. Duarte:

The Office of Advocacy of the U.S. Small Business Administration was created in 1976 to represent the views and interests of small business in Federal policymaking activities. The Office of Advocacy monitors agencies' compliance with the Regulatory Flexibility Act (RFA) and works with Federal agencies to ensure that their rulemakings are supported by analyses of small business impact. On August 13, 2002, President Bush underscored the importance of agency compliance with the RFA and the Office of Advocacy's role in giving a voice to small businesses in the rulemaking process when he signed Executive Order 13272, titled "Proper Consideration of Small Entities in Agency Rulemaking." Because the Office of Advocacy is an independent entity within the U.S. Small Business Administration (SBA), these views expressed by the Office of Advocacy do not necessarily reflect the views of the SBA or the Administration.

The Office of Advocacy is writing regarding FAR case 2002-011, Federal Acquisition Regulation; Procurement of Printing and Duplicating through the Government Printing Office. We commend the FAR Council for soliciting comments from small entities on this rule's impact. However, we note your failure to adequately justify a finding of no significant impact under the RFA.

1353

This proposed regulation was published in the *Federal Register* on November 13, 2002. The proposed rule is designed to implement the policy set forth in Office of Management and Budget (OMB) Memorandum Number M-02-07, Procurement of Printing and Duplicating Through the Government Printing Office (GPO) (May 3, 2002). In order to induce competition, save taxpayer money and promote small business opportunities, the memorandum eliminates restrictions that mandated use of GPO as the single source and frees agencies to select printing from a wide array of sources that can demonstrate their ability to meet the Government's needs most effectively. Advocacy's comments are limited to the application of the RFA to the proposed rule.

RFA Certification Requires a Factual Basis

In the proposed rule, the Federal Acquisition Regulation (FAR) Council certifies that the proposed rule will not have a significant economic impact on a substantial number of small entities within the meaning of the Regulatory Flexibility Act. While the FAR Council may be correct in its certification of no impact, the certification lacks a statement providing the factual basis for such determination as required by Section 605 (b) of the RFA.

Availability of Data for Factual Basis Determination

Prior to certifying a rule under Section 605 (b) of the RFA, Advocacy recommends that an agency perform a preliminary analysis of the proposed rule's impact on small entities. The results of this analysis will likely provide the factual basis for the certification. In this case, the FAR Council may want to review information regarding contract awards made by the GPO to small businesses versus large businesses in the printing industry and determine how the proposed rule may affect small business participation in government printing. In addition, the FAR Council may want to explore how this proposal will impact small printers that do not receive contract awards from the GPO.

Steps to Cure Inadequate Certification

Without a statement explaining the factual basis, it is nearly impossible for small entities to evaluate the economic impact of the proposed rule. Thus, the Office of Advocacy recommends the following actions to cure this inadequate certification: **First**, if the FAR Council has factual data supporting its certification, then it should be published as supplemental note in the *Federal Register* with a period for public comment. **Second**, the Office of Advocacy encourages the FAR Council to review carefully the comments submitted regarding the impact of its proposed rule on small entities. Based on the comments, the FAR Council should take appropriate steps to bring this rulemaking into compliance with the RFA by either publishing the factual basis for the certification or by publishing an IRFA for public comment.

Thank you for the opportunity to comment on this important proposal. If you have any questions regarding this letter, please feel free to contact the Office of Advocacy at (202) 205-6533.

1353

Sincerely,

/s/

Thomas M. Sullivan

Chief Counsel for Advocacy

/s/

Major L. Clark, III

Assistant Chief Counsel

Cc: Dr. John Graham, Administrator, Office of Information and Regulatory Affairs

FOOTNOTES:

¹ Pub. L. No. 94-305 (codified as amended at 15 U.S.C. §§634a-g, 637).

² Pub. L. No. 96-354, 94 Stat. 1164 (1980) (codified as amended at 5 U.S.C. §§601-612).

³ 5 U.S.C. §§605(b).

Suey Howe

Director, Office of Interagency Affairs

Office of Advocacy

Small Business Administration

409 Third Street, S.W.

Washington, DC 20416

Tel: (202) 205-6144

Fax: (202) 481-5406

E-mail: susan.howe@sba.gov

Web: <http://www.sba.gov/advo>



"Cynthia Pennino"
<CPennino@alutiiq.com>
m>

12/13/2002 03:10 PM

1354
To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc: "cathy@csa-dc.org" <cathy@csa-dc.org>, "Dusty Kaser, P.E."
<DKaser@alutiiq.com>
Subject: SUPPORT Federal Printing Reform

Dear Sir or Madam:

ALUTIIQ, LLC supports the Administration's efforts to reform government monopolies, such as the Government Printing Office (GPO) which unfairly penalize the American taxpayer and our nation's businesses and sacrifice government efficiency.

Alutiiq has subsidiaries that are small disadvantaged businesses participating in the Small Business Administration's 8(a) Business Development Program. Alutiiq has been successful and has developed an enviable resume providing support to the federal government in base operating services, construction, information technology, and security contracts. We are not allowed an opportunity under the current regulation to compete; as such, we support the proposed rule.

The proposed rule seeks to encourage competition, save taxpayer money and promote small business opportunities by eliminating restrictions that mandate the use of GPO as the single source and frees agencies to select printing from a wide array of sources that can demonstrate their ability to meet the government's needs most effectively.

The government should rely upon the private sector to provide goods and services necessary for the operation and management of federal agencies and departments. Outsourcing reduces the size of government and increases efficiency by limiting government to performing its core mission functions.

While GPO does currently contract a portion of the government's printing to the private sector, greater savings can be achieved by giving federal agencies explicit authority to obtain the best value it can for taxpayer dollars. Therefore, we support the proposed GPO reform.

Sincerely,

Cynthia M. Pennino
Manager, Corporate Programs
Alutiiq, LLC
3501 Denali Street, Suite 101
Anchorage, AK 99503
907-222-9500 phone
907-222-9513 direct
907-351-2173 cell
907-222-9501 fax
cpennino@alutiiq.com



"James Reffell"
<jreffell@obscure.org>
12/13/2002 03:03 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1 355

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

James Reffell
128 Clinton Park
San Francisco, CA 94103
USA



nBarrere@doc.gov
12/13/2002 03:03 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: DOC Comments on FAR Case 2002-011, Procurement of Printing and Duplicating through the Government Printing Office

1356

SUBMITTED ELECTRONICALLY VIA INTERNET TO farcase.2002-011@gsa.gov (GENERAL SERVICES ADMINISTRATION, FAR SECRETARIAT, ATTENTION LAURIE DUARTE)

The Department of Commerce is pleased to submit electronic comments on FAR Case 2002-0111. The proposed rule would amend the Federal Acquisition Regulation (FAR) to implement the policy set forth in Office of Management and Budget (OMB) Memorandum No. M-02-07, Procurement of Printing and Duplicating Through the Government Printing Office (GPO) (May 3, 2002).

The Department's experience using GPO for printing services has generally been positive but Commerce appreciates OMB's desire to emphasize competition and best value in acquiring printing services.

The Department offers the following comments and suggestions:

1. Time is Needed to Implement the Rule

We appreciate that OMB recognizes that implementation time is necessary and has given agencies until January 1, 2004, to use the services of GPO without conducting a competition. Since the rule brings printing under the competitive FAR acquisition process, agencies will need time to develop internal business procedures for managing and acquiring printing in this new environment.

2. Acquisition of Printing Should Be Treated the Same as Other Products or Services

The process of acquiring of printing (though specialized) is fundamentally no different than for any other product or service. However as drafted, the rule would subject printing to unique requirements that would likely lead to acquisition delays and confusion among government and contractor staff members alike. FAR procedures for acquiring printing should be the same as for other products and services.

3. Remove Special Synopsis Requirements and Response Time for Printing

As drafted, the rule would make synopsis (advertising) requirements and response times currently applicable to acquisitions over \$25,000, apply to all printing acquisitions above \$2,500. Establishing a threshold for printing requirements 10 times below the value of other requirements is inconsistent and inefficient. Each synopsis an agency publishes in the web-based Governmentwide point of entry (GPE), <http://www.fedbizopps.gov>, is likely elicit a "flood" of interested contractors that, particularly for small requirements, would unduly increase the time, complexity, and cost to acquire printing. We strongly urge these special requirements be eliminated.

4. Remove Special Requirements for Using the Federal Supply Schedule for Printing

Contrary to current practice, the rule would require all contractors participating in the schedule for printing be given electronic notice (via GSA's electronic quote system, "e-Buy" (www.gsaAdvantage.gov) and the opportunity to compete for any order over \$2,500. In addition, ordering offices would have to ensure that e-Buy notices are forwarded to the GPE for publication and that the forwarded notice is identified in the GPE as being "provided for informational purposes only."

1356

Requiring the government to compete every order above \$2,500 among the entire universe of GSA FSS schedule holders would be very expensive and time consuming--particularly for low dollar requirements. GSA has already determined that schedule prices are fair and reasonable and when the schedule is used correctly meets the definition for "competitive" acquisitions. Agencies should be encouraged but not required to use E-Buy when appropriate. The value of sending E-Buy notices to GPE for "informational purposes" is not clear but any such referrals should be done automatically by the E-Buy to reduce the overall costs and burden on ordering offices. We recommend removing these special conditions.

5. Remove the One-Year Term Limit on Indefinite Quantity/Indefinite Quantify (IDIQ) and Requirements Contracts and Associated Notice Requirement to GPE

Most of the Department's printing requirements have a 3 to 7 business day turnaround and it is essential to have contract vehicles in place that can support these needs. Planning, competing, and managing flexible quick-turnaround contracts is resource intensive. As drafted, the rule would restrict the term of IDIQ and requirements contracts to a one-year term which, after factoring in the placement expense, unduly increases the acquisition cost to the government and bid and proposal costs to contractors. A one-year term would require the government to begin re-competing printing contracts almost immediately after awarding them. The government would also lose a powerful performance incentive? the prospect of exercising option(s) if the contractor performs well under the contract. This limit should be removed.

We also recommend deleting the special requirement that agencies forward a notice to the GPE before placing an order under either IDIQ or requirements contracts and identifying in the notice that it is "provided for informational purposes only." The step adds unnecessary time and expense for little or no apparent value.

6. Eliminate the One-Year Term Limit on Blanket Purchase Agreements Entered into Under FSS Optional Schedules

(Please see response to #5 above)

7. How Will the Rule Impact Executive Agency Rider Publications?

Currently, executive agencies have the opportunity to receive many important rider documents and publications that are generated from other executive agencies. These requisitions are established and announced through GPO. The proposed FAR changes do not address how the executive agencies would continue to receive these documents and publications at the "rider" rate.

8. Cost for Providing Publications to Federal Depository Libraries

The proposed rule requires agencies provide GPO's Superintendent of Documents with a copy of each government publication to be printed for distribution to the Federal Depository Libraries and any other official use. This could be costly, particularly if the documents are not available electronically and involve multi-color or 4-color process requirements.

9. What Quality Assurance Standards, if Any, Would Apply to Printing?

The FAR does not specifically address printing quality assurance or standards. Has consideration been given to establishing government-wide standards or guidelines for product quality, quality levels, proofs, etc.? It might be beneficial to establish a government-wide quality assurance system or possibly even adopt the GPO Quality Assurance Through Attributes

1356

Program as a government-wide standard.

10. Existing Contractor Performance Records Reside with GPO

Currently, GPO performs pre-award surveys to determine if printing contractors are capable of performing at the required performance level, tracks contractor performance, and maintains performance records on printing contractors. Would GPO's performance tracking and performance records/resources be available to executive agencies?

If you have any questions about the Department's comments, please contact Nancy Barrere at Nbarrere@doc.gov or 202-482-5519.



"Brett Mitchell"
<brett.mitchell@alliedsolutions.net>

12/13/2002 02:40 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

1357

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Brett Mitchell
14625 Handel Dr. #236
Carmel, IN 46032
USA



SOCIAL SECURITY
The Commissioner

December 13, 2002

1358
Rec'd.
1/3/03

Rodney Lantier, Director
Federal Acquisition Regulation Secretariat
General Services Administration
1800 F Street, NW Room 4035
Washington, D.C. 20405

Dear Mr. Lantier:

The Social Security Administration (SSA) has reviewed the proposed Federal Acquisition Regulation (FAR) regarding procurement of printing and duplicating through the Government Printing Office (GPO) (FAR Case 2002-011). Background information about printing at SSA and detailed comments on the proposed Regulation are attached for your consideration in drafting the final Regulation.

SSA understands the importance of the separation of power issue inherent in having GPO as a mandatory source for all printing and fully supports resolving this issue in favor of the Executive Branch. However, we believe that as the proposed Regulation is written, duplicative staff support organizations in each Executive Branch Agency would be required to support printing procurements, acquisition timelines would be significantly lengthened and SSA's responsiveness to the public impaired. It also is unclear that any savings would actually be realized, or that competition would be meaningfully broadened.

We believe a good compromise would be to allow acquisitions by micro-purchasing (i.e., \$2,500 and under) to go directly to the private sector and allow Agencies the unfettered option of placing acquisitions over \$2,500 through GPO, GSA or directly to the private sector. The decision as to competitive service provider should be left to the Agencies. Simple, less time-sensitive jobs would most likely go to GSA and complex, more time-sensitive jobs would most likely go to GPO. This approach would obviate the need for additional administrative overhead on complex jobs, encourage quality and timeliness of work product, support competitive pricing and ensure widespread private sector competition.

We appreciate the opportunity to comment. Should members of your staff have questions, they may contact Michael Lott, Acting Associate Commissioner, Office of Publications and Logistics Management at 410-965-9297.

Sincerely,

Jo Anne B. Barnhart

1358

SOCIAL SECURITY ADMINISTRATION COMMENTS

PROCUREMENT OF PRINTING AND DUPLICATING THROUGH THE GOVERNMENT PRINTING OFFICE

FEDERAL ACQUISITION REGULATION (FAR) CASE 2002-011

SSA is the Government Printing Office's (GPO) third biggest Executive Branch customer and we consistently have the most complex work. SSA printed products are delivered to over 1,600 SSA offices and over 146 million SSA beneficiaries and members of the public. GPO handles over 2,000 procurement actions from SSA each year, all of which are contracted out to the private sector. This represents over 99.5 percent of SSA's printing. By the end of fiscal year (FY) 2003, the printing and mailing of almost all of SSA's individualized beneficiary notices will be contracted out. In FY 2002, SSA spent over \$33 million for printing, a total which includes GPO charges of only \$2.25 million (7.3 percent).

For that 7.3 percent fee, GPO provided not only full contracting services, but also extensive and crucial expert technical support, quality-control monitoring and troubleshooting at the contractors' printing plants nationwide, scientific testing and expertise, quality monitoring of custom paper manufacturing, electronic camera copy troubleshooting, administrative and freight services, and the services of their Office of Inspector General and Office of General Counsel. GPO's procurement processes are fast, responsive to our needs and ensure wide competition. And GPO provides consolidated billing with automated financial and management information. SSA is highly satisfied with GPO's value and performance.

If this regulation is implemented as written, SSA would have to increase staff allocations at the expense of front line operational allocations to replace the services now performed by GPO. We estimate that 5 additional contracting employees, 2 financial management employees and 17 project administration employees would be needed to fully support printing procurements, representing approximately \$1.7 million in annual salary costs. New overtime, per diem and travel costs of approximately \$200,000 per year would also be incurred. In addition, because of the significant difference in the procurement process, acquisition timelines would be considerably lengthened and SSA's responsiveness to the public impaired. It also is unclear that any savings would actually be realized, or that competition would be meaningfully broadened.

The regulation makes no provision for emergency in-house printing. Documents such as reports to Congress, SSA's Budget, the Trustee's Reports, the Performance and Accountability Report, etc., are extremely complex and time-sensitive, requiring changes and revisions up to and during the printing runs. The requirement for all agencies to do a full cost accounting and perform a public-private competition for any use of in-house printing facilities is needlessly burdensome and does not provide for legitimate operational mandates. We recommend that the severe restrictions on in-house printing in this regulation be limited to those agencies who produce more than 20 percent of their printing in-house. (§8.801a3)

1358

While there is a provision for GPO to ride agency print runs, there is no provision for GPO's Ride-the-Run service, which allows agencies to ride other agencies print runs. In FY 2002, SSA placed 60 orders to piggyback other agency print orders through GPO's Ride-the-Run service. Even with GPO's service charge, Ride-the-Run costs are roughly one-fifth of post-run costs. In FY 2002, SSA spent about \$240,000. (Due to every-other-year printing of certain Congressional documents, we expect to spend \$365,000 in FY 2003.) It is not administratively feasible for us to monitor the hundreds of print jobs which would be advertised daily. Therefore, we would have to pay a private contractor to assume this responsibility, establish new procedures and expend additional staff time for contract administration and internal coordination in order to retain some of the current savings. (§8.801e)

This regulation would still require the agency to pay fees. Some acquisitions under \$100,000 are paid using the government credit card; in FY 2002, 90 percent of SSA's print orders were under \$100,000. The card-issuing bank charges a 3 percent fee to the vendor for these transactions. There is the potential that some of these vendors will raise their prices to recover the fees. Similarly, the General Service Administration (GSA) charges vendors a .75 percent fee for its services. Some of our job costs could rise as the result of these fees.

GSA has indicated to us informally that they will establish Federal Supply Schedules (FSS) for printing if this regulation is implemented. SSA's experience with GPO multiple award contracts is that the cost of printing through these vendors is significantly higher than through the term contract or one-time bid process. This happens because the vendors cannot predict and plan for efficient use of press time and thus maximize ongoing profits. We expect FSS procurements to follow this pattern. Our choices will then be either higher prices or longer timelines. In FY 2002, SSA placed over 250 one-time bids through GPO because the jobs were so specialized and complex that our term contracts could not accommodate them. We expect the FSS would also fall short of our needs for these kinds of jobs and SSA would incur the full burden of contract administration for these jobs. (Supplementary Information, A2c)

Approximately 830 of SSA's printing acquisitions in FY 2002 were over \$2,500 and under \$100,000. The requirement to synopsise at the \$2,500 level will place a significant administrative burden on SSA and slow the process for acquiring printing services. Since acquisitions under \$100,000 are reserved for small business, we recommend that printing be treated like any other acquisition. (§8.801b2i)

The requirement to post a notice on e-Buy when using the FSS is neither an efficient nor effective way to procure low dollar simplified acquisitions. Current FSS procedures require the contracting officer to consider three vendor's prices. Expanding this to a limitless number of vendors will pose an administrative burden because the contracting officer will have to evaluate a limitless number of quotations. It would also slow the process for acquiring printing services. We recommend that the schedules for printing be used in the same manner as any other FSS acquisition, i.e., prices are sought from 3 sources. (§8.801b2iia)

SSA now has 47 term contracts established for our use by GPO. Our term contracts have option years, either because we can organize and generally predict certain kinds of printing and thus minimize administrative costs at SSA and overhead costs at the printers, or because computer

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and data line set-up and testing can easily take 6 or more months. We also prefer them because the contractor is required to take the job and must meet the contract timeframes. Therefore, the proposed restriction of the length of the contract term to 1 year is needlessly restrictive, inefficient and will not meet our business needs, especially in the case of printing contracts with long start-up timelines. As long as printers have the opportunity to compete for the original contract, it does not seem appropriate to limit the duration. The same comment applies to limiting the duration of blanket purchase agreements. Printing should be treated like any other acquisition. (§8.801b2iiB and §8.801b2iiiB)

Requiring informational postings before an order is placed under an indefinite quantity or requirements contract adds no value to the competitive process, needlessly slows the procurement process and is an unjustified administrative burden. (§8.801b2iiiA)

Most of our printing jobs are excepted from the Depository Library and GPO Document Sales Program requirements, i.e., they are administrative or operational in nature, or personalized beneficiary notices. Therefore, we would not be in favor of a requirement that all printing contracts include a clause directing the contractor to send copies to GPO. The decision and responsibility should remain at the Agency level. (§8.801d)

We are very concerned that the changes in the printing acquisition process proposed by this Regulation would serve to delay many of SSA's critical printing contracts. The requirement to notify GPO before advertising for bids would only add to these delays and increase administrative burden. We are unsure what purpose it serves and recommend that it be dropped. In addition, it is not clear whether GPO should be notified of each order placed on indefinite quantity contracts, requirements contracts, blanket purchase orders, purchases under \$2,500 and those placed through the FSS or only on one-time bids. Since SSA had 973 printing acquisitions under \$2,500 in FY 2002, this issue is of significant concern to us. (§8.801e)

Currently, printing is centralized and easily accounted for. GPO bills twice monthly, providing consolidated, automated financial and management information. SSA's central printing authority maintains automated records of acquisitions and requires yearly reports from regional printing authorities in order to comply with the Congressional Joint Committee on Printing's reporting requirements. At a minimum, this regulation would decentralize almost 50 percent of the agency's printing procurements through micropurchasing. There will be an inevitable degradation in the amount and nature of the management information available. In addition, many financial transactions will require manual handling at SSA. We are, therefore, concerned about the background comments to the regulation about regular reports to the Office of Management and Budget, since changes to the current process will inevitably impact on SSA's ability to fully comply with new reporting requirements. (Supplementary Information, A2b, A3 and B)



U.S. Department of Justice
Justice Management Division
Management and Planning Staff

Washington, D.C. 20530

December 13, 2002

Ms. Linda Nelson
FAR Secretariat
Room 4035
General Services Building
Washington, DC 20405

1359

Dear Ms. Nelson:

Enclosed are the comments from two of our components regarding FAR Case 2002-011. We note that you have not prohibited the use of GPO as a printing source and fully understand the need for competitive best value procurements. Their comments explain the services that GPO provides and that we believe would be far more costly for us if we had to provide for additional procurement or other resources to perform these tasks in-house. We are asking that you provide flexibilities as may be appropriate during the final implementation to address their concerns. These comments are operational concerns and have no bearing on the Department's position as cited in the Federal Register notice with the proposed rule.

If you have any questions on these comments, please call Larry Silvis on (202) 616-3754.

Sincerely,

A handwritten signature in dark ink, appearing to read "H.B. Myers".

H.B. Myers
Assistant Director
Procurement Policy and Review Group

Enclosures

1359

8400

MEMORANDUM TO: H. B. Myers
Assistant Director
Procurement Policy and Oversight Group
Justice Management Division

FROM: Patricia Hanson
Procurement Chief
Business Services Division

SUBJECT: Comments on Proposed Rule to Eliminate Restrictions That
Mandate Use of GPO as Printing Source

In accordance with your request of November 20, 2002, this Office, in conjunction with the Chief of the in-house printing operations, have reviewed the proposed rule to eliminate restrictions that mandate use of GPO as the single printing source. The Marshal Service is opposed to this proposed rule for the following reasons:

- Obtaining printing services in excess of \$2,500 directly from private sector sources, using competitive practices set forth in the Federal Acquisition Regulation (FAR), will require a 100% increase of professional staff (eight additional FTE's) within the printing organization.
- Decreasing the dollar threshold for synopsising printing requirements valued in excess of \$2,500 and limiting the length of indefinite quantity contracts for printing to one year, tend to work contrary to the procurement reform practices that were implemented in the 1990s with the passage of FASA and the Clinger-Cohen Act.
- Requiring each agency to develop and implement quality and production standards is an unnecessary duplication of effort that have already been uniformly established by the GPO.

Questions regarding this matter should be addressed to Patricia Hanson, via e-mail or on (202) 307-8640.

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**Facilities and Administrative Services Staff/Justice Management Division
Comments on the
Proposed Elimination of Restrictions That Mandated Use of GPO as a Printing Source
December 2002**

In the background of the proposed rules which appeared in the Federal Register/Vol. 67, No. 219/Wednesday, November 13, 2002, it is mentioned that "the Government Printing Office (GPO) relied on contractors to handle 84 percent of the printing work it performed in fiscal year 2001, it charged the Executive Branch premiums (above and beyond the private contractors' bids) of between 7 percent and 14 percent." In respect to work GPO performs for the Department of Justice (DOJ), 100 percent is contracted. None of the DOJ work is produced at GPO's in-house facilities. Thus, GPO functions solely as a centralized printing procurement operation for DOJ. In this role, GPO performs the following specialized printing procurement support services for DOJ under the 7 percent surcharge:

- Reviews requisitions and furnished materials for accuracy and completeness and for opportunities for savings through options.
- Performs electronic pre-press reviews.
- Provides cost estimates, consultations, and advice regarding technical specifications, scheduling, determination of quality levels, and procurement method.
- Prepares specifications and solicitations.
- Maintains an Automated Bid List System (ABLS), a computerized database which is a comprehensive list of 10,000 - 12,000 contractors, including the areas of their production interest as well as a guide to production and quality capability.
- Issues Bid/Quotation/Proposal solicitations using the ABLS and including advertisement and public posting of opportunities. They also issue solicitation materials upon request.
- Suspends or debar firms as appropriate after providing due process.
- Creates and maintains a list of suspended or debarred contractors.
- Receives and evaluates bids/quotations/proposals.
- Awards contracts to responsible contractors.
- Assures awards are made on the basis of overall low cost to the Government, taking into account quotations, discounts, freight and/or postal rates as applicable, and other identifiable costs.

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- Determines contractor responsibility by reviewing compliance on previous Government work, quality performance with respect to quality level required, other performance history, and financial capability as required, utilizing an on-site preaward survey as necessary.
- Reviews and takes action on submitted protests.
- Maintains the Quality Assurance Through Attributes (QATAP) program, updating QATAP contract terms to provide for new technologies and legal changes. QATAP helps in the provision of exact, objective specifications to assure that the Government does not buy (and pay) in excess of its needs.
- Uses QATAP and GPO's Quality Control and Technical Division for inspecting and testing product samples for compliance with technical specifications and quality level requirements.
- Proof reviews are performed by GPO's Typography and Design Division for quality level I and II multicolor work.
- Provides for contract administration, including routine proof reviews on one-time jobs.
- Takes appropriate action under QATAP to resolve quality complaints.
- Uses QATAP quality performance information in making responsibility and termination determinations.
- Provides for transportation and traffic management considerations to assure the most practical and economical means of transportation.
- Maintains contract compliance through proper non-responsibility determinations and job tracking, and takes appropriate action such as discounts or defaults for delinquent work.
- Issues contract modifications covering technical and contractual terms.
- Terminates contracts for default or the convenience of the Government, including negotiating equitable adjustments.
- Responds to disputes by examination and evaluation of contractor's position/documentation and negotiating settlement when in the best interest of the Government or defending an appeal when necessary and in the best interest of the Government.

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- Provides due process for disputes, include access to the GPO's Administrative Law Judge.
- Provides Inspector General services for appropriate audits of contractor claims and investigations.
- Provides legal opinions and services through GPO's General Counsel office in response to agency and/or contracting officer requests.
- Administers a Small Disadvantage Business (SDB) program to satisfy legal requirements.
- Examines, audits, and pays commercial contractor vouchers.
- Provides automated billing as well as requested acquisition statistics by billing address code.
- Provides for Superintendent of Documents riders to assure information products are included in the Federal Depository Library Program as required by law and as paid for by funds appropriated to the GPO for this purpose.
- Assures that the Superintendent of Documents sales and by-law distribution programs provide public access to information products as mandated by law.
- Monitors compliance with laws and regulations with respect to the use of vegetable oil-base inks, permanent paper, and recycled paper.

These procurement services for which GPO assesses a 7 percent fee are not described in the proposed rule and would not be cost-free if DOJ were to perform these print buying responsibilities. Performance of these tasks goes way beyond merely placing a delivery order against a pre-established contract. Printing is a custom business and the acquisition of printing is not like buying other standard products and services that are available as "off-the-shelf" items. Copy preparation, trim size, paper quality, ink colors, run length, due date, distribution plan, shipping method, and a host of other factors come into play to affect price. Knowledge of and experience with printing requirements and processes are essential to obtain the best possible value. This knowledge and expertise resides at GPO. Even if this function was completely centralized within DOJ, the Department currently does not have sufficient personnel resources to perform these tasks, nor could we accomplish these tasks for the 7 percent fee presently paid to GPO.

The vast majority of printed materials that DOJ generates are either time sensitive to meet litigation requirements that are court imposed or law enforcement sensitive. The DOJ currently has over 100 GPO contracts specifically established to meet its unique requirements. One such example is the printing of Supreme Court legal briefs which require a high quality level and are

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produced daily under very short production schedules. Generic general use printing contracts will not fulfill these special requirements. The DOJ also utilizes GPO contracts established for government-wide use to fulfill needs for specific items such as printing forms and view jobs placed against these contracts as work that could be switched to the General Services Administration's (GSA) multiple award contracts described in the proposed rule. However, it seems more advantageous to the Department to use GPO contracts versus GSA contracts. Both sets of contracts are solicited to and bid on by commercial printers. However, GPO fulfills many functions that need to be performed in the acquisition of printing, which DOJ can not accomplish in an economical and timely fashion on its own, and that are not addressed in the proposed rule.

The proposed rule does not address the acquisition of printing from UNICOR Federal Prison Industries, Inc. (FPI) as a procurement option and one that should be given special consideration. The FPI is required to serve both as a training and employment program for a large number of inmates and the program functions as a means by which prison officials control potential problems caused by the inherent idleness of everyday life in the prisons.

The Federal Bureau of Investigation printing plant; and in-house high speed copy centers for the Drug Enforcement Administration, United States Marshals Service, and DOJ litigating divisions handle production of material that is determined "law enforcement sensitive" for ongoing investigations, operations and cases that are vital to national security. The selection of the printing production source has to be determined on the need to control who views such information and meeting the required production schedule beyond those issues described in the proposed rule.

The Department currently uses various set aside programs for production of its printed material whenever feasible. The selection of a printing production source has to be made based on the technical requirements of each job. The technical requirements of a particular job determine the type of printing, binding and finishing equipment, and corresponding labor skills necessary to produce each job. Thus, a small job could have production specifications that require the printer to have high technical expertise and an investment in extremely expensive equipment beyond that possessed by small businesses. The proposed rule requiring a small business set aside based on overall job cost would pose problems in the procurement of such jobs.

The Department currently receives print order "rider" notifications from GPO, which they regularly send out to all government agencies. Riders typically have very short response times and enable Government agencies to submit orders if they are interested in riding the initiating agency's print order for a specific document. The rider notification program results in a significant savings to agencies in acquiring such materials. If there is no central contracting point for printing procurement, then the responsibility for notifying all agencies regarding rider orders will fall upon the initiating agency when it is goes through the contracting process. This will be quite burdensome to perform and will increase the chances that other agencies will not be notified. If this happens, the availability of government generated information to other government agencies needing the same information will likely be reduced.

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The proposed rule mentions that the FAR Council is considering including a clause that contracting officers would be required to insert in contracts a requirement that "the contractor shall submit one copy of each Government publication, as identified by the Government in the contract, to the Superintendent of Documents..." and "The proposed rule also recognizes that when agencies contract directly with private sector printers, the GPO may wish to purchase copies of Government publications from such printers for depository libraries..." However, under current law, "The cost of printing and binding those publications distributed to depository libraries obtained elsewhere than from the Government Printing Office, shall be borne by components of the Government responsible for their issuance; those requisitioned from the Government Printing Office shall be charged to appropriations provided the Superintendent of Documents for that purpose." (Pub. L. 90-620, Oct. 22, 1968, 82 Stat. 1283.) The cost to DOJ to fulfill this requirement for the depository libraries copies could equal or surpass the cost of the original printing procured and produced elsewhere.

Overall, we view the proposed rule as being burdensome to Federal agencies. It will be difficult to implement in an orderly fashion and extremely costly to DOJ if it becomes effective in its current language.



"Lise Albury"
<lalbury@norwich.edu
>

To: farcase.2002-011@gsa.gov
CC:
Subject: FAR Case 2002-011

12/13/2002 03:46 PM

1360

Dear Sir or Madam,

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through

the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public

access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program. The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that our citizens have current, comprehensive, and permanent access to the federal government information they need.

GPO plays a critical role in providing valuable government information to the public, and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and

52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information.

OMB's proposed amendments violate the federal statute that requires agencies

procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In

addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the

vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves

the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendment ("each agency shall ensure a copy of the publication is provided...")

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does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents. Further, the proposed language allows agencies to provide GPO with publications in unusable or inappropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means."

Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software).

The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files).

Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is

inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal

requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would

allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of

Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and individuals

depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide

for a continued, cost-effective Sales Program. Federal law gives GPO primary responsibility for providing public access to federal government information

through the FDLP and the Sales Program. Federal law ensures that federal

government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for

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future use. Information professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you very much for your consideration.

Lise Albury
Government Documents Librarian
Kreitzberg Library
Norwich University
23 Harmon Drive
Northfield, VT 05663
(802)485-2523



"Thomas Moore"
<twmoore@acm.org>
12/13/2002 03:23 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1 361

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Thomas Moore
64 McDonald Rd
Edgewood, NM 87015
USA



"Linda Kennedy"
<lmkennedy01@hotmail.com>

To: farcase.2002-011@gsa.gov
CC:
Subject: FAR Case 2002-011

12/13/2002 03:20 PM

1362

December 13, 2002

TO: Laurie Duarte
FAR Secretariat, General Services Administration

RE: FAR Case 2002-011:

I am writing in strong opposition to the Proposed Rule for "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office (GPO)" published in the Federal Register of November 13, 2002.

The proposed Federal Acquisition regulation violates existing statutes, will not accomplish the stated goal, and will impair the public's access to federal government information in both the short and long term.

As you should be aware, the proposed regulations violate the provisions of Title 44 U.S.C. section 501 by allowing agencies to procure printing outside the Government Printing Office. The amendments contradict section 1903 of Title 44 by requiring the Superintendent of Documents to bear the costs of printing and binding publications for distribution to depository libraries, and section 1710, which requires a copy be provided to the Superintendent of Documents for Cataloging purposes.

The net effect of these changes, regardless of the intent, will be a significant reduction in the number of publications that are identified, distributed and cataloged for future access. In spite of the trend toward electronic dissemination (in which GPO is strongly participating) these regulations will have a deleterious long-term effect on access to information. Why? Because even though publications may be disseminated electronically, they usually start out as a printed publication. A few copies of that publication may be distributed to a few interested folks by the agency and a copy may (or may not) be put on an agency web site, where it will live for a while and then disappear.

As a University of California, Davis librarian who deals with historical research questions every single day, I know that the only reason we are often able to find the requested information is because the Government Printing Office disseminated that publication through the Depository Library Program (FDLP). Even more importantly, access is ensured because the publication is cataloged to enable researchers to know of its existence—even a hundred years later. The information world, and most particularly the government information world, is in a period of transition, and we still need to have GPO capturing and providing bibliographic access for as many publications as possible. As a government information librarian working in a large research library, I also work extensively with information in a variety of electronic formats. I know that GPO involvement in the printing procurement process for federal publications is still serves a vital role in information access, regardless of whether that publication is ultimately disseminated to libraries in paper or electronic form. There are enormous gaps in preservation and access for federal government information and we still vitally need the access services provided by the FDLP. Keeping the

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GPO as a part of the printing procurement process—as required by law—is still a critical part of maintaining access. The safeguards and enforcement mechanisms in these proposed regulations only be described as totally ineffectual and opening the doors to a massive bypassing of the Federal Depository Library Program. When and if the depository library program needs to be revised, let it be through revision by Congress of the statutes that created the Program.

If the intent of these regulations is to privatize printing, it should be very clear, from information provided by the Government Printing Office, that these regulations are completely unnecessary. They will end up costing additional money and hurt small printers since the GPO already has an efficient and effective system of outside procurement. In response to suggestions that printing could be better procured via individual agencies, the Government Printing Office provided information that effectively rebutted those suggestions. If GPO already procures 75% of its work from the private sector (and 84% of Executive Branch work), and procures 77 % of that work from small business contractors, the proposed FAR regulations are superfluous.

If the response were that federal agencies could individually procure their own printing in a more cost-effective manner, I would suggest that is extremely unlikely. To duplicate in each agency the highly competitive procedures that GPO has developed and to similarly duplicate the staff expertise and resources for printing procurement support is clearly not cost effective and would result in increased costs to the agencies to the taxpayers.

Sincerely yours,

Linda M. Kennedy
2506 Rockwell Avenue
Davis, California 95616
(530) 753-0252

lmkennedy@ucdavis.edu

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1363



"Patrice McDermott"
<pmcdermott@alawas
h.org>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

12/13/2002 03:46 PM

Please find attached comments on FAR Case 2002-011.

Please contact me if you have any questions or difficulties with this transmission.

Patrice McDermott
Assistant Director, Office of Govt Relations
American Library Association
1301 Pennsylvania Avenue N.W. S. 403
Washington, DC 20004-1701
202-628-8410



OMB_FAR_Comments_Final.c

**FAR Secretariat
General Services Administration
Comments on FAR case 2002-011
Submitted via the Internet to--farcase.2002-011@gsa.gov
December 13, 2002**

1363

RE: FAR CASE 2002-011

We are pleased to have the opportunity to comment formally on the proposed FAR amendments to implement OMB Memorandum No. M-02-07 entitled "Procurement of Printing and Duplicating through the Government Printing Office" (GPO) (May 3, 2002). This proposed rule was published in the *Federal Register*, Vol. 67, No. 219, November 13, 2002, 68914-8. Our comments today are submitted on behalf of the American Library Association, the American Association of Law Libraries, the Association of Research Libraries, the Medical Library Association and the Special Libraries Association.

The library community has a strong interest in federal information policy and, collectively, our associations represent thousands of libraries and librarians across the Nation, including the more than 1300 institutions that participate in the Federal Depository Library Program (FDLP). Our members know first-hand, on a daily basis, the importance and impact that government information has on the health and lives of all Americans, on the economic well being of our Nation and on the preservation of our democracy.

Libraries across the Nation are key access points for the American public. Librarians are the information professionals who assist thousands of members of the public on a daily basis in locating and using the government information they need, or connecting our citizens with government services or agency personnel. We are the knowledge experts who understand the complexities and importance of organizing information by building directories and catalogs, and of preserving information, which in the electronic environment is one of our most difficult challenges.

The Public's Right to Access Government Information

Access to government information is an essential principle of a democratic society and a valuable public good created at taxpayer expense. The American public relies on unfettered access to information by and about their government to actively participate in our democracy and to hold government accountable for its actions. Concurrently, government has an affirmative obligation to disseminate and provide broad public access to its information, to guarantee its authenticity and integrity, to ensure that government information remains in the public domain, and to ensure its continuous, permanent availability and preservation.

In the print environment, the FDLP has proven to be an extremely effective partnership program among Congress, federal depository libraries, agencies and the Government Printing Office (GPO) to provide government publications to the American public. The FDLP requires a strong system of coordination and centralization, including an effective

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and transparent system to bring government publications into the FDLP. Any proposed change to the public access program currently in place must continue to meet these critical goals. The proposed FAR changes do not create such a system, as many important implementation questions are not addressed, and the changes would, in effect, create a void. As we will discuss below, such a system is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public.

Introductory Comments on Proposed FAR Amendments

The proposed changes to the FAR are in violation of 44 U.S.C. §501 which states that "All printing, binding, and blank-book work for Congress, the Executive Office, the Judiciary, other than the Supreme Court of the United States, and every executive department, independent office and establishment of the Government, shall be done at the Government Printing Office...." The link between print procurement through GPO and the Office of the Superintendent of Documents (SuDocs) that administers the FDLP has served the American public very well. When agencies procure publications through the GPO as mandated by law, the Superintendent of Documents determines whether that publication falls under the Title 44 §1901 definition of "Government publication." If so, the Superintendent of Documents is able to ride the procurement order so that sufficient copies for federal depository libraries, the GPO Sales Program and other dissemination services are procured at very low cost.

The proposed changes to the FAR are also in violation of 44 U.S.C. §1903 which states that "The cost of printing and binding those publications distributed to depository libraries obtained elsewhere than from the Government Printing Office, shall be borne by components of the Government responsible for their issuance..." According to the law, when agencies procure outside of GPO, the agency itself is responsible for the costs associated with providing a sufficient number of copies for depository distribution. The Superintendent of Documents is not authorized to bear the costs of obtaining copies of publications produced outside of GPO. The FAR amendment proposing that the GPO/Superintendent of Documents would bear the costs of producing agency publications for public access through the FDLP is contrary to current law.

Additionally, Congress has explicitly voiced its strong disagreement with the Administration on the proposed amendments to the FAR by including provisions in the continuing resolutions funding government operations that would prevent agencies from using any appropriated funds to procure publications outside of GPO. Most recently, the language in Public Law 107-294 (H.J.Res.124) extending funding through January 11, 2003, explicitly states that:

``Sec. 117. (a) The Congress finds that section 501 of title 44, United States Code, and section 207(a) of the Legislative Branch Appropriations Act, 1993 (44 U.S.C. 501 note) require that (except as otherwise provided in such sections) all printing, binding, and blankbook work for Congress, the Executive Office, the Judiciary, other than the Supreme Court of the United States, and every executive

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department, independent office, and establishment of the Government, shall be done at the Government Printing Office.

“(b) No funds appropriated under this joint resolution or any other Act may be used--

“(1) to implement or comply with the Office of Management and Budget Memorandum M-02-07, ‘Procurement of Printing and Duplicating through the Government Printing Office’, issued May 3, 2002, or any other memorandum or similar opinion reaching the same, or substantially the same, result as such memorandum; or

“(2) to pay for the printing (other than by the Government Printing Office) of the budget of the United States Government submitted by the President of the United States under section 1105 of title 31, United States Code.”

Agencies that today legally bypass GPO for printing procurement, such as through a waiver, are obliged to provide: a) one tangible copy to the Superintendent of Documents for cataloging purposes under 44 U.S.C. §1710; and, b) the necessary number of copies for federal depository libraries. Unfortunately, the record of compliance with these dual requirements by agencies that receive a printing waiver is not reassuring. For example, a 1998 review by the Department of Health and Human Services Inspector General found that components of the National Institutes of Health receiving such waivers had not complied with either requirement (44 USC §1903 and §1710) for 77% of the publications they produced outside of GPO. This discouraging statistic offers a snapshot of the difficulties of enforcing agency compliance when government publications are produced outside of GPO.

The impact on the FDLP will be felt as well as in the diminishing number of publications collected for by-law distribution to the Library of Congress and the National Archives and Records Administration, as well as those collected for the International Exchange Program.

The summary of the proposed FAR changes state that “Moreover, specific new actions are proposed to improve dramatically the depository library system by ensuring that all Government publications are in fact made available to the nations’ depository libraries.” Although it is laudable that this language is included in the proposed FAR amendments, the implementation procedures proposed are contrary to existing law and would most likely result in reduced public access. Agencies would be allowed to bypass the existing system, which allows printing and distribution to federal depository libraries to occur transparently, and GPO/Superintendent of Documents would have to provide the necessary funding. The strong language that Congress has added to the Continuing Resolution raises concerns about whether Congress would fund GPO/Superintendent of Documents through the annual appropriations cycle to support agencies that violate the law.

COMMENTS ON SEC. (d)**Subpart 8.8—Acquisition of Printing and Related Supplies****8.801 (d)**

The proposed amendment states that “For each Government publication to be printed, the agency shall ensure a copy of the publication is provided to the GPO’s Superintendent of Documents for distribution to the Federal Depository Libraries and any other official use as may be necessary for the GPO to carry out its responsibilities. ... Transmission to the Superintendent shall be made using electronic means unless such means are unavailable.” Similar language is also found in the proposed clause to be inserted into contracts for the printing of government publications: “To assist the Government in ensuring effective distribution of Government publications printed under this contract, the contractor shall submit one copy of each Government publication, as identified by the Government in the contract, to the Superintendent of Documents from the Government Printing Office. Transmission shall be made using electronic means unless such means are unavailable.”

This paragraph and the proposed contract clause are apparently intended as the “concrete steps” to be taken to “ensure that all Government publications are in fact provided to the GPO’s Superintendent of Documents for distribution to the Federal Depository Library Program.” We appreciate that the proposed amendments acknowledge the importance of agency compliance with the FDLP and set it as a goal, but there is no concrete history to support the assumption that such compliance will occur. To date, when agencies procure outside of GPO or print in-house, there is neither an economic incentive nor an enforcement mechanism in place today—nor one proposed under this amendment to the FAR—to ensure that agencies provide federal depository and cataloging copies to the Superintendent of Documents.

The effect of the FAR amendment will be to further exacerbate a problem that it purports to solve: fugitive documents. It will more likely than not result in less access to government information for the American public. When agencies do not utilize GPO services as set forth in statute, the public suffers because that information is often inaccessible and sometimes lost. The 1998 review of the National Institutes of Health—an agency that has statutory authority to procure and print some of its publications—determined that only 22 percent of the NIH titles within the scope of the FDLP were actually provided to GPO for inclusion in the FDLP. This means that only about one out of every five publications issued by the NIH has been cataloged by GPO and provided to the public through federal depository libraries as mandated by law.

The amendment appears to presume that agencies would transmit electronic files to GPO in standardized, usable formats that could then be efficiently made available to the public in electronic formats in a cost-effective way. Without such specifications and a coordinated national program to systematically capture, preserve, and maintain ongoing access to electronic government data, important information may be lost every day as files come and go from agency Web sites and computer servers. The information becomes inaccessible and thus useless to the American public whose tax dollars have supported its creation.

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Moreover, absent specifications and a coordinated program, the risks are high that GPO would receive such copies in proprietary formats or in a variety of formats used to create reproducible pages. As such, they may be in formats that could not be readily disseminated via the Internet for search and retrieval. In addition, the transmissions may not be in formats that are compliant with §508 of the Rehabilitation Act of 1973.

Finally, the stated goal of the proposed amendment to the FAR is to improve both access to and cost effectiveness in dissemination of government information. The result of this proposal, however, is likely to be neither. The lack of standards for the proposed transmission of a copy would require a substantial increase in the workforce needed to receive, open, and analyze the format, language, and file structure to enable preparation and use. All of this would impose a significant time delay in making information accessible to the public and would call into question the authentication, exact replication and official nature of the reproduced versions. It would, moreover, obviate any alleged cost savings to the public.

COMMENTS ON SEC. (e)

Subpart 8.8—Acquisition of Printing and Related Supplies

8.801 (e)

The proposed amendment states that “Whenever feasible, the agency should consult with the GPO’s Public Printer before issuing a solicitation for a printing acquisition to determine the number of copies of a Government publication the GPO may wish to obtain and the agency shall take reasonable and appropriate steps to assist GPO if GPO wishes to purchase copies from a private contractor employed by the agency.” This paragraph violates 44 U.S.C. §1903, which states that “[t]he cost of printing and binding those publications distributed to depository libraries obtained elsewhere than from the Government Printing Office, shall be borne by the components of Government responsible for their issuance...” For the purposes of the Federal Depository Library Program, GPO is not authorized to bear the cost of copies produced “elsewhere.” Moreover, as the supplementary information to this proposed amendment notes, specific language in the final continuing resolution for FY 2003, Public Law 107-294 (H.J. Res. 124) prohibits the expenditure of appropriated funds for printing outside GPO. It is legal neither for the agencies nor for GPO to pay for depository copies produced “elsewhere.”

Even were it legal for GPO to bear these costs, the proposed amendment sets up no guidelines nor mechanism for the over 6,000 entities generating printing in the federal government to assist these entities to follow the requirement to interact with GPO. It simply assumes that the federal entities will accomplish what to them is, more often than not, a secondary goal, the provision of copies to federal depository libraries. With no oversight proposed and no enforcement mechanism in place, this provision obviates the stated intent of the amendment: “to improve dramatically the depository library system by ensuring that all Government publications are in fact made available to the nation’s depository libraries.”

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As noted in the Introductory Comments, the proposed amendment would result not only in a degradation of the number of publications available for distribution to federal depository libraries, but also of the number of publications collected for by-law distribution to the Library of Congress and the National Archives and Records Administration, as well as those collected for the International Exchange Program. It would also have a deleterious impact on the availability of government publications for sale since there is a legal question as to whether the Superintendent of Documents is authorized to buy government publications from commercial printers for resale as suggested. 44 U.S.C. §1705 indicates that the Public Printer shall print publications for the Sales Program. Moreover, Superintendent of Documents is the only Federal agency authorized to run a centralized sales program for the broad range of government publications.

Comments on Supplemental Information: (3) Information Distribution

The FAR Council is asking for comments on a draft clause on Information Distribution that contracting officers would be required to insert in contracts for the printing of government publications where a contractor will assist the government in ensuring the Superintendent receives a copy of the publication. We have commented on this clause concurrent with our comments on 8.801 (d) above. We consider that this proposed clause creates not only the same difficulties as we noted above, but also adds an additional layer of improbability and difficulty in ensuring compliance.

This section also notes that, “OMB, in consultation with interested stakeholders, will also determine whether current policies or practices related to the publication of Government information need to be changed to ensure maximum possible reliance on distribution in cost-effective electronic formats.” We are pleased that OMB recognizes the need for this planned consultation. We would note that such an examination would need to be wide-ranging and look at a diverse set of policies and practices. This Administration has a commitment to citizen-centric e-government, including growth towards a fuller electronic environment and financial investments in technology, and there has been individual progress in many agency programs.

Nonetheless, overall progress government-wide toward the availability, usability, and permanent public accessibility of government information from the users' perspective has been slow, uncoordinated and without a clear vision for the future. This is particularly the case with government information that is “born digital.” The move to an e-government has not been accompanied by the development of a comprehensive policy framework focusing on the life-cycle of electronic government information. Access in many cases has been disorganized and untimely and there is often no recognition of the value of that information to the public and the need for it to be available for continuous future use and for preservation. A strong and positive framework is absolutely necessary to ensure that the public will have seamless, continuous and permanent access to important electronic information. We believe that a strong, centralized, coordinated and managed federal information dissemination and access program, such as the FDLP, is one key component necessary to achieve these important goals.

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The “new FAR coverage,” however, militates against the development of a comprehensive policy framework focusing on the life-cycle of electronic government information. Such a framework is long overdue and crucial to the success of e-government. As noted above, 8.801(d) will, if complied with at all, likely result in agencies transmitting electronic files to GPO in a myriad of electronic formats that cannot be efficiently made available to the public in a cost-effective way.

CONCLUSION

The proposed FAR change is very problematic in two respects: first, it violates provisions in current law that mandate agency use of GPO to procure publications and that charge agencies the costs for depository copies when they procure elsewhere; and second, it will likely make the problem of fugitive documents—a longstanding problem that it intends to ameliorate—even worse. This proposed change in regulation has drawn strong opposition from Congress on a bipartisan and bicameral basis. While the Office of Management and Budget may disagree with these provisions of Title 44, they should not propose a change to the FAR that ignores the law.

As written, without specific detail as to how agencies would comply with providing publications to the Superintendent of Documents for cataloging and distribution of print materials, the proposed change fails to adequately support the needs of the federal depository community or, more importantly, the public. While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR amendment are so vague that the result will be more fugitive publications, not fewer. Moreover, the lack of any proposed oversight and any enforcement mechanism obviates the stated intent of the amendment: “to improve dramatically the depository library system by ensuring that all Government publications are in fact made available to the nation’s depository libraries.”

While the proposed change may seem reasonable to those unfamiliar with the workings of the FDLP, it lacks the necessary ingredients of coordination and centralization that are necessary for meaningful public access to government information. Today, the Superintendent of Documents, working with professional library personnel, provides a strong, centralized, coordinated and managed federal information dissemination and access program through the FDLP.

To achieve the stated goals of the proposed FAR amendments, it would be beneficial for OMB to invest its time and resources in:

- ensuring that agencies are committed to dissemination and public access;
- facilitating the ability of agencies to participate in the FDLP and make their publications broadly accessible to the public; and
- enforcing compliance where needed to ensure that agencies participate in the Federal Depository Library Program.

If the Office of Management and Budget considers that changes to the law are necessary to accomplish these goals, it could commission an independent outside study to examine these complex issues and then work with Congress to make any necessary changes. We

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urge the FAR Council to withdraw this proposal and keep in place the current system of procurement and printing through the Government Printing Office.

ORGANIZATIONAL BIOGRAPHIES

THE AMERICAN ASSOCIATION OF LAW LIBRARIES (AALL)

The American Association of Law Libraries is a nonprofit educational organization of over 5,000 members who respond to the legal information needs of legislators, judges, and other public officials at all levels of government, corporations and small businesses, law professors and students, attorneys, and members of the general public. AALL's mission is to promote and enhance the value of law libraries, to foster law librarianship, and to provide leadership and advocacy in the field of legal information and information policy. Contact: Mary Alice Baish (202-662-9200)

THE AMERICAN LIBRARY ASSOCIATION (ALA)

The American Library Association is a nonprofit educational organization of over 65,000 librarians, library educators, information specialists, library trustees, and friends of libraries representing public, school, academic, state, and specialized libraries. ALA is dedicated to the improvement of library and information services, to the public's right to a free and open information society--intellectual participation--and to the idea of intellectual freedom. Contact: Patrice McDermott (202-628-8410)

THE ASSOCIATION OF RESEARCH LIBRARIES (ARL)

The Association of Research Libraries is a not-for-profit organization representing 124 research libraries in the United States and Canada. Its mission is to identify and influence forces affecting the future of research libraries in the process of scholarly communication. ARL programs and services promote equitable access to, and effective use of, recorded knowledge in support of teaching, research, scholarship, and community service. Contact: Prue Adler (202-296-2296)

THE MEDICAL LIBRARY ASSOCIATION (MLA)

MLA is a professional organization established in 1898 and headquartered in Chicago that represents over 4,000 individuals and 1,200 institutions involved in the management and dissemination of biomedical information to support patient care, education, and research. Contact: Mary Langman (312-419-9095 x.27)

THE SPECIAL LIBRARIES ASSOCIATION (SLA)

SLA is an international professional association serving more than 14,000 members of the information profession, including special librarians, information managers, brokers, and consultants. Contact: Doug Newcomb (202-939-3676)

ENDORSED BY

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Arizona Toxics Information

Contact: Michael Gregory (520-432-5374)

Awake In Philly Community Education Group

Contact: Dave Jackson (215-722-7008)

Consumer Project on Technology

Contact: James Love (202-387-8030)

Electronic Freedom Foundation

Contact: Ren Bucholz (415-436-9333 x 121)

Federation of American Scientists

Contact: Steven Aftergood (202-454-4691)

OMB Watch

Contact: Sean Moulton (202-234-8494)

Peninsula Citizens' Advocate-Bulletin

Contact: Jim Warren (650-851-7075)

Project on Government Oversight

Contact: Danielle Brian (202-347-1122)



"Angie Felix"
<AFELIX@cwa-union.org>

12/13/2002 03:19 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: William J. Boorman Statement

1364



121103 FAR Comments Re OMB.c

1364

Statement of William J. Boarman, Vice President
Communications Workers of America
Regarding FAR Case 2002-011 RIN 9000-AJ51, Based on Office of Management and
Budget (OMB) Memorandum M-02-07, "Procurement of Printing and Duplicating
Through the Government Printing Office" (GPO) (May 3, 2002)

On behalf of the 700,000 members of the Communications Workers of America, including those employed by the Government Printing Office, we provide the following views on FAR Case 2002-011 RIN 9000-AJ51, based on Office of Management and Budget (OMB) memorandum M-02-07, "Procurement of Printing and Duplicating Through the Government Printing Office" (GPO) (May 3, 2002).

We believe that OMB's proposal to splinter GPO's functions among the 130 federal agencies which produce reports and documents is a serious threat to one of the most fundamental principles of our democracy: providing adequate information to assure a well-informed electorate.

While OMB cloaks this proposal in a number of laudable goals—including efficiency, economy, and more access for small and minority-owned business to bid successfully on government printing work; these objectives are a ruse to cover OMB's purpose to wrest congressional control over government's printing function on behalf of the Executive Branch.

GPO currently contracts with private printers for more than 75 percent of its gross volume of printing. The remaining 25 percent of that volume is work which is so specialized in terms of the equipment required, deadlines and time frames, or because of security considerations that it can not be performed by private printers.

Clearly, if there is a legitimate concern that small and minority-owned firms have been shut out from the bidding process, there are adequate remedies far short of this draconian proposal.

Today, GPO is much more than just a print shop for government documents, although it does perform that function admirably. It is also a multi-functional information agency which provides the average citizen with a tremendous range of documents and electronically-accessed files. In fact, GPO is the world's largest distributor of publications and information. According to the agency's own records, GPO's online services provided 355 million downloads, and offers 9,500 titles of ink-on-paper documents which can be purchased in person at any one of the agency's 18 regional bookstores, or on-line through the respected GPO Access, e-commerce site. GPO processes more than 1,800 sales orders every day.

These are functions which are vital to the health of America's democracy and must be preserved and protected. One important step to resolving any misunderstanding on the part of the Administration and the public would be for Congress to take the simple

step of changing the name of the Government Printing Office to the Government Information and Printing Office.

Clearly, a policy which subtracts any elements of the current operation—as the OMB proposal does—will weaken the ability of the GPO to perform others. OMB’s plan to remove the foundation of GPO’s capabilities—its supervisory role over all federal executive branch printing—would remove the fundamental infrastructure upon which GPO is constructed.

OMB, either deliberately or out of its own misunderstanding of these facts misconstrues the purpose behind the various Public Laws which establish Congress as the primary guardian of the government’s information responsibilities.

Under the Constitution’s separation of powers doctrine, each branch of government has discreet and fundamental responsibilities to the people. We believe that the Founding Fathers recognized that Congress—as the body which is closest to the electorate—is the governmental entity most responsive and closest to the people. As such, it is far less likely than either the Executive or the Judicial branches to withhold information from the citizenry.

Perhaps that point should be made a part of any future reiterations of GPO’s purpose as it is now contained in PL 103-283, Title II, Paragraph 107, which was enacted on July 22, 1994, stating: “None of the funds appropriated for any Fiscal Year may be obligated or expended by any entity of the Executive Branch for the procurement of any printing related to the production of government documents including printed forms, unless such procurement is by or through the Government Printing Office.” We believe that Congress needs to remind the Office of Management and Budget of that statute and act to enforce it.

CWA’s interests in communications and information extend to virtually any policies or programs that affect those primary tools and products of our members nationwide. However, our organization has a particular affinity for GPO. The International Typographical Union, now part of the CWA, represented the employees of GPO when it opened under the administration of President Abraham Lincoln some 140 years ago.

GPO has been in the vanguard of labor relations for more than 75 years. It holds the distinction of operating under the first collective bargaining statute on the books, the Keiss Act of 1927.

It is a point of pride among GPO’s union employees that they have been in the forefront of transitioning GPO into a model of high tech capability and efficiency. The agency was among the first to adapt electronic imaging and typesetting to its extensive work assignments. Those processes have evolved to embrace the opportunities afforded by the internet. We believe that the direct involvement of union employees in product

quality and improved productivity is a byproduct of GPOs long commitment to and acceptance of collective bargaining.

Today, GPO continues to produce huge volumes of information, including the daily Congressional Record and the Federal Register, under extremely tight time constraints and budgets. The agency has set standards of reliability, quality and consistency that are the envy of the printing industry. The sheer volume of products that flow from the GPO require close attention to style and uniformity. Ensuring that consistency is one of the most important tasks performed by the printers we represent.

In the peculiar culture of Washington, experience is sometimes derided as a liability. And, it's often true that outsiders can provide us with fresh ideas and creative approaches. But, when it comes to the operations of the Government Printing Office, we should be careful to give proper attention to "institutional memory."

Over the past 25 years, we have confronted two perennial points of tension with regard to GPO:

- OMB's interest in decentralizing the GPO procurement function, and
- Efforts to water down or repeal the collective bargaining rights of GPO employees.

Although they appear unrelated on the surface, we believe those two issues are linked in the OMB agenda to bring about control of GPO by the Executive Branch. For CWA, maintaining the collective bargaining rights of GPO's employees is an absolute commitment. We will oppose any efforts to dilute or disburse those rights from any source.

In the 1970s, a congressional ad-hoc committee of citizens was assigned to examine the need for changes to Title 44. We met over the course of several months and eventually filed our report with the Joint Committee on Printing.

In the early 1990s, Congress was presented with a proposal by the Clinton Administration under the Government Reinvention initiative. Provisions of that proposal would also have decentralized operations of GPO—a proposal strikingly similar to the one which OMB advances today. And, Congress did exactly the right thing at that time, finding no reason to "fix" an agency which is clearly not broken.

GPO's three fundamental responsibilities are interrelated, not mutually exclusive. They include:

- Handling the printing and publication needs of Congress.
- Providing printing management, procurement and expertise to federal agencies through its procurement function.
- Acting as the superintendent of documents through the Federal Depository Library Program.

The current proposal by the Office of Management and Budget would remove just one of those functions by decentralizing the printing and procurement process for 130 federal agencies. However, the practical result would be devastating to the agency's capabilities to continue to meet its remaining two responsibilities.

GPO currently handles over \$425 million worth of contracts with commercial printers on behalf of 130 federal agencies. The procurement process is transparent, provides a standardized competitive bidding system and one-stop shopping for agency printing requirements. This function does not require appropriations. In fact, the procurement process is yet another "good news" story of innovation and efficiency. As "clients" of GPO, federal agencies are billed for their individual projects, but they are assured of the highest quality service and great opportunities for savings through design and technological efficiencies.

OMB's proposal would result in the loss of that efficiency.

The GPO procurement process enables the federal government to take advantage of economies of scale and to utilize GPO's extensive expertise in printing technologies. GPO printing experts accept responsibility for assisting agencies in design and suggest opportunities for economizing, develop specifications, compete, award and administer contracts, conduct follow-up press inspections, quality control reviews and review bills once a job has been delivered.

By far, the most significant damage resulting from OMB's proposal would be the effect it would have on GPO's capability for ensuring citizen access to government information.

For GPO, dissemination of government documents is a non-partisan, virtually automatic process which has been enhanced in recent years by expanded reliance on the internet and other new technologies. That function is consistent with constitutional ideals, democratic principles and the purposes and functions of Congress.

Intuitively most Americans understand that the separation of powers, so fundamental to our democracy, is based on common sense. The functions of the Executive, Legislative and Judicial sometimes overlap and cause tension or conflict. However, this OMB proposal is not an accidental overlap or "gray area." It actually represents an intrusion on the congressional prerogative and interest in maintaining and assuring the free flow of government information.

Recent history proves that the Executive Branch is, at best, disinterested and often obstructionist when it comes to disseminating information, even when that information is neutral or innocuous. Long before--and frequently since--Watergate, the Executive Branch has resisted sharing information and release of government documents. We see this proposal as another opportunity to erect barriers to the free flow of information.

It is instructive to look at the current difficulties of another congressional agency, the Government Accounting Office (GAO), in its efforts to secure information from the White House regarding meetings between the vice president and his “energy task force” and several major contributors to the Bush presidential campaign. Despite a series of judicial rulings upholding GAO’s right of access to Executive Branch documents, the White House has continued to resist and delay.

This Administration in particular has constructed an elaborate defensive web of secrecy that we see as a threat to healthy democracy. Although the White House often cites reasons of national security as an excuse for withholding information, the extensive reach of these secrecy policies, many of which were developed long before September 11th, shows that they are more likely to be exercised to block legitimate inquiries into questionable actions by the Executive Branch as it tries to advance its political objectives.

In fact, last October, Attorney General John Ashcroft issued a little-noticed memorandum advising federal agencies to virtually stonewall Freedom of Information Act requests and assuring that the Department of Justice would provide legal support for their efforts. Among the FOIA exemptions that the Attorney General’s memorandum cites as defensible for refusing to provide information was to “protecting sensitive business information.”

In light of the recent Wall Street scandals and congressional interest in ferreting out wrong doing by corporate executives, such instructions could understandably be interpreted as a license to withhold important information. That would certainly stymie the loud demands for justice that have issued from the public over these scandals.

We believe Congress must not enable the Executive Branch to compromise or further dilute the government’s information distribution functions.

The Federal Depository Library Program predates the creation of GPO by about half a century. Federal depository libraries are designated by members of Congress or by law. They include college, university and law libraries. Today, this program serves and estimated 9.5 million people a year. GPO has forged a tight bond with that process by providing documents, reports, books and other data in print, microform and CD-ROM formats and through its online GPO Access web site. This program, too, would be jeopardized by any dilution of GPO’s responsibilities.

For all of these reasons, we submit that the proposals contained in FAR Case 2002-011 RIN 9000-AJ51 based on Office of Management and Budget (OMB) Memorandum M-02-07 “Procurement of Printing and Duplicating Through the Government Printing Office” (GPO) (May 3, 2002) should be rejected.

Thank you.

#



"Chris Ryan"
<xgbe@yahoo.com>
12/15/2002 09:30 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1365

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Chris Ryan
320 S Hill Ln
Chesapeake, VA 23322
USA



"Bob Brown"
<rcbrown@lunet.edu>
12/13/2002 04:18 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1366

Dear GSA,<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />

I am writing to voice my concern with, and opposition to, the **"FAR Case 2002-011"** and the negative impact I see it having on the continued provision of easy, and relatively complete, access to U.S. Government publications through the Government Printing Office and the Federal Depository Library Program. Without these agencies working under the authority of Congress to systematically retrieve, print, catalog and distribute government documents there is going to be a large drop in the amount of tax-payer funded information readily available to the citizens who pay for it.

Another concern is long-term access to government information. With government pressure on agencies to provide more of their information in electronic formats there comes an increased risk of loss of data that has traditionally been widely distributed and available in paper and microfiche formats that have relatively long and stable life spans. For the past several years GPO and the FDLP have been working cooperatively with other government agencies and educational institutions to insure that permanent copies of electronic publications will be maintained for perpetual public access to this information. Without the central role of GPO in this process it is unlikely that many of these materials will be available to future researchers and citizens.

Please place your support squarely behind the efficient and ubiquitous system that is currently in place. The GPO and FDLP have a long and trusted reputation for providing publicly funded government information in many formats and in a timely manner. Let us not lose track of this fine service to the public.

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Delia_Emmerich@ios.d
oi.gov

12/13/2002 04:19 PM

To: farcase.2002-011@gsa.gov, Linda.nelson@gsa.gov
cc: Debra_Sonderman@ios.doi.gov, Pat_Corrigan@ios.doi.gov,
G_Marvin_Savoy@nbc.gov
Subject: FAR Case 2002-011

Department of the Interior would like to submit the following comments on FAR Case 2002-011, Procurement of Printing and Duplicating Through the Government Printing Office:

1. A definition of "printing" would be very helpful in order to distinguish it from duplicating, copying, and so forth, especially since OMB's May 3 memorandum mentions duplicating and the FAR coverage does not.
2. A definition for "related supplies" would be similarly useful. Do the new rules apply to paper? toner cartridges? computer printers?
3. The reference in the proposed FAR 8.801(a)(3) to "an exception to competition" is ambiguous. Does this refer to a FAR Part 6 competition exception (i.e., full and open vs. restricted competition), or to one of the exceptions to public-private competition contained in OMB Circular A-76?
4. The proposed FAR 8.801(b)(1) seems to be an unnecessary restatement of general policy.
5. We believe that the requirement to synopsise all printing purchases over \$2,500 (proposed FAR 8.801(b)(2)(i)) will prove to be unworkable. Most printing products are required to be completed in very short time frames. Synopsizing will unacceptably lengthen the time that it takes to produce a printed product.
6. Similarly, the requirement proposed in FAR 8.801(b)(2)(ii) that all schedule contractors be given an opportunity to compete for every order will be burdensome for agencies and unrewarding for contractors. It was our experience during the initial implementation of electronic commerce that large numbers (e.g., more than 100) of offers for relatively small purchases unreasonably raised contractors' expectations and provided buyers with a burdensome evaluation workload. We recommend that at least some geographic limitation be permitted. Our preferred approach would be to allow the gathering of only three offers between \$2,500 and \$25,000.
7. It is unclear how Federal Prison Industries (FAR 8.6) and the JWOD program (FAR 8.7) will fit into the process once GPO's role is reduced. It is foreseeable that they would be very interested in pursuing this line of work, with the potential result being little practical freedom of choice for contracting offices and little business opportunity for commercial contractors.
8. The clause proposed at FAR 52.208-XX is too open-ended. To provide at least minimum protections for the commercial contractor, GPO should be required to place their order by a specified date in order to receive the same price as the agency's printing job. Without a cut-off date, the contractor would conceivably be required to maintain a file copy of every job indefinitely in case GPO should ever ask for one.
9. It is unclear how and when coordination of such things as assignment of a library identification number by the Superintendent of Documents will occur. For example, will copies paid for by the agency not contain the number? If so, then will copies paid for by GPO contain the number, with any additional expense being borne by GPO?
10. More precise contact information within GPO would facilitate implementation a great deal.



"Michael Welch"
<mwelch@bu.edu>

12/13/2002 04:15 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1368

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Michael Welch
9 Cygnet Street, Level 1
Brighton, MA 02135
USA



"Quentin Thomas"
<qthomas@jantec-inc.
com>

To: farcase.2002-011@gsa.gov
cc:
Subject: GPO Outsourcing

1369

12/13/2002 04:17 PM

TO WHOM IT MAY CONCERN

This note is in support of outsourcing work currently being done by the GPO. Within the commercial sector there are more than adequate resources to support any printing needs identified within the federal government. My 30 years of government service identify very few areas where GPO support is mandatory. Therefore, fair and open competition should be allowed for Government commercial printing.

Our company, JANTEC Inc. currently does work under federal contract that is far more sensitive than commercial printing. As required, our personnel have also been granted clearances for sensitive type of work.

Competition is always the best way to determine the appropriate service provider. It also always saves the taxpayer money.

Quentin M. Thomas
JANTEC, Inc
Executive Vice President

1370



"Bob Willard"
<bwillard@NCLIS.gov>
12/13/2002 04:31 PM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: FAR Case 2002-011 - Comments (Printing and Duplicating through the Government Printing Office)

The National Commission on Libraries and Information Science (NCLIS) is not submitting a formal comment on the proposed FAR amendment dealing with procurement of printing and duplicating (FAR Case 2002-011). The Commission has a number of vacancies and, as a body, has not considered the FAR amendments. Moreover, as a result of budgetary cuts and other priorities, the Commission has not had the staff resources to examine the proposal with the careful attention it requires.

However, as Executive Director of the Commission, I would like to provide some personal observations to which you may or may not wish to give weight. In various capacities, I have been involved in matters affecting the Government Printing Office (GPO) – especially those having to do with affording access to public information – since 1977.

This submission is made with the concurrence of NCLIS Chairperson, Martha Gould. For the record, I would like to quote what Mrs. Gould submitted to the Senate Rules Committee on October 3, 2002 in testimony regarding the nomination of Bruce James as Public Printer.

I cannot ignore in my testimony one of the most significant policy issues facing Mr. James immediately upon his appointment, although I do not intend to address it at any great length – that is, the recent memo from the Director of the Office of Management and Budget regarding agency printing. The Commission has not examined the issue thoroughly and it cannot comment on the claims for increased savings if agencies procure printing without going through GPO. Personally, I wonder if each agency will be able to develop the expertise already present in GPO's procurement operation. I am concerned that prices charged by individual printers will increase as they augment their sales staff to deal with a multitude of purchasing agents throughout the government. I am especially concerned that bypassing GPO will lead to a massive increase in the problem of fugitive documents. Finally, I question how OMB can direct agencies to ignore statutory law based on a single legal opinion from the Department of Justice. It seems to me that either a court has to rule the law invalid or the legislative process, involving the Congress with approval by the President, has to replace the existing law that requires agencies to use GPO as their source of printing. In any event, the Commission will make itself available to work with GPO, OMB and the Congress to address issues raised in the OMB memo if it is so desired.

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I would caution the FAR Council, as well as the Office of Management and Budget, to delay implementation of any changes to the status quo until a much fuller examination of the premises on which the proposed changes are based could take place. The stated goals – “induce competition, save taxpayer money, and promote small business opportunities” – are all worthwhile, but no real evidence has been put forth that the proposed changes will accomplish these goals. Indeed, statements to the contrary, i.e., that competition will be reduced, that costs will rise, and that small business opportunities will disappear, have been put forth by credible commentators.

Statements of opinion, of course, are only that: opinion. Such statements usually carry a certain amount of ideological baggage. In floor debate within Congress, various positions have been staked out. Arguing for a strong central role, a Representative from Ohio claimed, “There is no reason why this government should not execute its printing by its own officers, and its own employees, any more than it should not carry on war by its own soldiers....” A Representative from Vermont, voiced serious doubt about the ability of the government to handle printing, or anything else for that matter! He said, “I am ready to vote for any measure which will have the effect of working a reform in this printing business.... But, Mr. Speaker, I give notice that every vote which I shall give on the subject, I shall give under this protest, that whatever we do I expect we will be cheated.... The government cannot build a capitol, it cannot build a custom-house, it cannot build a court-house, it cannot build a ship, it cannot make a musket—why, sir, it cannot even run a horse and wagon which carries the mail, without paying twice, thrice, and four times as much as anybody else will pay.”

The references to muskets and horse and wagon give a hint that this debate did not take place recently. In fact, the debate occurred on May 31, 1860 as the House considered, and eventually passed the original bill that would create the Government Printing Office. Ironically, it was from a growing dissatisfaction with contract printing that the proposal for an internal printing capability arose. A Representative from New York, a member of the Committee on Public Expenditures, argued, “Now, sir, the gentleman from Alabama asserted that, under the contract system, a saving would accrue to this Government. That statement is refuted by the evidence adduced before our committee, by which it appears that, under the contract system, which existed from 1846 to 1852, the work was done in a poorer manner, and at a greater cost.... The contract system has been tried, and it has proven to be a failure.”

(It is also worthy of some note that at least one Representative was wary of a Constitutional issue that would still be troubling people nearly 150 years later. A representative from Virginia stated his objection, “that the Superintendent of this [proposed] printing establishment is an appointee of the Executive, and yet it is proposed that the Committee on Printing of the two Houses shall

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retain a supervision of the contracts made. Now, I am opposed to any committee of the House, or of the Senate, holding such a relation as that to this matter. That is an executive function, and such a provision is violative of the clear division of power called for by the Constitution.”
Despite his objection, the legislation passed.)

I do not make reference to this ancient debate to argue in any way that positions held then in mid-nineteenth century should influence our decision making in the twenty-first century. Rather, I use it to remind us that opinions, long ago or right now, are easily stated. More difficult is the collection of facts to underpin the opinions. Much has been claimed about competition, savings and small business, both in support of the proposed amendment and in opposition. But I am not aware of real hard evidence to support these claims, and I believe it should be developed before enacting any change in policy.

In addition, it should be remembered that new leadership has just been put in place in the Government Printing Office. Bruce James, the Public Printer of the United States, is a strong advocate of competition, tax savings and small business. He should be given the opportunity to resolve the issues driving the FAR amendments, without facing a revolutionary *fait accompli* as he walks through the door.

Restating what Mrs. Gould offered in her testimony regarding the nomination of Mr. James, I want to emphasize that NCLIS is willing to work with GPO, OMB and other interested agencies to help accomplish a just resolution of the controversy regarding government printing. The Commission has demonstrated its capacity for dealing with government information issues over the past 32 years since it was established. Most recently, NCLIS has prepared for Congress “A Comprehensive Assessment of Public Information Dissemination” which puts forth a number of recommendations, some broadly strategic, some highly focused, dealing with GPO and the overall information dissemination programs of this Nation.

The members of the Commission are especially mindful of the issue of access to government information. A nation that governs itself must take steps that assure the governors, i.e., the citizens, have access to information on the operation of their government. The Depository Library program is a cost effective way of ensuring such access, but it is far from clear that the proposed FAR amendments will do much to maintain or improve the operations of that program. I happen to believe that the opposite will occur, that less public information will be made available. I hasten to add: that is my *opinion*. Before any new policy in this sensitive area is made precipitously, I would urge further study. If there is any way the National Commission on Libraries and Information Science can be helpful, just let me know.

1370

Robert S. Willard

Executive Director

National Commission on Libraries and Information Science

1110 Vermont Avenue, NW, Suite 820

Washington, DC 20005-3552

Phone: 202-606-9200

Fax: 202-606-9203

Email: bwillard@nclis.gov



"Justin Darby"
<jdarby@powercom.ne
t>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 04:30 PM

1391

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Justin Darby
2414 S. Chicago Ave.
South Milwaukee, WI 53172
USA



"Krista Ainsworth"
 <kainswor@norwich.edu>

To: farcase.2002-011@gsa.gov
 cc:
 Subject: FAR Case 2002-011

1372

12/13/2002 04:42 PM

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program. The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that our citizens have current, comprehensive, and permanent access to the federal government information they need. GPO plays a critical role in providing valuable government information to the public, and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information.

OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendment ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for

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providing copies to the Superintendent of Documents. Further, the proposed language allows agencies to provide GPO with publications in unusable or inappropriate

formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means."

Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive

to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software).

The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to

use (for example, a 2,000 page report issued as 300 separate PDF files).

Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is

inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal

requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would

allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the

Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and individuals

depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide

for a continued, cost-effective Sales Program. Federal law gives GPO primary

responsibility for providing public access to federal government information

through the FDLP and the Sales Program. Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for

future use. Information professionals say that this system provides "permanent public access" to federal government information. Today, the

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Superintendent of Documents provides reliable, efficient, cost-effective and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you very much for your consideration.

Krista Ainsworth
Mack Librarian for Special Collections
Kreitzberg Library
Norwich University
Northfield, VT 05663



"Nathan Bowman"
<Emperor_Speed@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 04:56 PM

1373

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Nathan Bowman
330 N 8th St
Akron, IA 51001
USA



"Unger, Ann"
<UNGERA@dmclaw.com>

12/13/2002 05:20 PM

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: Proposed FAR Amendment: FAR Case 2002-011

1374

Director Mitchell E. Daniels Jr.
Office of Management and Budget (OMB)
RE: OMB Memorandum No. M-02-07:Procurement of Printing and Duplicating through the Government Printing Office (GPO) FAR Case 2002-001

Dear Director Daniels:

As a professional librarian for a law firm, I am writing to urge reconsideration of the OMB's proposed amendments to the FAR that would allow agencies to procure their own printing outside of the GPO.

The Superintendent of Documents and the Government Printing Office and its Federal Depository Library Program (FDLP) play a critical role in ensuring that this access is equitable, effective, efficient, dependable and available in permanent and readily accessible formats. I have a great appreciation of the SuDocs' and GPO's strong, centralized, coordinated and managed organization. It has greatly expedited my research. I believe that these amendments would adversely impact the SuDocs and GPO and will result in the public being hindered in its need for access to Government information.

Some of my concerns are as follows:

1) The proposed amendments are a clear violation of 44 U.S.C. §501 since they authorize agencies to procure their printing outside of GPO

2) In addition to violating 44 U.S.C. §501, the proposed changes to the FAR violate other Title 44 provisions that neither OMB nor the Department of Justice have ever challenged as unconstitutional:

· §1903 that requires agencies who procure outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries. The FAR proposal that the Superintendent of Documents (SuDocs) would bear these costs is contrary to current law and unduly burdensome to management.

§1710 that requires agencies to supply a copy of all publications to the SuDocs for cataloging purposes. How this might be achieved on a comprehensive basis under the proposed FAR is very unclear and is likely to result in "lost" documents.

3) While attempting to solve the fugitive documents problem, agency responsibilities in the proposed FAR are so vague that the result will be more fugitive publications, not fewer.

4) A strong system of coordination, including an effective and transparent system to bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The proposed FAR does not create such a system, choosing instead to leave a void in the place of the current effective structure. It is critical to understand that the public still needs print access to materials -- not all is easily gathered or comprehended in strictly electronic formats.

5) The proposed FAR does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the SuDocs. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

Again, I urge you to reconsider these proposed amendments. (Note: My comments do not necessarily represent those of my employer, which has taken no official position on these amendments, but they do emerge from my experiences as a legal researcher and private citizen who has benefited from the current



"Brian Dunn"
<valhallaone@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 05:54 PM

1375

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Brian Dunn
2160 Lawrence St
Apt. 2N
Saint Louis, MO 63110
USA



jrelton
<jrelton@afb.net>

12/13/2002 05:06 PM
Please respond to jrelton

To: farcase.2002-011@gsa.gov, 011@gsa.gov.
cc: "Paul Schroeder" <pws@afb.net>
Subject: RE: FAR Case 2002-011

1376

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

RE: FAR Case 2002-011

The American Foundation for the Blind, AFB, is pleased to submit Comments in response to the November 13, 2002 Notice of Proposed Rule which makes changes to the Federal Acquisition Regulation; Procurement of Printing and Duplicating through the Government Printing Office (GPO). The proposed changes would provide for competition for printing contract requirements for government agencies rather than the exclusive use of the Government printing Office to fulfill government printing requirements. Under these procedures, agencies would be required to follow competitive bid processes for printing contracts in excess of \$2,500. These changes raise a variety of questions Relative to the requirements of section 508 of the Rehabilitation Act (67 Federal Register 43524).

The mission of the American Foundation for the Blind, Helen Keller's cause in the United States, is to help people who Are blind or visually impaired achieve equality of access and opportunity that will ensure freedom of choice in their lives. Since 1921, AFB has pursued the dream of a world where the major inequities faced by blind or visually impaired people are eliminated or substantially reduced. Today, AFB continues as the nation's leading resource for people who are blind or visually impaired, their families and the professionals who serve them. AFB has a long history of involvement with Section 508 from the drafting of original amendment language to its membership of the Electronic and Information Technology Access Advisory Committee. AFB is working as a stakeholder on the Accessibility Forum and serves on its Strategic Council and its Interoperability Project Team.

Section 508 of the Rehabilitation Act, as amended (29 U.S.C. 794d), requires the Federal Government to buy electronic and information technology (E&IT) that is accessible to government employees and, in some cases, private citizens with disabilities. In April 2001, the Defense Acquisition Regulation Council and the Civilian Agency Acquisition Council (together, the Councils) published regulations implementing the Section 508 amendments, to go into effect two months later. In a speech at the Pentagon, President George W. Bush marked the occasion by designating Section 508 as an Administration priority, emphasizing its importance in helping to achieve his vision of treating Americans with disabilities as people to be respected, rather than problems to be confronted. We strongly support the President's commitment to this program. AFB has worked and continues to work with committed individuals both inside and outside the government to help make the President's vision a reality.

Summary

The Federal Acquisition Regulation (FAR) Council proposes to change its regulations consistent with OMB Memorandum M-02-07, to induce competition, save the taxpayer and promote small business opportunity,

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by providing for competitive process to find the best value for agency printing procurements. Under these procedures, agencies would be required to use competitive processes to procure printing jobs costing in excess of \$2,500 and to otherwise find the best value by considering private and governmental sources. The changes further claim to improve depository library systems by taking concrete steps to ensure that all documents are provided to the GPO superintendent of documents for distribution to the depository libraries.

ISSUES:

We have concerns about the proposed changes to the regulations which we believe need to be addressed.

. Who will be responsible for providing the accessibility required by Section 508 and other relevant laws?

. What are the concrete steps to ensure that documents are provided to the GPO superintendent of documents and the Federal Depository Libraries?

. What time frame is provided for in these concrete steps and how will the public be assured that these documents are provided in an accessible format to the superintendent and subsequently to the depository libraries?

. What are the enforcement provisions for these proposed rules to assure that the deliverables meet the section 508 requirements? I.e. who has standing and to whom would persons address complaints?

. What are the enforcement provisions to ensure that the deliverables are provided to the GPO and to the Federal Depository Libraries? I.e. who has standing and to whom should they address any complaints?

The following are comments and solutions to the questions posed which we believe address are concerns and should be likewise addressed in any changes to the FAR.

Since these procurement contracts for printing are subject to all procurement statutes and regulations including section 508 of the Rehabilitation Act, all documents/printed products must provide comparable access for disabled persons to that afforded persons without disabilities. We believe that the proper way to provide such comparable access is to create in the documents/products with the accessibility built into the original product. To the extent that the documents are created electronically, and we believe this should be all documents, they must be compliant with the Section 508 standards. The Federal Government has made great strides in learning to develop accessible documents, and web pages over the past year and-a-half. There is still room for improvement.

Our concern is that, the disabled community would be denied access to information while the contractors develop the necessary expertise to provide access or, that any access which would be provided would not be comparable to the provided to persons without disabilities. We believe that the contractors should be required to provide the accessibility and not have such accessibility built in retroactively. Providing accessibility retroactively would cost the government and therefore the tax payers more money and serve to delay our access to information thus not giving us comparable access. We believe that all electronic documents should contain structural mark-up and flexible presentation technology such as ANSI Z39.86-2002. (See <http://www.loc.gov/nls/z3986for> further information.) This technology

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provides a foundation for easy creation of textual, auditory, combination of textual and auditory, easily translated into Braille, and allows for the inclusion of graphics and pictures as well. We believe that this technology achieves the goal of section 508 and this administration by respecting disabled persons' needs and not treating them as problems to be confronted. By creating documents which are designed in an accessible format disabled persons can be assured prompt, effective access to their government's documents in a timely and appropriate manner along with other citizens thus ensuring that our government achieves the best value for the tax dollar.

We are concerned if attention to proper design is not given these documents would be presented on web pages in some format which does not provide comparable access to disabled persons such as Portable Document Format (PDF). Earlier this year the AFB joined to other blindness organizations in developing a whitepaper which outlines our concerns about the use of PDF's as a method of achieving 508 compliance. This document can be found at <http://www.afb.org/aboutpdf.asp>. It is also attached for your convenience. Some of the problems with PDF presentations are that they do not afford the general disabled public comparable access since this format is dependent on a specific operating system/platform, a specific version of assistive technology, thus placing a heavier economic burden on a population which already has a 70% unemployment rate, and because there are problems in creating the PDF documents which can result in an inaccessible version or one that blocks access because of permission settings within the security levels set by the author of the document. If documents are created using a technology such as that provided by the ANSI Z39-86-2002, the documents are not operating system or platform dependent and can easily be converted into audio recording or Braille formats.

We applaud the GPO's long history of providing accessible copies of its documents on the web even before the passage of section 508. Today, even though, unlike federal agencies, it is not required to do so under Section 508 of the Rehabilitation Act, GPO continues to provide access to its documents without the use of PDF's. In addition, the GPO has recently taken steps to add the ability to create accessible publishing formats to its list of core competencies. Again, this is beyond its legal responsibility. WE believe that it would not be in the best interest of the tax payers to divert printing jobs to other sources which do not have this competency and for whom this would mean additional time to develop the skills and create additional costs to the contractor. In short, it has taken a long time to gain what level of competency there is to provide access to E&IT, we don't believe that the tax payers, specifically disabled tax payers, will receive the best value if we have to take steps backwards in gaining access or stand still while contractors get up to the level of expertise already possessed by the GPO.

We are also concerned about the enforcement of these proposed regulations. What enforcement safe guards are there to assure that the E&IT is accessible and further that these deliverables are, in fact, provided promptly to the GPO and to the Federal Depository Libraries? Rights with remedies will afford the disabled community nothing more than empty assurances.

Another concern relates to whether copies of the documents procured by agencies would be provided to the Superintendent of Government Documents immediately upon their completion. If the copies are not provided promptly the public access would be delayed since they would not be able to be posted on the GPO web site or placed in the depository libraries throughout the country. If documents are not promptly provided then the

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public could not become aware of agencies activities or provide comments and raise concerns. If the documents which are provided to the Superintendent of Government Documents are not created in an accessible format, it would mean an additional burden to the Superintendent, and disabled persons would not have comparable access due to any delays and their rights as tax paying citizens would not be respected. This would not achieve the Administration's goal of treating persons with disabilities with respect and not as problems to be confronted. It would also not be the best value for the tax payer dollar.

Thank you for your attention to these concerns. We are certain that these issues will be addressed by the final changes in the regulations and look forward to a reflection of these in the subsequently published final regulations.

Sincerely Yours,

Joy Relton,
Governmental Relations Representative
American Foundation for the Blind
820 1st Street NE Suite 400
Washing, DC 20002
202-408-8170
jrelton@afb.net



"Tom Zacharoff"
<wih3p45p02@sneake
mail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 06:18 PM

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Tom Zacharoff
5736 El Cabo Court
San Diego, CA 92124
USA

1377



"Kathy Edwards"
<kedwards@clan.lib.nv.us>

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc: "senator@ensign.senate.gov" <senator@ensign.senate.gov>,
"mail.gibbons@mail.house.gov" <mail.gibbons@mail.house.gov>
Subject: FAR Case 2002-011

12/13/2002 06:43 PM

I am writing in opposition to the proposed Federal Acquisition Regulation published in the Federal Register Vol. 57, No. 19, 11/13/02, pages 68914-8. They claim that these changes in the regulation will "induce competition, save taxpayer money and promote small business opportunities" when the opposite is true. They even make the claim that it will reduce the number of fugitive documents, which is ludicrous.

The Government Printing Office has been doing the business of getting the documents of the United States printed for many years and they know what they're doing. This cannot be said of the individual government agencies. Printing is a business that needs a certain degree of expertise behind it and that level of expertise is not available in other agencies. It shouldn't be, because that would not be cost effective. The Office of Management and Budget claims that the executive agencies could save over \$50,000,000 a year by negotiating their own printing, but that doesn't make it true and they did not offer any real evidence. I did not see any statement such as the GPO charged \$20,000 for this printing job and XYZ would have done the same for \$18,000. I don't think they have any real numbers to base their assertion on and I don't think they know anything about the business of printing like GPO does.

I also don't think this change would promote small business opportunities. The GPO contracts out most of their printing jobs to small businesses and it is much easier for them to have to submit bids to one agency than it would be to keep track of all government agencies. Most small businesses would not have the staff or funds to pursue government printing contracts if they had to keep track of what all the agencies were doing and the different procedures for each agency. I do not believe that the GPO is the "monopoly" depriving businesses of open competition that the OMB claims they are. I believe they are a centralized point for businesses to offer competitive bids on all government printing jobs.

The worst problem I see is with the proposed distribution of documents to depository libraries. There is lip service paid to this issue when it says that they recognize fugitive documents are a problem and there may or may not be a clause in potential contracts requiring the printer to submit one copy of each Government publication to the Superintendent of Documents, preferably using electronic means. This is in violation of U.S. Code Title 44, Section 1903 which states "The cost of printing and binding those publications distributed to depository libraries obtained elsewhere than from the Government Printing Office, shall be borne by components of the Government responsible for their issuance; those requisitioned from the Government Printing Office shall be charged to appropriations provided the Superintendent of Documents for that purpose." To be in compliance with the law, the agency would have to pay for all of the copies for depository libraries and send them to the GPO to be distributed. Whether there is or isn't a clause requiring printers to furnish GPO with copies of documents, there does not seem to be any plan to ensure compliance with the clause. An example of how well this method does not work for the depository system, is the National Institutes of Health Printing Program. In 1988 they were given authority to publish outside the GPO but were required to provide sufficient copies to the GPO for depository libraries. As a result, well over half of their publications have become fugitive documents. I would really hate to start getting less than half of the documents that we now

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receive from the Department of Defense, GSA and NASA.
Please reject the proposed amendments to the FAR as they would lead to greater costs for printing and distribution of documents, make it harder for small businesses to compete for printing contracts and most importantly, would lead to a greater number of fugitive documents.

Sincerely,
Kathy Edwards
Federal Publications Librarian
Nevada State Library and Archives
100 N. Stewart St.
Carson City, NV 89701
(775) 684-3329
kedwards@clan.lib.nv.us

These are my opinions and do not necessarily reflect the opinions of the Nevada State Library and Archives.



"Ronald Morley"
<rmorley@core.com>
12/13/2002 06:47 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1379

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Ronald Morley
17973 M-40
Gobles, MI 49055
USA



"Russell Pearce"
<gppearce@socal.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 07:19 PM

1380

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Russell Pearce
7685 Trask Ave. #B
Westminster, CA 92683
USA

1381



"Karla Castetter"
<karlac@tjssl.edu>

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc: "baish@law.georgetown.edu" <baish@law.georgetown.edu>
Subject: farcase.2002-011

12/13/2002 07:27 PM

This comment is submitted as a strong objection to the proposed amendment to the Federal Acquisition Regulation (FAR Case 2002-011), published in the Federal Register, Vol. 67, No. 210, November 13, 2002, 68914-8.

I serve as a Professor of Law and Library Director at Thomas Jefferson School of Law in San Diego, California. As a small, private law school, we serve students, faculty, alums and members of the public, all of whom need current and ready access to Federal information. The FAR amendments would substitute a myriad of publishers for the Government Printing Office. The GPO has served public and special libraries, like the Thomas Jefferson School of Law Library, very well, and at a reasonable cost during the 29 years I have worked as a law librarian. At a time when many of the more affordable publishers have been acquired by international conglomerates which charge premium prices, the GPO has remained as a reliable and affordable source for federal information. The proposed amendments, which authorize agencies to procure their printing of public materials outside of the GPO, violate 44 U.S.C. section 501. In addition, the FAR proposal violates section 1710, which requires federal agencies to supply a copy of all publications to the Superintendent of Documents. Law librarians need to obtain primary and official legal materials in both print and electronic formats from a reliable source. The GPO is this reliable source. If librarians would need to purchase the same materials from several private publishers, the cost would undoubtedly be more than the GPO cost and the continuity of form and substance would be lost. Libraries which have a duty to maintain archival copies would have multiple challenges and extra hours of staff time just to enter the subscriptions, track title changes, gaps in coverage, claims and the inevitable lapse of publication by the new publishers because of a slim profit margin. In summary, I sincerely urge the Office of Management and Budget to abandon the FAR Case 2002-011 amendments.

Prof. Karla Castetter
Library Director
Thomas Jefferson School of Law
2121 San Diego Avenue
San Diego, CA 92110
(619) 297-9700 ext. 1110
karlac@tjssl.edu



"David Heiniluoma Jr."
<eff@djheini.com>
12/13/2002 07:34 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

138-2

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

David Heiniluoma Jr.
7 Sycamore Cir
Millbury, MA 01527
USA



"Frank Clowes"
<fkci@iname.com>

12/13/2002 08:33 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1383

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Frank Clowes
445 Market St.
Leechburg, PA 15656
USA



"Rex Fujikawa"
<rfujikawa@yahoo.co
m>

12/13/2002 08:58 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1384

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Rex Fujikawa
101 Rock Oak Court
Walnut Creek, CA 94598
USA



"Khan Sovithy"
<sovithy@hotmail.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 10:15 PM

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Khan Sovithy
236 St. 376 Boeung Keng Kang 3
Khan Chamkarmon
Phnom Penh, 855
Cambodia

1385



"Matthew Chambers"
<method3411@aasp.n
et>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 10:59 PM

1386

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Matthew Chambers
15 Davis Ave
Attleboro, MA 02703
USA



"eric freemantle"
<jg24@direcway.com>
12/14/2002 12:33 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1387

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

eric freemantle
139 Quarry Ln
Swanton, VT 05488
USA



"Val Trullinger"
<gargantua@pantagru
el.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/14/2002 12:50 AM

1388

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Val Trullinger
1014 1/2 E. Almond Ave.
Orange, CA 92866
USA



"Chandler Morgan"
<Reknall@ev1.net>
12/14/2002 04:09 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1389

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Chandler Morgan
2211 W North Loop Blvd Apt 134
Austin, TX 78756
USA



"Amy Fuelleman"
<fuelev@terra.com.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/14/2002 08:39 AM

1390

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Amy Fuelleman
911 Laurie Dr.
Madison, WI 53711
USA



"Justin Bassett"
<Shadowslayerz@aol.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/14/2002 10:19 AM

1391

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Justin Bassett
1328 West 5th Street
Anderson, IN 46016
USA

1392



"thomas colburn jr
ww11 vet"
<hawk_777us@yahoo.
com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/14/2002 01:46 PM

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

thomas colburn jr ww11 vet
118 miss ellie circle
Belton, MO 64012
USA



"David Caldwell"
<david+eff@porkrind.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1393

12/14/2002 01:58 PM

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Caldwell
10421 Lampson Ave
Garden Grove, CA 92840
USA



"Jesse Michael"
<jdm@europa.com>
12/14/2002 02:29 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1394

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jesse Michael
2346 NW Glisan #34
Portland, OR 97210
USA



"John Stanton II"
<reachjt@cox.net>

12/14/2002 03:13 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1395

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Stanton II
3865 Wilcoxson Dr
Fairfax, VA 22031
USA



"Jean-Philippe
Langlois"
<jpl@iname.com>

12/14/2002 06:04 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1396

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jean-Philippe Langlois
2041 W Hebron Pkwy
3235
Carrollton, TX 75010
USA



"Alok Khanna"
<akhanna@choler.net>

12/14/2002 07:17 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1397

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Alok Khanna
16410 84th Ave
APT 6C
Jamaica, NY 11432
USA



"Allen Waddell"
<arayw63@wmconnect.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/14/2002 07:31 PM

1398

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Allen Waddell
430 N Oakgrove Ext
Millers Creek, NC 28651
USA



"Holly Mitchell"
<hol31@umit.maine.ed
u>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/14/2002 08:48 PM

1399

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Holly Mitchell
31 B Margin Street
Orono, ME 04473
USA



"Michael Hubbard"
<michael@offroadgeek
.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/14/2002 09:06 PM

1400

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Michael Hubbard
3075 Blaine St
Miami, FL 33133
USA



"Kelly Smythe"
<crownmcsi@bellsouth.net>

12/13/2002 11:40 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: GPO Reform

1401

Crown Management Services, Inc. supports the Administration's efforts to reform government monopolies, such as the overnment Printing Office (GPO) which unfairly penalize the American taxpayer and our nation's businesses and sacrifice government efficiency.

Crown is a small business that has been in the Government services contracting industry for over 40 years. We are located in Pensacola Florida and currently have contracts with the Federal Government in seven states and the Azores.

The proposed rule seeks to encourage competition, save taxpayer money and promote small business opportunities by eliminating restrictions that mandate the use of GPO as the single source and frees agencies to select printing from a wide array of sources that can demonstrate their ability to meet the government's needs most effectively.

The government should rely upon the private sector to provide goods and services necessary for the operation and management of federal agencies and departments. Outsourcing reduces the size of government and increases efficiency by limiting government to performing its core mission functions.

While GPO does currently contract a portion of the government's printing to the private sector, greater savings can be achieved by giving federal agencies explicit authority to obtain the best value it can for taxpayer dollars. Therefore, we support the proposed GPO reform.

Sincerely,

Kelly Smythe
Vice President
Crown Management Services, Inc.
1501 N. Guillemard St.
Pensacola, FL 32501



"Darren Leno"
<spam@leno.net>

12/14/2002 09:38 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1402

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Darren Leno
5513 17th st N.
Moorhead, MN 56560
USA



"Brian West"
<brian@bkw.org>

12/14/2002 10:10 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1403

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Brian West
714 E Osage Ave
McAlester, OK 74501
USA



"Todd Provancha"
<provancha@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/14/2002 10:13 PM

1404

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Todd Provancha
14052 35th Ave. NE
Seattle, WA 98125
USA



"Ann Egerton"
<kraken18@hotmail.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/14/2002 10:30 PM

1405

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Ann Egerton
3 Warren Lodge Ct. #2A
Cockeysville, MD 21030
USA



"David Griffin"
<superdave8@woh.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/14/2002 11:34 PM

1406

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

David Griffin
804 Citation Ave
Dayton, OH 45420
USA



"Nicholas Weikel"
<nweikel@attbi.com>
12/15/2002 12:02 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1409

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Nicholas Weikel
8921 Autumnwood Dr
Sacramento, CA 95826
USA



"Ariel France"
<arielfreex@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 12:33 AM

1408

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Ariel France
5751 Camellia ave.
apt.213
North Hollywood, CA 91601
USA



"Larry Blaylock"
<old-pops@excite.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 12:38 AM

1409

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Larry Blaylock
515 State St Apt 17
Saint Joseph, MI 49085
USA



"Patrick Farabaugh,
Sr"
<farabaugh@attbi.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 12:43 AM

1410

December 14, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Patrick Farabaugh, Sr
7209 Percival Way
Stockton, CA 95210
USA



"John Oakley"
<tigerdragonclaw@aol.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 03:12 AM

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Oakley
16413 Nation Rd
Kearney, MO 64060
USA

1411



"Anthony La Cova"
<Antho7477@excite.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 03:16 AM

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Anthony La Cova
1546 82nd St
Brooklyn, NY 11228
USA

1412



"John McMonagle"
<johnm@advocap.org>
12/15/2002 09:23 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1413

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John McMonagle
1131 Lost Dauphin Rd
De Pere, WI 54115
USA



"Brian Greenberg"
<Brian.Greenberg@ear
thcorps.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 11:05 AM

1414

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Brian Greenberg
10328 NE 12th Street
G301
Bellevue, WA 98004
USA



"dennis dively"
<warlockwizd@lycos.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 11:30 AM

1415

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

dennis dively
417 e main st flr 1
Roaring Spring, PA 16673
USA



"Alessandro Abate"
<sandro@mac.com>
12/15/2002 11:37 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Alessandro Abate
1291 Nightingale Ave
Miami Springs, FL 33166
USA

1416



"JAMES SMITH"
<jws1933@tampabay.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 11:46 AM

1417

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

JAMES SMITH
5499 S LANDING TERR
INVERNESS, FL 34450
USA



"Melanie Miller"
<MelanieTM@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 11:54 AM

1418

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Melanie Miller
1189 Congo Road
Wilkesboro, NC 28697
USA



"Alexander Rudyk"
<aref@rudyk.net>
12/15/2002 01:48 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1419

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Alexander Rudyk
1404 Harvard Yard Mail Center
Cambridge, MA 02138
USA



"Richard Shurgalla"
<rshurgalla@easternst
ateselectric.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 02:46 PM

1420

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Richard Shurgalla
81 Hoffman St
Kingston, NY 12401
USA



"Alik Widge"
<aswst16@pitt.edu>

12/15/2002 04:08 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Alik Widge
5600 Munhall Rd
Pittsburgh, PA 15217
USA

1421



"John DeFabio"
<jsd01@comcast.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 05:08 PM

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John DeFabio
16500 Quarry Rd Apt 460
Southgate, MI 48195
USA

1422



"William Sparkman"
<wspark5801@aol.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 05:19 PM

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

William Sparkman
5315 S Y Cir
Fort Smith, AR 72903
USA

1423



"Brody Hurst"
<kagenin@cyberspace.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 06:20 PM

1424

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Brody Hurst
810 Forest Glade Cir
Grass Valley, CA 95945
USA



"Rory Mellinger"
<mellingerr@earthlink.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 07:22 PM

1425

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Rory Mellinger
1700 E Main Apt 116
Kent, OH 44240
USA



"Michael Riskin"
<riskin@excite.com>

12/15/2002 08:03 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1/4/26

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Riskin
20 Lohoma Ct
Hillsborough, CA 94010
USA



"Stephen McMillan"
<mcmillan00@attbi.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 10:27 PM

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Stephen McMillan
30 Federal St
Reading, MA 01867
USA

1427



"Jenny Berger"
<jenny@malleron.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 10:28 PM

14/28

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jenny Berger
5544 White Dove Dr
Arlington, TX 76017
USA



"Zachary Beason"
<beezn@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/15/2002 11:25 PM

1429

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Zachary Beason
823 Esplanade St
Lebanon, IN 46052
USA



"Matthew Agen"
<agenm@rcn.com>
12/16/2002 12:04 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1430

December 15, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Matthew Agen
89 Lake St
Arlington, MA 02474
USA



"Aaron Kurtz"
<hardsund@yahoo.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 04:08 AM

1431

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Aaron Kurtz
2355 Leith Road
Glendale, CA 91206
USA



"Michael Castleman"
<mlc67@columbia.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 05:08 AM

1432

December 16, 2002

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Federal Acquisition Regulation

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Sincerely,

Michael Castleman
1651 Lerner Hall
New York, NY 10027
USA



"Anders Hofsten"
<the_kit@linuxmail.org
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 05:41 AM

1433

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Anders Hofsten
Studidegängen 3-112
Gothenburg, 416 81
Sweden



"dan barkley"
<barkley@unm.edu>
12/13/2002 04:27 PM

To: farcase.2002-011@gsa.gov
cc:
Subject: Proposed FAR Amendments to OMB Memo M-02-07

1434

Dear FAR Secretariat:

Attached are my comments regarding OMB Memo M-02-07.

Thank you for providing me an opportunity to comment.

Sincerely,



Dan Barkley FAR Secretariat.doc

**FAR Secretariat
General Services Administration
Comments on FAR case 2002-011
December 13, 2002**

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Dear FAR Secretariat:

I am writing to you to express my strenuous objections to proposed FAR amendments that the Office of Management and Budget (OMB) intends to implement regarding OMB Memorandum No. M-02-07 (Procurement of Printing and Duplicating through the Government Printing Office) as published in the **Federal Register**, Vol. 67, No. 219, dated 11/13, 2002, pg. 68914-68918. As a Government Information Librarian with a vested interest in the Federal Depository Library Program (FDLP) the impact these seriously flawed proposed amendments would have on the American public and their right to no-fee, permanent access government information would be devastating.

Access to government information is a founding principle of our democratic society. The American public has come to expect unfettered access to information by and about its government in order to participate in the democratic process including holding the government and its officials accountable for their actions. As well, the government has an affirmative obligation to disseminate and provide broad public access to its information, including the guarantee of the information's authenticity and integrity, and that government information will remain in the public domain through continuous, permanent availability and preservation.

The proposed amendments to the FAR are in clear violation of 44 U.S.C. §501. Currently this statute states that "All printing, binding, and blank-book work for Congress, the Executive Office, the Judiciary, other than the Supreme Court of the United States, and every executive department, independent office and establishment of the Government, shall be done at the Government Printing Office..." The arrangement between the print procurement through Government Printing Office (GPO) and the Office of the Superintendent of Documents (SuDocs) who has primary responsibility for the administration of the FDLP has worked well for over 150 years and continues to serve the American public in the best way possible. When agencies adhere to the law and procure their printing through the GPO, the SuDocs determines if that publication meets the definition of a "government publication" as defined in 44 U.S.C. §1901. If, through the determination of the SuDocs, a publication meets this criteria, the SuDocs will "ride" that procurement order so that sufficient number of additional copies will be further deposited to participants in the FDLP and the GPO Sales Program.

The proposed changes to the FAR are also in clear violation of 44 U.S.C. §1903 which states "The cost of printing and binding those publications distributed to depository libraries obtained elsewhere than from the Government Printing Office, shall be borne by

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components of the Government responsible for this issuance..." Accordingly, when agencies procure materials outside of GPO, that agency bears financial and legal responsibility for the costs associated with providing sufficient numbers of copies for depository distribution. The SuDocs is not authorized to bear these costs nor should they be. The FAR amendment proposing that GPO/SuDocs assume these costs is unreasonable, unjustified, and unprecedented in the history of our country's printing and procurement of government information. Additionally these proposed amendments contravene current law.

Recently Congress was most explicit with its strong disagreement with the Administration on the proposed amendments to the FAR by including provisions in the continuing resolutions funding government operations by stating clearly that using any appropriated funds to procure publications outside of GPO would be in clear violation of the law. Public Law 107-294 (H.J. Res. 124) extending funding through January 11, 2003 explicitly states that:

"Sec. 117. (a) The Congress finds that section 501 of Title 44, United State Code, and section 207(a) of the Legislative Branch Appropriations Act, 1993 (44 U.S.C. 501 note) require that (except as otherwise provided in such sections) all printing, binding, and blank book work for Congress, the Executive Office, the Judiciary, other than the Supreme Court of the United States, and every executive department, independent office, and establishment of the Government, shall be done at the Government Printing Office.

"(b) No funds appropriated under this joint resolution or any other Act may be used--

"(1) to implement or comply with the Office of Management and Budget Memorandum M-02-07, 'Procurement of Printing and Duplicating through the Government Printing Office', issued May 3, 2002, or any other memorandum or similar opinion reaching the same, or substantially the same, result as such memorandum; or

"(2) to pay for the printing (other than by the Government Printing Office) of the budget of the United States Government submitted by the President of the United States under section 1105 of Title 31, United States Code."

Another proposed FAR amendment stating that "...specific new actions...to improve dramatically the depository library system by ensuring that all Government publications are in fact made available to the nations' depository libraries" is simplistic and naive. This proposal counters existing statutory language, will likely result in the further degradation of access to government information and in all likelihood increase, rather than decrease as is supposed in this proposal, "fugitive" government documents.

In today's environment, agencies that procure printing outside the purview of GPO or print in-house have neither economic incentive nor enforcement mechanisms in place to ensure these publications are provided to GPO and the FDLP. The proposed amendment (Subpart 8.801[d]) will further exacerbate this problem and result in less rather than more access by the American public.

While the proposal presumes that agencies would transmit electronic files to GPO in a standardized, usable format that could be efficiently made available to the American

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public, there are no specifications or a coordinated national program in place that captures, preserves, and maintains access to electronic government information and data. Consequently the American public, through its appropriated tax dollars supports efforts that they will never have access to.

The GPO was created by Congress in 1860 (12 STAT 118) as a means to centralize the government's printing to "produce promptitude, uniformity, accuracy and elegance in the execution of public printing for the work of Congress...and that of the various departments." (Morehead, 6th edition, pg. 16). What is ironic about these FAR proposals is the suggestion that printing in the private sector can be done more economically and with a greater speed than currently practiced by the GPO. It is noteworthy because the GPO was created as the system of low bidder created delays and a product "executed in such an negligent and incorrect manner, as must bring disgrace and ridicule on the literature, and the press of our Country." (**100 GPO Years, 1861-1961: A History of U.S. Public Printing**, pg. 35-36). The FAR proposals suggest that government printing return the "good old days" where graft, patronage, and the like governed the dissemination of government information.

I firmly believe that the FAR proposals are extremely problematic for two reasons: first, it violates statutory provisions in effect that mandate agency use of GPO as a means to procure their printing and, second, these proposals will exacerbate the long standing problem of fugitive documents. While the proposals may seem reasonable to reasonable people unfamiliar with the operations of GPO and the FDLP, they lack the necessary means to coordinate and centralize necessary public access to government information.

Today, GPO, the SuDocs, and those involved in the oversight and administration of the FDLP, working in conjunction and coordination with library personnel, provide a strong, centralized, coordinated and managed system providing no-fee, permanent public access to government information. If OMB insists on revising the FAR it would be most beneficial for OMB to invest their time, energy, and resources in the following manner:

- Ensure that agencies commit to sound dissemination and public access policies.
- Facilitate agency ability to participate in the FDLP in order to make their publications more broadly accessible to the American public.
- Enforce compliance that will ensure agency participation in the FDLP.

Respectfully submitted,

1434

Daniel C. Barkley
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Regional Federal Depository Library 0383
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Albuquerque, NM 87131-1466
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To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

12/13/2002 04:47 PM

1435

Attached are the comments of e-LYNXX Corporation with cover letter re: FAR Case.

e

Douglas P. Harbach
Vice President
e-LYNXX Corporation
888-876-5432
dph@e-lynxx.com

printLYNXX[®] is an easy-to-use print procurement solution
to automate workflow, streamline communication, save money



FAR Case 2002-011 e-LYNXX Letter FAR Case 2002-011 e-LYNXX Comment

1435

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Office of General Counsel
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Anthony W. (Andy) Hawks
Vice President and General Counsel

Direct Line: 703-360-4141
Legal Fax: 703-360-4445

December 13, 2002

**VIA ELECTRONIC SUBMISSION
AND HAND-DELIVERY**

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW, Room 4035
Washington, D.C. 20405
ATTN: Laurie Duarte

Re: Public Comments on FAR Case 2002-011

FAR Council:

The accompanying public comments are hereby submitted on behalf of e-LYNXX Corporation with respect to the Proposed Rule that was issued on November 13, 2002 (67 Fed. Reg. 68914) to implement OMB Memorandum No. M-02-07 on Procurement of Printing and Duplicating Through the Government Printing Office. If you have any questions or would like e-LYNXX to supplement these comments, please contact me at (703) 360-4141 or awh@e-lynxx.com.

Very truly yours,

s/Anthony W. Hawks

Anthony W. Hawks
Vice President and General Counsel

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**PUBLIC COMMENTS
OF e-LYNXX CORPORATION**

FAR CASE 2002-011

**PROPOSED RULE ISSUED NOVEMBER 13,
2002 – 67 FEDERAL REGISTER 68914**

**OMB MEMORANDUM NO. M-02-07
ON PROCUREMENT OF PRINTING
AND DUPLICATING THROUGH THE
GOVERNMENT PRINTING OFFICE**

For additional information, contact:

**Anthony W. Hawks
Vice President and General Counsel
e-LYNXX Corporation
8224 Kings Arm Drive
Alexandria, VA 22308
(703) 360-4141 and (Fax) 360-2557**

**Submitted On
December 13, 2002**

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EXECUTIVE SUMMARY

The Proposed Rule presents a welcome opportunity to modernize the Federal Government's print procurement system. We strongly support this modernization effort, and believe that the Proposed Rule, with certain revisions, could create in the executive branch the type of fair, open, and competitive system that is essential to the continued well-being of thousands of small business printers. The modernization can only be accomplished, however, by utilizing electronic commerce solutions that are achieving in the private sector what OMB has identified as its three primary goals: enhanced competition, greater cost-savings, and the promotion of small business opportunities.

In fostering this modernization, the Proposed Rule should be cognizant of two features of GPO's centralized procurement system that have been effective and should be maintained or incorporated into any new print procurement regime. These features are GPO's success in (1) minimizing agency printing costs and delivery times for small and micro-purchases; and (2) providing maximum job opportunities for small business printing concerns. At the same time, however, GPO has demonstrated (3) an inability to adopt the most cost-effective method of handling small and micro-purchases; (4) an inability to offer "best value" contract awards and systemic transparency for stakeholders who want to communicate directly and track workflow easily; and (5) an inability to counter a growing agency preference for in-house print production and sole-source direct purchasing from the private sector, which in turn has led to an increasing number of "fugitive documents".

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The Proposed Rule achieves progress in the areas of “best value”, in-house printing, and fugitive documents, but revisions are needed to attain all five goals listed above. Accordingly, we recommend delaying until September 30, 2003 implementation of those parts of the Proposed Rule that relate to GPO’s mandated procurement status in order to give the new Public Printer time to effectuate changes that address the concerns outlined in OMB Memorandum No. M-02-07. Thereafter, beginning with Fiscal Year 2004, we recommend keeping the new requirement that GPO compete for agency work being produced at GPO’s in-plant facilities, but modifying the Proposed Rule so that executive agencies can elect either (i) to continue using GPO as a print procurement agent, or (ii) begin procuring printing services directly from the private sector; *provided that* the agency head, with the concurrence of the Administrator of the Office of Federal Procurement Policy, has certified to the OMB Director that the agency has demonstrated the capability of procuring its printing using electronic commerce technology that is commercially available in the private sector and which:

- creates solicitations on all outsourced print jobs, including small and micro-purchases, and makes them available to the private sector for dissemination;
- awards printing contracts on a “best value” basis that incorporates and maximizes use of objective standards for rating vendor performance;
- furnishes system-wide transparency as to bid results, production workflow, and delivery status;
- ensures full compliance with the distribution requirements of the Federal Depository Library Program; and
- allows robust monitoring and oversight by OMB.

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A. Introduction

These public comments are being submitted on behalf of e-LYNXX Corporation, a information technology and print management consulting firm based in Chambersburg, Pennsylvania, with over 27 years experience in the Federal print market. During the past quarter century, we have been an essential link in the supply chain by which executive departments and agencies obtain printing services from the private sector through the U.S. Government Printing Office (GPO).

These comments relate to the proposed rule that was issued on November 13, 2002 (“Proposed Rule”) to implement OMB Memorandum No. M-02-07 on Procurement of Printing and Duplicating Through the Government Printing Office (“OMB Memo”). Our interest in the Proposed Rule derives from the value-added services that we furnish to hundreds of GPO contractors throughout the nation. In brief, our company pays GPO a full cost-recovery fee to obtain all bid solicitations that GPO issues to the private sector based on printing requisitions received from its agency customers. We then “add value” to these solicitations by coding, data-entering, sorting, and disseminating them to printer clients based on the specific solicitation types, product categories, and geographic areas that our clients select.

Since most printers are small businesses, and since GPO typically issues 150-200 bid solicitations (including small purchases) each business day, we provide a valuable service that enables many printers to participate in the GPO print market – printers who would otherwise lack the resources to find agency jobs that are tailored to their production capabilities. In addition to this core bid solicitation distribution service,

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we also offer training on how to succeed in the federal print market, furnish print job-related package pick-up services, and maintain a comprehensive database for clients seeking information on GPO bid results, job details, and print volume.¹

Given this background, we have long been a supporter of GPO's unique system of de facto "full and open competition" for all types of print jobs, including both small purchases and micro-purchases. We recognize, however, that for many years GPO has failed to maintain the goodwill of many of its customer agencies and that its business model has failed to generate sufficient revenue to cover its operating costs, and that neither shortcoming can be eliminated unless GPO modernizes the way in which it services its agency customers.

The Proposed Rule presents a welcome opportunity to achieve this modernization. We strongly support this modernization effort, and believe that the Proposed Rule, with certain revisions, could create in the executive branch the type of fair, open, and competitive system that is essential to the continued well-being of thousands of small business printers. As our public comments will make clear, however, this modernization can only be accomplished with electronic commerce solutions that are achieving in the private sector what OMB has identified as its three primary goals: enhanced competition, greater cost-savings, and the promotion of small business opportunities. 67 Fed. Reg. 68914.

For reasons more fully explained below, we recommend delaying until September 30, 2003 implementation of those parts of the Proposed Rule that relate to

¹ The figures referenced in these public comments are based on reports drawn from this database.

1435

GPO's mandated procurement status in order to give the new Public Printer time to effectuate changes that address the concerns outlined in the OMB Memo. Thereafter, beginning with Fiscal Year 2004, we recommend keeping the new requirement that GPO compete for agency work being produced at GPO's in-plant facilities, but modifying the Proposed Rule so that executive agencies can elect either (i) to continue using GPO as a print procurement agent, or (ii) begin procuring printing services directly from the private sector; *provided that* the agency head, with the concurrence of the Administrator of the Office of Federal Procurement Policy, has certified to the OMB Director that the agency has demonstrated the capability of procuring its printing using electronic commerce technology that is commercially available in the private sector and which:

- creates solicitations on all outsourced print jobs, including small and micro-purchases, and makes them available to the private sector for dissemination;
- awards printing contracts on a "best value" basis that incorporates and maximizes use of objective standards for rating vendor performance;
- furnishes system-wide transparency as to bid results, production workflow, and delivery status;
- ensures full compliance with the distribution requirements of the Federal Depository Library Program; and
- allows robust monitoring and oversight by OMB.

B. GPO's Current System of "Full and Open Competition"

Prior to 1982, GPO print procurement lacked "full and open competition" and, instead, allowed GPO contracting officers to award work to printers who were either

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conveniently located near the procurement office or large enough to maintain a sales staff that could win work through direct marketing. The GPO then opened up its procurement system in 1982 by establishing a "Bid Subscription Service", whereby GPO began selling timely copies of all printing solicitations (regardless of dollar value) to the public on a daily basis for a full cost-recovery fee. In so doing, the GPO began what has now become a 20-year old partnership with the private sector to disseminate federal printing solicitations nationwide to thousands of printers and thereby achieve "full and open competition" *without* additional cost to the taxpayer or the increased regulatory burdens that are associated with large dollar purchases under the FAR.

It is important to point out that the FAR does *not* differ significantly from the GPO's Printing Procurement Regulation (PPR) in this regard. Under the PPR, the simplified acquisition threshold is \$50,000 (rather than \$100,000) and the micro-purchase threshold is \$1,000 (rather than \$2,500). The difference lies in the GPO's reliance on the private sector to create a de facto system of "full and open competition" for *all* of its bid solicitations, including small and micro-purchases, thereby *achieving* the cost-savings of "full and open competition" without formally *requiring* "full and open competition" in any statute or formal GPO regulation.²

During the past 20 years, however, GPO has failed to modernize its procurement system, causing it to lose the goodwill of many agency customers who are mainly frustrated by two things: (1) lack of knowledge about the status of their print jobs; and

² Instead, this policy of relying on private sector bid solicitation distribution to achieve "full and open competition" is embodied in an internal GPO memorandum, known as GPO Instruction PP304.1.

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(2) GPO's refusal to award work based on "best value" rather than low price. Because GPO serves as the contracting entity, agencies are generally precluded from dealing directly with the printer who is producing their work. Yet GPO offers no system for tracking the progress of a print job, thus leaving agencies in the dark until a deadline is missed or a job is rejected. This frustration is heightened by the fact that agencies are often forced to send their work to a low bidder whose past performances have been less than stellar but not so poor as to result in a default or non-responsibility declaration.

It is these two factors that are driving agency customer dissatisfaction and which can be traced to GPO's status as a mandated source of print procurement under Title 44. Protected by their statutory mandate, GPO has consistently failed or refused to reform itself in a way that would satisfy longstanding customer concerns. As a result, executive agencies have gradually undermined the fair, open, and competitive nature of the existing GPO procurement system by producing more print jobs in-house and purchasing jobs directly from the private sector outside the GPO system. It is not surprising then that there has been a significant decline in annual GPO print volume over the last decade – from over \$550 million in Fiscal Year 1992 to roughly \$400 million today – without a corresponding drop in the federal budget for Object Class 24 (Printing and Duplicating).

At the same time, GPO's failure to modernize has caused it to operate on a financially unsustainable business model, as demonstrated in Booz•Allen & Hamilton's *Management Audit of the Government Printing Office*, released in May 1998 ("Booz•Allen Management Audit"). What Booz•Allen found is that small and micro-

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purchases are the reason why GPO is unable to finance its procurement operations without Congressional appropriations. At the time of the Booz•Allen Management Audit, procurements under \$25,000³ accounted for 98% of GPO's Printing Procurement Department (PPD) workload, but only 53% of its revenue.⁴ As a result, Booz•Allen necessarily concluded that the GPO's "large dollar segment of procurements is vital to the success of the PPD; without it, the PPD would be unable to maintain viability."⁵ To stem the losses being incurred from the small purchases themselves, Booz•Allen urged that GPO acquire an electronic commerce solution for print procurement, which it described as follows:

Essentially, the PPD has no *integrated* automated procurement capability.... GPO should be striving to achieve a "paperless" procurement process" among the customer, GPO, and the vendors.... An integrated, automated system should be implemented that allows electronic transmission of agency requirements to GPO and that electronically processes the requirements through various steps of procurement planning and preparation, solicitation, bid/proposal evaluation, source selection, and contract award. All of the procurement steps should be merged into one seamless computerized system. Paper jackets [i.e. solicitations] should be eliminated and replaced with electronic processing of printing procurement requirements between relevant organizations and individuals. Solicitation packages should be established online, and processed online. Solicitations to vendors should be transmitted via the Internet or other electronic interface (e.g. e-mail), and bids should be received, evaluated, and awarded in a paperless manner. Vendors who do not make the required investment in technology will be incapable of meeting the solicitation requirements and should be eliminated from competition.... Further, the automated procurement system should provide management information on timely status on all jobs, and workload and performance data for use by all levels of management. Performance measurements, including procurement processing

³ GPO defined its "small purchases" in 1998 as acquisitions not exceeding \$25,000. This small purchase threshold was subsequently raised to \$50,000 in May 2001.

⁴ Booz•Allen & Hamilton, *Management Audit of the Government Printing Office*, at p. 3-7 (May 21, 1998).

⁵ Id.

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time, quality of procurement, maximizing value at least cost, and customer satisfaction should be established and tracked on a regular basis to help determine the Printing Procurement Department's effectiveness and efficiency.

See Booz•Allen Management Audit at pp. 3-24 to 3-25 (emphasis in original). In his official response to this Management Audit, the Public Printer defended his agency's procurement operations and virtually ignored the Booz•Allen recommendation for an electronic commerce system. See Letter from Michael F. DiMario, Public Printer dated April 29, 1998 (attached to Management Audit Final Report). It is important to note, however, that GPO is not unique in this respect. Any executive agency buying print for itself or another agency would sustain a similar losses on small and micro-purchases if this work was outsourced by competitive means without the web-based "integrated automatic procurement capability" recommended by Booz•Allen.

The end result is that GPO's centralized procurement system has two features which are successful and should be maintained or incorporated into any new print procurement regime, and three features that have undermined the current system and must be corrected under the Proposed Rule. The two features that should be maintained are GPO's success in (1) minimizing agency printing costs and delivery times for small purchases; and (2) providing maximum job opportunities for small business printing concerns. The three features that must be corrected are the current system's (3) inability to handle small purchases on a cost-effective basis; (4) failure to offer "best value" and systemic transparency for stakeholders who want to communicate directly and track workflow easily; and (5) growing agency preference for in-house print production and sole-source direct purchasing from the private sector, which in turn

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leads to an increasing number of “fugitive documents”. For the reasons stated below, the Proposed Rule achieves progress in the areas of “best value”, in-house printing, and fugitive documents, but revisions are needed to attain all five of the objectives listed above.

C. GPO’s Dual Role As Provider of Print Production and Procurement Services

As OMB Director Mitchell E. Daniels, Jr. noted in his policy statement on May 3, 2002, there is a longstanding bipartisan Executive Branch view that GPO’s mandatory status under Title 44 is unconstitutional, as a violation of both (1) the separation of powers doctrine (because GPO cannot exercise executive functions as a legislative agency – the so-called “*Bowsher*” problem)⁶ and (2) the Constitution’s presentment clause (because Title 44 empowers the Joint Committee on Printing to grant legislative waivers without presenting a bill to the President that has been passed by both the House and Senate – the so-called “*Chadha*” problem)⁷. Congress has been aware of these constitutional issues since at least May 1996, when the Department of Justice (DOJ) released a formal opinion on the matter, but nonetheless has failed to take any action that would resolve this problem.

Shortly after the DOJ opinion was released, the Clinton Administration reassured Congress by adopting policy of voluntary compliance with Title 44 – the idea being that while it was unconstitutional to force executive agencies to send their printing to GPO, there was nothing improper about the Administration electing to do so. This policy of

⁶ *Bowsher v. Synar*, 478 U.S. 714 (1986).

⁷ *INS v. Chadha*, 462 U.S. 919 (1983).

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voluntary compliance was never intended to be long-term, however, and while Congress could have attempted to resolve the constitutional issues by amending Title 44 or obtaining a favorable court ruling, it was inevitable at some point that OMB would stop recognizing GPO's mandatory status.

As a print management consulting firm, e-LYNXX takes no position and offers no comments on the merits of this constitutional dispute. The focus of these comments is strictly on how best to create the most efficient and cost-effect print procurement system for the Federal Government. In addressing this constitutional issue, however, it is important that the Proposed Rule distinguish between GPO's role as a provider of print production services at its in-plant facilities and its role as print procurement agent or broker that already outsources over 75% of agency requisitions to the private sector.

1. Requiring GPO To Compete For In-Plant Production Work

The Propose Rule is explicit in mandating that "agencies shall not obtain printing services from GPO after January 1, 2004 unless GPO demonstrates [best value] through public-private competition" 67 Fed. Reg. at 68918. Insofar as GPO is providing the printing service itself, it is acting in the same role as any private sector printer and should be required to compete in the same manner as commercial printers. We support this provision in the Proposed Rule, but for purposes of clarification, and for reasons more fully stated in the next section, we also recommend changing the phrase "printing services" to "print *production* services."

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2. Making GPO's Print Procurement Services Optional

While supporting the new competition requirement for GPO's in-plant production services, we respectfully submit that the text of the Proposed Rule is overbroad in its impact on GPO's role as a print procurement agent for the agencies. As we understand the text of proposed FAR 8.801(c), beginning January 1, 2004, GPO would no longer be recognized as an *optional* source of print procurement services. This is apparent from the pre-2004 transition period during which "agencies may opt to use the services of GPO without requiring competition to select GPO" (67 Fed. Reg. at 68916) – the clear implication being that after January 1, 2004 agencies may *not* use GPO as an optional print procurement source unless GPO successfully competes against the "best value" offered by direct contracts with the private sector or in-house agency printing facilities.

The key phrase here is "printing services", as used in proposed FAR 8.801(c). If meant to refer only to GPO as a *producer* of printing services, then it is both logical and reasonable to make GPO's in-plant shops compete for agency print jobs (assuming the unconstitutionality of its mandatory status under Title 44). GPO, however, is predominantly a *procurer* of printing services, outsourcing over 75% of its customer agency printing requisitions. Given this fact, if "printing services" is meant to encompass GPO's print procurement services, then the Proposed Rule would be setting up an unworkable double system of bidding competition in which solicitation responses for the same print job would be requested both by GPO and the agency buyer itself. This procurement morass would raise all sorts of questions like:

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- Would the agency solicit bids simultaneously with GPO or wait for GPO to obtain bid prices and then go out on its own?
- Would printers be allowed to submit separate bids to GPO and the agency? If so, could the bids be different and, again if so, which one would count?
- Would GPO report all the bid results or just the low bid to the agency for a “best value” comparison with the agencies direct bids?
- Would GPO be expected to make a “best value” judgment as to the bids it received or just forward the bid information onto the agency for a “best value” comparison?
- Would GPO be allowed to cull out non-responsive bids? If so, would the non-responsive printer be allowed to try again directly with the agency?
- Would GPO be allowed to declare a printer non-responsible before sending its bid to the agency? If so, would the non-responsible GPO bidder be allowed to appeal to the agency for consideration of its bid?
- If GPO outsourced the agency's print job under the new “best value” standard, which set of procurement rules apply, the FAR or GPO's Printing Procurement Regulation, Contract Terms, and QATAP standards?

Such a system of double bidding is untenable not only from the agency's standpoint, but also for printers who would now have to cope with different regulatory schemes for the same job.

The solution, however, should *not* be for OMB to restrict the freedom of choice and flexibility of agencies by forcing them to drop GPO as a purchasing agent and outsource print jobs exclusively under the FAR. While the constitutional objection over GPO's mandatory status remains unresolved, no case has been made for *prohibiting* agencies from using GPO under current procedures. It is one thing for agencies to complain about being forced to use GPO, but quite another to determine by FAR rule

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that agencies cannot decide for themselves whether GPO's procurement services offer them "best value." Director Daniels was very clear in the OMB Memo that "[i]t is the policy of this Administration to ensure that the federal government receives the best possible deal when spending taxpayers' money." Prohibiting agencies from seeking the "best possible deal" using GPO's print procurement services undermines this policy.

D. Making Small Purchases More Costly and Less Available

The Proposed Rule effectively denies the private sector the opportunity to compete for what now constitutes roughly 80% of GPO's procurement work – namely small purchases that are \$2,500 or less. Under FAR § 13.202(a)(2), these "micro-purchases may be awarded without soliciting competitive quotations if the [purchasing official] considers the price to be reasonable." Thus, if governed by the FAR, 80% of all future government printing contracts that now go to small businesses throughout the country could be awarded on what, in effect, would be a sole-source basis.

We understand that the FAR Council originally considered limiting "full and open competition" to printing jobs over \$25,000, which under FAR § 5.101(1) is the threshold dollar amount for advertising solicitations at "FedBizOpps" (www.fedbizopps.gov), the single Government Point of Entry (GPE). To address concerns that such a high threshold would limit the range of bidding opportunities for small printers, the Proposed Rule now sets the GPE threshold (for printing only) to the FAR micro-purchase threshold amount of \$2,500. This lower threshold is advantageous for small business printing concerns, but it ignores the fact that most government print jobs are under \$2,500, so that any benefit from this uniquely low GPE threshold for printing will likely

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be much less than the FAR Council anticipates.

As pointed out above in Section B, GPO obtains de facto “full and open competition” on *all* jobs, regardless of dollar value, not by posting (electronic or otherwise), but by making their solicitations available for purchase in bulk by any interested party, which can then distribute the solicitation according to market demand. Thus, the real effect of limiting GPE notification to jobs over \$2,500 will be to *severely restrict competition and bidding opportunities for small businesses* below this threshold since no agency has a bulk sale program in place. The resulting lack of competition will greatly increase the costs of small purchases to the agencies.

How severe will this restriction and added costs be? Assuming that the nature of print jobs does not change when it is procured directly by an agency rather than through GPO, the impact is likely to be considerable. For the fiscal year that just ended on September 30, 2002, for example, GPO issued 39,202 small purchase and formal jackets, valued at \$203.6 Million (or roughly half of all printing work outsourced through GPO). These jobs are broken down by dollar range as follows:

| <u>Dollar Range</u> | <u>Small Purchases</u> | <u>Formal Jackets</u> |
|----------------------|------------------------|-----------------------|
| \$1 - \$500 | 16,546 jobs (43.7%) | 14 jobs (01.0%) |
| \$501 - \$2,500 | 13,580 jobs (35.9%) | 138 jobs (10.1%) |
| \$2,501 - \$25,000 | 7,332 jobs (19.4%) | 443 jobs (32.4%) |
| \$25,001 - \$100,000 | 364 jobs (01.0%) | 522 jobs (38.1%) |
| Over \$100,000 | 11 jobs (00.0%) | 252 jobs (18.4%) |
| TOTALS: | 37,833 jobs (100%) | 1,369 jobs (100%) |

Comparable figures for print orders issued under GPO term contracts, including both single-award and multiple-award programs, show a similar finding:

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| <u>Dollar Range</u> | <u>S-Programs</u> | <u>M-Programs</u> |
|----------------------|---------------------|---------------------|
| \$1 - \$500 | 53,011 PO's (63.6%) | 14,078 PO's (59.9%) |
| \$501 - \$2,500 | 20,801 PO's (25.0%) | 6,332 PO's (26.9%) |
| \$2,501 - \$25,000 | 8,674 PO's (10.4%) | 2,893 PO's (12.3%) |
| \$25,001 - \$100,000 | 670 PO's (00.8%) | 179 PO's (00.8%) |
| Over \$100,000 | 193 PO's (00.2%) | 22 PO's (00.1%) |
| TOTALS: | 83,349 PO's (100%) | 23,504 PO's (100%) |

Thus, if the proposed amendment takes effects in its current form, one can expect that as much as 80% of executive agency one-time jobs and 90% of print orders will be procured by Government-wide commercial purchase cards with minimal or no bidding competition.

Who will benefit from this new system? For jobs \$2,500 or less, the largest printers are likely to profit most because they can devote more resources to the type of sales and marketing efforts that will be needed to obtain this non-competitive work. This result, of course, would directly conflict with the FAR Council's express aim of creating "a much broader range of opportunities for small businesses." 67 Fed. Reg. 68914.

The Proposed Rule, however, also hurts large printers. Specifically, large printers with over 500 employees would lose out on jobs valued between \$2,501 and \$100,000 (inclusive), which would become subject to small business set-asides under the FAR. Whereas, the GPO recently ended its set-asides for small disadvantaged businesses and now limits its socio-economic program to Javits-Wagner-O'Day Act requirements for the blind and severely disabled, the FAR imposes much stricter set-aside requirements. Specifically, under FAR § 19.502-2(a), any print job with

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an anticipated dollar value exceeding \$2,500, but not over \$100,000 is automatically reserved exclusively for small business concerns and shall be set aside for small business unless the contracting officer determines there is not a reasonable expectation of obtaining offers from two or more responsible small business concerns that are competitive in terms of market prices, quality, and delivery.

Since it is highly unlikely, given the Proposed Rule's publication requirements for print jobs over \$2,500, that an agency would fail to get competitive bids from two or more printers with 500 or less employees, printing companies with over 500 employees would be "automatically" excluded from bidding on work valued between \$2,500 and \$100,000. In that event, the impact of this set-aside requirement could be very adverse to the interests not just of large printers, but also the agencies themselves. Large printers, like other GPO vendors, rely on GPO work to fill short-term production downtime – a key element in those printers' ability to maintain profitability. Deprived of small purchase and term contract work between \$2,501-\$100,000, these larger printers will go after the \$0-\$2,500 work even more intensely to the exclusion of small and mid-size printers. Conversely, small and mid-size printers will be cut out of the small jobs for which they are best suited and left competing for the larger \$2,501-\$100,000 work.

From a quality assurance and delivery standpoint, it is precisely the \$2,501-\$100,000 work – which tends to be larger and more complex – that agencies will want larger printers (who generally have higher quality level ratings, larger production capacity, more sophisticated equipment, and skilled personnel) to be able to produce. Instead, the Proposed Rule will create a system where the largest printers produce the smallest jobs, and small to mid-size printers produce most large jobs – just the opposite of what agencies would want and expect.

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E. Slower Small Purchase Turn-Around Times

In addition to minimizing printing costs by partnering with the private sector to create a de facto system of “full and open competition” for all print jobs, the GPO procurement program offers another unique and highly advantageous feature: the speed with which both small purchases and formal jackets can be bid out and performed. Unlike executive branch agencies, GPO utilizes an official minimum bidding time of just 4 hours, and even then GPO has been known to require bids in as little as 1-2 hours.⁸ While GPO maintains a 15-day notice rule for jobs that are publicized in Commerce Business Daily, this rule only applies to jobs not published electronically on the GPO print procurement web page, of which there are now few if any. Indeed, of the 39,202 solicitations identified above for Fiscal Year 2002, 22,790 (58.1%) were small purchase jobs that opened either the same day on which they were issued or the following day and needed to be produced within an average of 10 days. Another 15,043 (38.4%) were small purchase jobs that opened on average within two days of issuance and were typically produced within thirteen days. The remaining 1369 (3.5%) solicitations were formal one-time jobs on which printers typically had four days to bid and 27 days to produce.

As a legislative agency governed by its own Printing Procurement Regulation, GPO has the flexibility to meet these fast turn-around times. Such flexibility for jobs valued over \$2,500 would be lost under the FAR. For jobs \$2,500 or less, flexibility would not be an issue because the Proposed Rule would permit such jobs to be

⁸ GPO adopted this 4-hour turn-around standard in 1994. Prior to that time, the official GPO minimum turn-around time was three working days.

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procured by purchase card without notice or competition. At the same time, however, fast turn-around times for these smallest of jobs will pressure purchasing officials not only to use their purchase cards, but also to buy regularly from the same (and probably large) printer each time, further undermining OMB's goals of cost-savings and expanding small business opportunities.

For jobs over \$2,500, however, the situation is quite different because, under the new GPE threshold for printing, these jobs will be governed by the same rules that currently apply to procurements between \$25,000 and \$100,000. These rules are set out in FAR §§ 5-201(a), (b)(1)(i), and 5-203(a), which generally require that a notice of solicitation be published on FedBizOpps at least 15 days before the solicitation itself is issued. Thereafter, upon issuance, agencies are further required to give vendors a minimum 30-day response period for submitting bids or proposals. To be sure, there are exceptions to this 15-day notice/30-day response rule, but the exceptions that would be applicable to printing are hardly reassuring if the FAR Council is expecting short-turnaround times on a regular basis. Under FAR § 5-202(a)(2), for example, shorter notice and response times can be used, but only when the proposed contract action is deemed "unusual and compelling urgency." Similarly, under FAR § 5-202(a)(6) and Subpart 16.5, indefinite-delivery contracts (including definite-quantity, requirements, and indefinite-quantity contracts) are exempted, but again this exemption would tend to favor the larger printers who can better compete for and perform such contracts.

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The most relevant exemption, set forth under FAR §§ 5-202(a)(10) and 5-203(a) & (b), applies to “commercial items”,⁹ for which contracting officers may establish a “shorter” notice period than 15 days and designate a “solicitation response time that will afford potential offerors a reasonable opportunity to respond” after considering such circumstances as “complexity, commerciality, availability, and urgency.” In theory, this exemption would authorize agency contracting officers to solicit bids in less than 24 hours, but the Proposed Rule still leaves unanswered whether any minimum response period similar to the GPO 4-hour rule would apply. Even if the Proposed Rule explicitly

⁹ While it is probably true that printing services can be equated to a “commercial item” under the definitional section in FAR § 2-101(f), see *Matter of Aalco Forwarding, Inc.*, B-277241.8; B-277241.9, 97-1 CPD ¶ 110 (October 21, 1997) (household goods moving services qualify as “commercial item”), the FAR Council may wish to examine this issue more closely. To qualify as a “commercial item” under the FAR, the printing service must be

of a type offered and sold competitively in substantial quantities in the commercial marketplace based on established catalog or market prices for specific tasks performed under standard commercial terms and conditions. This does not include services that are sold based on hourly rates without an established catalog or market price for a specific service performed.

FAR § 2-101(f). The acquisition of “commercial items”, however, is governed by FAR Part 12, which expressly requires “market research to determine whether commercial items ... are available that could meet the agency’s [printing] requirement.” FAR § 12-101(a). Unless this “market research” requirement is dispensed with as nothing more than a formality each time printing services are requisitioned, it would become a significant administrative and time burden for contracting officers trying to procure numerous low-dollar print jobs. Moreover, customized printing, particularly short turn-around work, is exactly the type of service that is *not* offered and sold competitively based on “*established* catalog or market prices.” FAR § 2-101(f) (emphasis added). The inherent nature of customized printing is that it cannot be accurately priced until the printer has reviewed the manufacturing specifications, requisite quality level, shipping instructions, and delivery date(s) – *and then matched that information with available press equipment and production time*. This is why it would be difficult to develop a GSA multiple award schedule for printing services and why the printing of OMB’s Fiscal Year 2004 budget documents cannot be ordered out of a catalog. Absent clarification that printing will be routinely treated as “commercial items”, the Proposed Rule would play havoc with agency print jobs that are above the \$2,500 threshold but must be produced under tight time deadlines.

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authorized and/or established a 4-hour turn-around time for printing, there are no procedures in place at the agencies to actually implement such a rule.

What is significant about the GPO's Bid Subscription Service ("BSS") is not that solicitations are made available to interested parties – this can be accomplished by mere posting (electronic or otherwise) – but rather that solicitations are made available in a *comprehensive and timely* fashion. Thus, when GPO requires bids back in a matter of hours, the solicitation is proactively sent to all BSS subscribers at the same time and in the same manner as recipients on GPO's rotation list for that solicitation. Because there is no requirement under the Proposed Rule either (i) to make small purchases under the \$2,500 GPE threshold available to anyone (other than the sole source recipient of the job) or (ii) to furnish solicitations over \$2,500 to private sector retailers in a comprehensive and timely manner, there is virtually no likelihood that the Proposed Rule will foster a system that produces the quick turnaround times so common at GPO.

F. Impact On Agency In-Plant Facilities

The most encouraging aspect of the Proposed Rule is its cost accounting requirements, which are designed to limit in-house printing operations. The proposed regulation would allow agencies to send work to in-plant facilities, "but only where such executive branch operations demonstrate, based upon a full account of all costs" that, in competition with GPO and the private sector, the in-plant facility offers the "best combination of quality, cost, and delivery" (i.e. "best value") or lowest price where the award is based solely on cost or price-related factors. 67 Fed. Reg. 68917.

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In theory, this aspect of the Proposed Rule should create a systemic bias in favor of outsourcing work to the private sector, either directly or through GPO, particularly since there is no exemption from the new cost accounting rule based on dollar value, even for jobs under \$2,500.¹⁰ Agency print officials will still have the option of going to an in-house facility, but when they do so, a cost accounting will have to be done showing that the in-plant facility can provide “best value” or, where applicable, the lowest price in competition with the private sector or GPO’s own in-plant operation. Given the tens of thousands of federal printing contracts awarded each year, as well as the extremely short time-frames in which most print jobs must be awarded and produced, it is unlikely that agency purchasing officials will want to take the time or make the effort to prepare the requisite cost-accounting findings and evaluate the result against the “best value” offered by GPO or the private sector – unless of course the FAR’s notice and response requirements give them no choice but to go in-house.

A number of issues, however, still need clarification. Since the Proposed Rule specifically calls for a “public-private competition” in draft FAR § 8.801(a)(3), the clear implication is that losers in this competition will be allowed to protest the outcome if they believe that there are legal grounds for doing so. In that event, the cost accounting findings made by the agency must be made available to GPO and private sector competitors as a matter of course; otherwise neither GPO nor the printers can know whether there are legitimate grounds for challenging the in-house cost-accounting

¹⁰ Such a systemic bias may be particularly important for print jobs in the \$2,500-\$100,000 range, which contracting officers will be more inclined to send to in-house facilities to avoid the cumbersome notice and response requirements discussed in the preceding section.

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analysis. The draft regulation should make this disclosure requirement explicit. Similarly, the phrase “full account of all costs” is so broad as to be nebulous. Will agencies just be computing the marginal costs of each print job or will overhead costs be included, and if so, how will they be computed? Guidance is needed on such issues to ensure that agencies make their cost-accounting findings on a legitimate basis using consistent methodologies.

G. Utilizing Objective Standards for Best Value Awards

One of the most important changes in the Proposed Rule is the automatic application of “best value” criteria for the award of printing contracts that do not exceed the simplified acquisition threshold (\$100,000). This policy change is in direct contrast with the GPO approach of making awards to the low responsive and responsible bidder (assuming the price is fair and reasonable) in all cases other than work awarded under GPO’s simplified purchase agreements (SPAs). The GPO policy is set out in its Printing Procurement Regulation (PPR) at Ch. VII, § 4.2(c) for small purchases and PPR Ch. XII, § 1.1 for formal jackets and term contracts. The rules governing SPAs are found at PPR Ch. VII, § 9.6(d), which require agency buyers to place SPA orders “on the basis of best value” as determined by “price and other factors” including “responsiveness, business practices, convenience, courtesy, attention to detail and elements of past performance including work quality, reliability, and schedule compliance.”

The Proposed Rule would now allow agency buyers to award print jobs up to \$100,000 using the same criteria as GPO’s SPA program. Specifically, FAR § 13.106-2(b) gives contracting officers “broad discretion” to establish the most suitable

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evaluation procedures, which may use “price and other factors” such as past performance as award criteria. Formal evaluations are not required, and the contracting officer may rely on personal knowledge and prior experience to select the winning vendor, although under FAR § 13.106-3(b)(3)(ii) the officer must prepare a written statement supporting the award decision if non-price factors are considered. In contrast, for printing contracts valued above \$100,000, the award will be made using either the sealed bid procedures under FAR Part 14 or the negotiated acquisition procedures under FAR Part 15. If sealed bids are used, the award must be based on “price and the price-related factors included in the invitation.” FAR §§ 14.101(e) and 14.408-1(a). If a negotiated contract is awarded, the “agency can obtain best value ... by using any one or a combination of source selection approaches” – also referred to the “best value continuum”. FAR § 15.101. Consequently, this new “best value” policy will have its greatest impact on print jobs not exceeding \$100,000.

Complaints about the GPO “lowest bid wins” system derive from its rigidity. Agencies are justifiably frustrated when vendors with poor performance records (but not so poor as to be declared non-responsible) win out over competitors with excellent performance records just because they have submitted a bid that might be \$10 or even 10¢ lower. Their frustration is heightened by the fact that agencies have little or no control over the vendor base that is bidding on their work, and the vendors themselves have little incentive to provide excellent service when any service short of default will be enough to ensure that they can bid for the same job next year. The transition to a “best value” standard should address each of these complaints.

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In this regard, the Proposed Rule represents a unique opportunity to demonstrate how “best value” can be utilized with greatest effect. Given the fact that printing is a form of customized manufacturing in which tens of thousands of jobs are typically procured in small dollar amounts under tight time deadlines, agency buyers will have great difficulty in evaluating the quality and past performance records of each bidder each time a printing contract is outsourced. Indeed, it is common for GPO to receive dozens of bids on small purchase jobs, even though it has purposefully refrained from posting such jobs on the Internet, fearful of the added administrative burden and loss of quality control that such a step would entail. Imagine the result once small purchase jobs over \$2,500 are posted on the GPE for tens of thousands of printers to see and bid on. Agencies will need some way of pre-qualifying potential bidders for quality level and past performance, but the FAR provides no tools or procedures for accomplishing such tasks, and few purchasing officials will have personal knowledge of the dozens of printers that will now be submitting bids.

Even if agencies maintained up-to-date databases on the quality ratings, performance histories, and customer service records of potential print vendors, purchasing officials would have no time to make “best value” comparisons on dozens of incoming bids, particularly given the large number and quick turn-around speeds of small purchase print jobs.

The GPO system is rigid, but also maintains a high degree of openness in which printers know the criteria on which awards are based and full bid results are released to the public. Moreover, GPO is unique in the knowledge and performance records that it

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maintains on active GPO contractors. This knowledge could be used to make the type of “best value” judgments that would assure agencies that its work is only being awarded to high quality vendors. What is needed to eliminate the rigidity in the current GPO system is an objective methodology for factoring past performance and customer service into the price comparison that is made in determining the lowest responsive bid. GPO has previously developed comparable methodologies in promulgating its QATAP standards, and OMB should be pressing GPO to do the same for “best value”. An electronic commerce system with the features and capabilities recommended in the Booz•Allen Management Audit is the only viable solution to these problems.

H. Capturing Fugitive Documents By Electronic Means

Under the Proposed Rule, agencies for the first time must comply with a FAR mandate to “ensure” that copies of all Government publications are provided to the GPO Superintendent of Documents (“SuDocs”) for distribution to the Federal Depositories Libraries (“FDL”). 67 Fed. Reg. 68918 (proposed FAR § 8.801(d)). While this new mandate, together with the tightened restrictions on in-house print production, are important steps towards lessening the “fugitive document” problem, the Proposed Rule does not spell out how agencies are to implement this mandate. It only states that, once the publication is produced for the agency, a copy must be transmitted to GPO “using electronic means unless such means are unavailable”, *id.*, at which time GPO presumably would produce its own set of printed FDL distribution copies either at its in-plant shop or by outsourcing to the private sector.

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Of course, at that point the Government would receive none of the cost efficiencies that would accrue from including the FDL copies as “riders” in the agency’s original production order. It is true that the Proposed Rule further requires the agency to “consult” with GPO about the number of FDL copies that GPO wishes to obtain and “take reasonable and appropriate steps to assist GPO” in purchasing FDL copies under the agency’s awarded printing contract, but this requirement only applies if such consultation is “feasible” under the circumstances. 67 Fed. Reg. 68918 (proposed FAR § 8.801(e)). Missing from the Proposed Rule is any sort of established procedure whereby the SuDocs office is assured of having the opportunity to *participate* in the agency’s outsourced printing contract or in-house production.

The answer to this problem is not simply to have the publication sent to GPO in electronic format, but rather to use an available web-based interface that assures all stakeholders in the publication – agency purchasing officials, SuDocs personnel, and the private sector contractor – of automatic notification and participation in the procurement process itself. To accomplish this goal, the Proposed Rule should encourage government print buyers to acquire electronic commerce solutions that are presently available in the private sector.

I. Why Private Sector E-Commerce Solutions Are Needed

OMB has identified as its three primary goals the need “to induce competition, save taxpayer money, and promote small business opportunities.” 67 Fed. Reg. 68914. As demonstrated above, these goals in turn require that any new federal print procurement system incorporate all of the following elements: (1) the ability to handle

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small purchases in a cost-effective and timely manner that maximizes job opportunities for small business printers; (2) the ability to offer “best value” and workflow transparency to agency print buyers; and (3) the ability to discourage agency reliance on in-house print production and direct purchasing in a way that diminishes the number of “fugitive documents”. The Proposed Rule can foster the creation of such a print procurement system, but only if it encourages the use of private sector electronic commerce solutions.

1. The Small Purchase Problem

Under the current system, the administrative costs, time, and effort involved in obtaining “full and open competition” for small purchases typically outweigh any dollar savings achieved from the competition itself, particularly if the small purchase is commercially available and/or required on a fast turnaround basis. This “small purchase problem” is greatly exacerbated for printing not only because virtually all printing jobs are under the FAR’s \$100,000 simplified acquisition threshold (with 85% under the FAR’s micro-purchase threshold), but also because printing is a customized manufacturing process that requires special procurement expertise and which necessarily adds to the costs of contract administration. How then do you simultaneously (i) make these jobs available to small business printers on a quick turnaround basis (ii) using competitive bidding to keep acquisition costs down – without (iii) losing this competitive savings to higher administrative costs?

GPO has historically been able to accomplish only the first two of these tasks, using its Bid Subscription Service to partner with the private sector in disseminating

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small purchase solicitations on a full cost-recovery basis to hundreds of interested small business concerns. The savings to the taxpayer has been consistent and substantial over the past two decades, and agencies have long recognized GPO's ability to get the lowest market prices for print jobs over \$500.¹¹ While this competitive savings is passed onto the customer agency, however, the Booz•Allen Management Audit clearly showed that GPO cannot manage this process without incurring an administrative loss that must then be subsidized by the taxpayer.

With a properly deployed Internet-based electronic procurement system, this tension between competitive cost-savings and offsetting administrative costs dissipates. An e-commerce solution could manage the GPO's entire vendor base of 12,000+ printers, create and archive job specifications, disseminate solicitations, receive bids, issue purchase orders, track production milestones, and handle accounting and invoicing tasks for a fraction of the cost associated with GPO's current manual system.

Such a system can be set up using automatic bid rotation lists matching particular jobs with pre-qualified printers, while making solicitations available to interested parties for redistribution by the private sector in much the same manner as GPO does now with its Bid Subscription Service. Since electronic distribution would assure the receipt of numerous bids within hours or even minutes of the solicitation being issued, a de facto system of "full and open competition" would be maintained within the short turnaround parameters that typically apply to small purchases.

¹¹ A GAO study in 1995, for example, concluded that GPO's prices for jobs over \$500 were 21% less than comparable prices obtained by the Defense Printing Service (now Defense Automated Production Service). See *Government Printing: Comparison of DOD and GPO Prices for Printing and Duplicating Work*, GAO/NSIAD 95-65 at 5 (February 1995).

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Similarly, with instantaneous and transparent Internet workflow communications, such a system would greatly reduce the administrative costs associated with managing the small purchase after award.

2. The Best Value Problem

Even if high administrative costs were not an issue for small purchases, a policy of “full and open competition” creates the unintended consequence of allowing unqualified or poor performing vendors to bid on agency work (both small purchases and formal jobs). Customer agencies are clearly dissatisfied with GPO’s rigid “low bid wins” policy because it is not accompanied by an effective means of weeding out vendors who have done low quality work and/or missed delivery dates for agencies in the past. The solution, in theory, is a policy of awarding work based on “best value”, so that past performance can be taken into account in making a final decision. However, in practice “best value” can mean “personal preference”, especially for the 85% of jobs under the FAR \$2,500 micro-purchase threshold, which in turn will greatly undermine the cost-saving benefits of “full and open competition”. This problem is understandable when one considers the time involved in doing a “best value” analysis of 3-5 low range bidders on a \$500 print job!

With proper e-commerce technology, each bidder’s production quality, timeliness of delivery, and ability to meet production milestones could be weighted using the bidder’s past performance in these areas. The initial bid submissions would then be ranked according to the weighted figures produced by the “best value” comparison to generate a final low bidder, who would be identified as the suggested winner. The final

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award decision would still be left to the contracting officer, but the time-consuming and costly analysis of “best value” comparisons would be automatically and electronically performed. Executive agencies and GPO could acquire the necessary electronic commerce technology and build their own printer databases for use in making “best value” judgments according to their own objective rating standards. It is for this reason that we are suggesting the Proposed Rule allow an agency to buy its printing directly if it acquires a properly certified electronic commerce system. Such a certification process could be modeled on the earlier FACNET certification process, whereby agencies with certified full FACNET capability would be entitled to use the \$100,000 (rather than \$50,000) simplified acquisition threshold. See former FAR §4.505 (archived as FAC 90-29; July 3, 1995); and former FAR § 13.103(b) (archived as FAC 90-45; January 2, 1997). In this instance, however, the Office of Federal Procurement Policy would be certifying agency use of a private sector electronic commerce system that meets the goals and objectives of the OMB Memo.

3. The Fugitive Document Problem

We strongly support the FAR Council’s efforts to diminish the “fugitive document” problem and ensure agency compliance with the Federal Depository Library Program requirements set forth in 44 U.S.C. § 1901 et seq. However, to supplement the proposed transmitting of the final publication electronically to GPO for reproduction purposes, as the Proposed Rule currently mandates (unless “such [electronic] means are unavailable”), 67 Fed. Reg. 68918, an electronic commerce solution is needed to tie SuDocs personnel into the procurement process itself so that GPO can participate in

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whatever cost-savings are available from FDL publication “riders” on the agency's original print acquisition. Electronic commerce solutions that would accomplish this task are readily available in the private sector. It should further be noted that the Proposed Rule helps to minimize the “fugitive document” problem through its new cost-accounting rule to discourage in-house publications. An electronic commerce solution will also make outsourcing to the private sector (and notification to SuDocs) more convenient and cost-effective than in-house production. Thus, to the extent that agency officials prefer the convenience of an e-commerce solution, even fewer publications will escape the Federal Depository Library Program.

4. OMB Reporting and Oversight

As a final note, it should be mentioned that the Proposed Rule does not include any OMB reporting provisions as requested by Director Daniels in the OMB Memo. Specifically, Director Daniels indicated that:

Departments and agencies are to provide an annual report to the Director of the Office of Management and Budget on the overall cost of their printing and duplicating operations. Reports are to include a full accounting of all costs of work performed by GPO, work performed in-house, and work contracted directed to the private sector.

OMB Memorandum M-02-07 at 3 (May 3, 2002).¹² The most efficient, comprehensive, and cost-effective way for agencies to provide OMB not only with annual reports, but with full reporting capability and transparency into what agencies are spending on printing and how they are accounting for these monies, is to encourage agencies to utilize electronic commerce technology that is currently available in the private sector.

¹² Rather than propose specific language as to this missing provision in Attachment 1, we simply reserve a provision in the Proposed Rule for the FAR Council to address on its own.

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Such technology can link OMB personnel to the information and database compiled by such a system. For this reason and the other reasons stated above, the Proposed Rule should require the certification procedure proposed in these comments for agencies wishing to acquire full electronic print procurement capability.

J. Suggested Revisions to the Proposed Rule

In light of the foregoing, we suggest that the Proposed Rule be revised to (1) implement the cost-accounting restrictions on in-house agency print operations as soon as possible, with only a minor change to ensure disclosure of the agency's cost accounting finding; (2) maintain the current policy of voluntary compliance at least through September 30, 2003; and (3) beginning with Fiscal Year 2004, institute a certification process whereby agencies can acquired private sector web-based electronic commerce solutions that demonstrate all of the following capabilities:

- the ability to create solicitations on all outsourced print jobs, including small and micro-purchases, and make them available to the private sector for dissemination;
- the ability to award printing contracts on a "best value" basis that maximizes the use of objective standards for rating vendor performance;
- the ability to furnish system-wide transparency as to bid results, production workflow, and delivery status;
- the ability to ensure full compliance with the distribution requirements of the Federal Depository Library Program; and
- the ability to allow robust monitoring and oversight by OMB.

Accordingly, we respectfully proposed the attached revisions to the Proposed Rule.

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ATTACHMENT 1: PROPOSED REVISIONS

1. The authority citation for 48 CFR parts 6, 8, and 52 continues to read as follows:

AUTHORITY: 40 U.S.C. 486(c); 10 U.S.C. chapter 137; and 42 U.S.C. 2473(c).

PART 6—COMPETITION REQUIREMENTS

6.302-5 [Amended]

2. Amend section 6.302-5 in paragraph (b) by removing paragraph (b)(3) and redesignating paragraphs (b)(4), (b)(5), and (b)(6) as paragraphs (b)(3), (b)(4), and (b)(5), respectively, effective October 1, 2003.

PART 8—REQUIRED SOURCES OF SUPPLIES AND SERVICES

8.0038.002 [Amended]

3. Amend section 8.0038.002 by removing paragraph (b) and redesignating paragraphs (c), (d), and (e) as paragraphs (b), (c), and (d), respectively, effective October 1, 2003.

4. Revise subpart 8.8 to read as follows:

Subpart 8.8—Acquisition of Printing and Related Supplies

8.800 Scope of subpart.

This subpart provides policy for the acquisition of Government printing and related supplies.

8.801 Policy.

(a) Electronic Print Procurement Capability Certification. An agency is considered to have full electronic print procurement capability if, by acquiring technology that is commercially available in the private sector at the time of the agency's certification request—

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(1) the agency has implemented all of the following functions by means of Internet communication:

(i) provide for vendor qualification and registration as agency approved contractors:

(ii) provide notice to the Government Printing Office (GPO) of the agency's intent to produce a Government publication by means of an in-house or other executive branch printing operations, or of the agency's intent to issue a proposed contract action for a Government publication acquisition from a private sector source, to determine the number of copies of such Government publication the GPO may wish to obtain and to furnish GPO with the capability of ordering such copies no later than the time when the agency orders its copies of the Government publication;

(iii) provide limited notice of proposed contract actions not expected to exceed \$25,000 to assure adequate competition using qualified bidder lists that are automatically rotated;

(iv) provide widespread notice of proposed contract actions expected to exceed \$25,000 by synthesizing such proposed contract actions in the GPE (see 5.101(a)(1) and subpart 5.2);

(v) provide notice of awards and issuance of orders (including price) on all contract actions to all vendors who responded to the proposed contract actions;

(vi) make available to any interested party, on a full cost-recovery basis, copies of all proposed contract actions (and any amendments thereto), no later than the time such proposed contract action (or any amendment thereto) is issued to qualified vendors or synthesized in the GPE;

(vii) make available to any interested party, on a full cost-recovery basis, the following contract action information (including but not limited to individual contract actions and print orders issued under blanket purchase agreements and indefinite-quantity and requirements contracts) in summary or abstracted form as soon as practicable after the contract award, but in no event later than twenty-four (24) hours thereafter: (A) the identification number assigned to each contract action, (ii) the name, address, phone number, and vendor registration number of each winning vendor, and (iii) the quotation, bid, or proposal price, and any prompt payment or other discount, of each contract award.

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(viii) make available to any interested party, on a full cost-recovery basis, the following contract action information (including but not limited to individual contract actions and print orders issued under blanket purchase agreements and indefinite-quantity and requirements contracts) in summary or abstracted form at least once per month: (A) the identification number assigned to each contract action, (B) the bid issuance and opening date; (C) the name, address, phone number, and vendor registration number of each responding vendor, (D) the quotation, bid, or proposal price, and any prompt payment or other discount, offered by each responding vendor, and (E) the amendments acknowledged by each responding vendor.

(ix) issue solicitations, receive responses to solicitations and associated requests for information, and receive and reply to questions regarding proposed contract actions;

(x) issue contract awards and print orders based on the best combination of quality, cost, delivery, and ability to meet production milestones in accordance with objective standards established by the agency or, alternatively, the lowest overall cost in a competition based on cost or price and cost or price related factors;

(xi) track compliance with quality standards, delivery schedules, and production milestones;

(xii) prepare invoicing and make payment to contractors by purchase card, electronic funds transfer, or other automated means; and

(xiii) archive data relating to each contract action and furnish reporting capability with respect to such data.

(2) The head of the agency, with the concurrence of the Administrator of OFPP, has certified to the Director of the Office and Management and Budget that the agency implemented full electronic print procurement capability.

(b) Effective October 1, 2003, Agencies are not required to satisfy requirements for Government printing and related supplies from or through an exclusive source. Agencies may address needs for Government printing and related supplies by—

(1) Contracting with a private sector source, provided that the agency has been certified to have full electronic print procurement capability in accordance with 8.801(a);

(2) Using the Government Printing Office (GPO), in accordance with the requirements of subsection (c); or

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(3) Relying on in-house or other executive branch printing operations, but only where such executive branch operations demonstrate, based upon a full account of all costs and through public-private competition (unless an exception to competition applies), that they offer the best combination of quality, cost, and delivery, and ability to meet production milestones or, alternatively, the lowest overall cost in a competition based on cost or price and cost or price related factors. Prior to proceeding with an in-house or other executive branch printing operation under this paragraph, the agency shall disclose its cost-account findings to the GPO, any vendor participating in the public-private competition, and any interested party requesting such information.

(b)(1) Except as provided herein, ~~in paragraph (2)~~, agencies shall make awards for Government printing in accordance with applicable parts of the FAR, including Parts 5, 6, 10, 12, 13, 14, 15, 17 and 19 and Subpart 8.4.

~~(2)(i) Synopsis and response time. Synopsizing requirements and response times currently applicable to acquisitions over \$25,000 but less than the simplified acquisition threshold (see 5.101(a)(1) and subpart 5.2) shall also apply to acquisitions for printing over \$2,500.~~

~~(ii) Use of Federal Supply Schedules.~~

~~(A) Notwithstanding 8.404(b)(2) and (3), all schedule contractors participating on the schedule for printing shall be given notice using the General Services Administration's electronic quote system, "e-Buy" (www.gsaAdvantage.gov) and an opportunity to compete for any order over \$2,500. Ordering offices shall ensure that—~~

~~(1) e-Buy notices are forwarded to the GPE for publication; and~~

~~(2) the forwarded notice is identified on the GPE as being provided for informational purposes only.~~

~~(B) Any blanket purchase agreement entered into pursuant to FAR 8.404(b)(4) shall not exceed one year in length.~~

~~(iii) Use of indefinite quantity contracts (other than the Federal Supply Schedules) and requirements contracts.~~

~~(A) Contracting officers shall ensure that—~~

~~(1) a notice is forwarded to the GPE for publication before an order for printing is placed under either an indefinite quantity contract or a requirements contract; and~~

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~~(2) the forwarded notice is identified on the GPE as being provided for informational purposes only.~~

~~(B)~~

~~(2) Notwithstanding any other FAR provision, indefinite quantity and requirements contracts (see 16.5) for printing shall not exceed 1 year in length.~~

~~(c) Until January 1, 2004, October 1, 2003, agencies shall continue to utilize both the print production services and print procurement services of GPO in accordance with Title 44 of the United States Code. Beginning October 1, 2003, agencies that have been certified to have full electronic print procurement capability in accordance with 8.801(a) may elect to use the print procurement services of GPO in accordance with Title 44 of the United States Code. agencies may use the services of the GPO without conducting a competition. However, agencies shall not obtain printing services from utilize the print production services of GPO on or after January 1, 2004 October 1, 2003 unless GPO demonstrates through public-private competition (unless an exception to competition applies) that it offers the best combination of quality, cost, and delivery or, alternatively, the lowest overall cost in a competition based on cost or price and cost or price related factors.~~

~~(d) For each Government publication to be printed, the agency shall ensure that GPO has to opportunity to order such copies of the Government publication as it wishes to distribute to the Federal Depository Libraries and any other official use no later than the time when the agency orders its copies of the Government publication; a copy of the publication is provided to the GPO's Superintendent of Documents for distribution to the Federal Depository Libraries and any other official use as may be necessary for the GPO to carry out its responsibilities. When transmitting the publication, the agency shall state that the copy is being provided so that GPO may produce however many copies the Superintendent of Documents has determined are necessary for distribution to the Federal Depository Libraries. Transmission to the Superintendent shall be made using electronic means unless such means are unavailable.~~

~~(e) [RESERVED FOR OMB ANNUAL REPORTING REQUIREMENT] Whenever feasible, the agency should consult with the GPO's Public Printer before issuing a solicitation for a printing acquisition to determine the number of copies of a Government publication the GPO may wish to obtain and the agency shall take reasonable and appropriate steps to assist GPO if GPO wishes to purchase copies from a private contractor employed by the agency.~~

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8.802 Solicitation provision and contract clause.

The contracting officer shall insert the clause at 52.208-XX, Purchases by GPO, in all solicitations and contracts for Government printing of a Government publication where the GPO timely advises the agency before issuance of the solicitation that it will seek to make purchases under the contract.

PART 52—SOLICITATION PROVISIONS AND CONTRACT CLAUSES

5. Add section 52.208-XX to read as follows:

52.208-XX Purchases by GPO.

As prescribed in 8.802, insert the following clause:

Purchases by GPO (Date)

As specified in the contract, the contractor, on written request from the Public Printer of the Government Printing Office (GPO), shall furnish up to [INSERT number] of the following publications [INSERT DESCRIPTION] to the GPO. Invoices for such purchases shall be submitted to the GPO's Public Printer. Payment will be made directly by the Public Printer.

(End of clause)

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Linda K. Nelson
12/16/2002 12:29 PM

To: LaRhonda M. Erby-Spriggs/MVA/CO/GSA/GOV@GSA
cc:
Subject: Fwd: DELIVERY FAILURE: User farcase.2002-11 (
farcase.2002-11@gsa.gov) not listed in public Name & Address Book

LaRhonda,

See below comments for FAR Case 2002-011, GPO. Ms hartman stated that she sent the below comments to the correct email address but the message came back as a "Delivery Failure". Please include her comments with the other comment received. Maybe you can send it to the correct mailbox to be include with the other comments after you have print and put in with the other package of comments.

Linda

----- Forwarded by Linda K. Nelson/MVP/CO/GSA/GOV on 12/16/2002 12:28 PM -----



"Cathy Hartman"
<CHARTMAN@library.unt.edu>
12/16/2002 11:13 AM

To: linda.nelson@gsa.gov
cc:
Subject: Fwd: DELIVERY FAILURE: User farcase.2002-11 (
farcase.2002-11@gsa.gov) not listed in public Name & Address Book

Thank you, Mrs. Nelson. Below is the message I received in response to my attempt to send a comment. Attached is my comment on FAR case 2002-01.

Cathy N. Hartman
Associate Fellow, Texas Center for Digital Knowledge
Head, Government Documents
University of North Texas Libraries
P.O. Box 305190
Denton, TX 76203-5190
chartman@library.unt.edu
Phone: 940-565-3269
Fax: 940-565-2599
Government Information Connection Web Site
<http://www.library.unt.edu/govinfo/>

>>> <Postmaster@gsa.gov> 12/13/02 08:07PM >>>
Your message

Subject: Comments on FAR Case 2002-011

was not delivered to:

farcase.2002-11@gsa.gov

because:

1436

User farcase.2002-11 (farcase.2002-11@gsa.gov) not listed in public Name & Address Book

----- Message from "Cathy Hartman" <chartman@library.unt.edu> on Fri, 13 Dec 2002 20:07:01 -0600

To: farcase.2002-11@gsa.gov

Subject Comments on FAR Case
:2002-011

Comments on FAR Case 2002-011
farcase.2002-11@gsa.gov
December 13, 2002

I am writing in opposition to FAR Case 2002-011. These proposed changes in the Federal Acquisitions Regulations bring up several strong concerns.

I strongly believe that the government has a responsibility to provide equitable, effective, no-fee, efficient and dependable access to and dissemination of Government information in permanent and readily accessible formats. The Federal Depository Library Program has a long history of providing access to government produced information to our citizen in an effective and efficient manner. I also believe that the proposed amendments are a clear violation of 44 U.S.C. §501 since it would authorize agencies to procure their printing outside of GPO. Also troubling are other Title 44 violations that have never been perceived as unconstitutional by any parties involved. For example, the FAR changes propose that GPO should assume the costs of printing and binding of publications for the depository libraries, clearly in violation of §1903.

The FAR proposal to solve the Federal Depository Library Program's "fugitive documents" problem is simplistic and unrealistic. Now, the federal publications that most often are classed as "fugitive" are those printed by agencies that do not use GPO's printing services. The proposed regulation changes offer little enforcement, certainly nothing that will solve this continuing problem.

The FAR proposal states that allowing agencies to handle their own bids for printing services is made with no factual support. In fact, OMB's FEAPMO program encourages centralization of these types of business services so that costs can be kept low. Also, stated in the proposal is the supposition that small printing businesses will be empowered by this change, whereas the reality seems to be that 80% of the bids offers that go out from GPO will no longer in the bid process since they are under the stated \$2,500 limit.

The GPO and the depository libraries have proved over the past century that they are an effective and efficient partnership to ensure that our citizens have open and free access to the publications of their government. I see no defined reasons that make it clear that this proposed change will benefit the people or small businesses and strongly oppose the implementation of these regulations.

Cathy N. Hartman
Associate Fellow, Texas Center for Digital Knowledge
Head, Government Documents
University of North Texas Libraries
P.O. Box 305190
Denton, TX 76203-5190
chartman@library.unt.edu



"David Westerman"
<westy@norwich.edu>
12/13/2002 11:17 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

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COMMENTS:

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal

Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal

Depository Library Program (FDLP) and GPO's Sales Program. The distribution of print and microfiche publications through the FDLP and

GPO's Sales Program ensures that our citizens have current, comprehensive, and permanent access to the federal government information they need. GPO

plays a critical role in providing valuable government information to the public, and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501,

the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes

that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each

publication, because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give

the contracting agencies the direct responsibility for providing copies to

the Superintendent of Documents. Further, the proposed language allows

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agencies to provide GPO with publications in unusable or inappropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means." Agencies could comply with this language by providing copies of documents

in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or

files in formats for which GPO does not have the appropriate software). The proposed language would likewise permit agencies to provide copies of

documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files). Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is

inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight,

or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access

to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for

the FDLP and the Sales Program at low cost. Libraries and individuals depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program.

Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program.

Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you very much for your consideration.



"Derek Slater"
<slater@fas.harvard.ed
u>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/13/2002 11:48 AM

1438

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Derek Slater
2350 Harvard Yard Mail Center
Cambridge, MA 02138
USA



"Fred Sampson"
<wfreds@cruzio.com>
12/13/2002 11:49 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1439

December 13, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Fred Sampson
76 Cutter Dr.
Watsonville, CA 95076
USA

1440



"Fred Moore"
<Fred.W.Moore@nasa.gov>

12/13/2002 11:53 AM

To: farcase.2002-011@gsa.gov, akennedy@mail.hq.nasa.gov, totoole@mail.hq.nasa.gov, corlyss.drinkard@hq.nasa.gov, lgiza@hq.nasa.gov, scottthompson@hq.nasa.gov, kenneth.sateriale@hq.nasa.gov
cc: mcrnkovi@mail.hq.nasa.gov, jadams@mail.arc.nasa.gov, steve.lighthill@mail.dfrc.nasa.gov, shart@pop200.gsfc.nasa.gov, chandler@mail1.jpl.nasa.gov, patricia.a.dickson1@jsc.nasa.gov, Ted.Courson-1@ksc.nasa.gov, C.A.Ryan@LaRC.NASA.Gov, Dennis.V.Dubyk@lerc.nasa.gov, rebecca.c.caneer@msfc.nasa.gov, vince.andres@ssc.nasa.gov

Subject: Implementation Impact Report on Proposed Rule, Federal Acquisition Regulation, Procurement of Printing and Duplicating through the Government Printing Office

In reference to the Proposed Rule, Federal Acquisition Regulation; Procurement of Printing and Duplicating through the Government Printing Office, The NASA Printing Officers would like to offer the attached Implementation Impact Report.

Thank you for the opportunity to comment on these proposed changes. Please feel free to contact me if you have any questions or need further information

Sincerely,
Fred Moore
NASA Printing Officer



301-286-3839 FARcom't.doc

farcase.2002-011@gsa.gov

1440

DATE: December 13, 2002

TO: General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW, Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

FROM: Fred Moore, Agency Printing Officer/NASA

SUBJECT: Comments on the the FAR Council's proposed amendments to the Federal Acquisition Regulation (FAR) to implement the policy set forth in Office of Management and Budget (OMB) Memorandum No. M-02-07, Procurement of Printing and Duplicating through the Government Printing Office (GPO) (May 3, 2002)

These comments are a compilation of opinion from the NASA Printing Officers through the Agency Printing Officer, Mr. Fred Moore. These comments outline areas of concern in the implementation of the proposed changes to the FAR. Procurement of printing and duplicating services from non-GPO vendors will create the following impacts within NASA:

1. Additional funding will be required by each Center to enable non-GPO procurement of printing and duplicating services, in order to address such issues as:
 - a) the human resources NASA needs to replicate functions currently provided by the GPO infrastructure, such as: quality inspections, site visits, capabilities and credit worthiness of vendors, contract compliance by contractors, work tracking, problem and billing error resolution, competitive procurements, advertising printing opportunities, writing contracts, development of guidelines, maintaining databases of contractor services and performance to ensure fair and effective contracting.
 - b) personnel training to acquire dual professional credentials that include procurement and technical (printing and related services) skills, specialized acquisition knowledge of Federal regulations and laws and expert knowledge in contract administration and dispute resolution.
 - c) The expertise to develop or acquire
 1. a "quality assurance through attributes" program (QATAP) like that used by GPO, or an equivalent evaluation system by which printing vendors will be evaluated and refunds or non-payment for poor work is validated
 2. printing contracts

1440

3. an Agency-wide accountability and compliance system for printing procurement
 4. Agency printing program guidelines given the new procurement responsibilities
 5. a very responsive procurement system that does not delay the expected fast completion of printed products. An average of 7,100 print and copy jobs are handled by each NASA Center each year and an average total of \$583K expended by each Center for printing work. The elapsed time is often less than two days to enact a printing procurement. The new system will need to be just as responsive.
2. Probable increase in NASA's printing and duplicating costs, both. indirect and direct

As mentioned in Item 1, the need for additional human resources, training and expertise will result in increased indirect costs to the Agency.

Because the agency would not be taking advantage of GPO's consolidated procuring power and the resulting competition, and because NASA would not be able to manage the breadth of competition that GPO currently provides, direct print prices will be likely to increase. In addition, the printing industry presently sells the Federal Government largely to one entity. It will cost more for industry to sell to a variety of entities. This increase in costs will be passed on to NASA

Direct costs will also be impacted by printing and other technical expertise which may be required to assist in the production of many of NASA's prestigious space publications to meet NASA's requirement for fidelity of reproduction and color. GPO currently assists in this effort by conducting pre-award surveys of prospective contractors and through on-site press inspections that require special skills as well as technical review and troubleshooting of complex print files. GPO also conducts tests on printing substrates, the use and stability of various inks and varnishes, and other unique technical requirements NASA may require.

The Agency is currently responsible to pay for the copies required for the Depository Library Program if the product is not printed through the GPO. (Title 44, US Code Sections 1901-1903 and OMB Circular A-130) This rule would need to change. NASA customers will balk at paying for copies above their needs

3. Potential loss of tracking and reporting data. Accurate annual reporting data of all printing, duplicating and copying cost data is required by the Office of Management and Budget (OMB Circular A123, "Internal Control Systems"), NASA guidance (NPG 1490.5A, "NASA Procedures and Guidelines for Printing, Duplicating, and Copy Management") and the President's Government Performance and Results Act as an integral part of management oversight and accountability of the agency's printing costs and products. Although nowhere

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does this proposal actually say that individuals might buy printing on their own recognizance, the FAR changes proposed may be interpreted that way by employees and printers alike. If this should happen it will negatively affect the ability to track true printing costs and other data.

4. Such an interpretation would raise a similar risk with submitting copies of each document to the Depository Library Program as required by Title 44, U.S. Code, Sections 1901-1903 and OMB Circular A-130. The occurrence of fugitive documents is likely to increase as well as the chance that copies for the Depository Library Program will not be procured.
5. An additional concern is the potential for avoiding Federal mandates to use Recycled paper, and government-approved papers, which conserve resources and save money. There are many exotic papers available in the open market which may or may not add visual interest to the product but will certainly add cost. Generally the federal government does not wish to appear to spend taxpayers' money on unneeded "upgrades"

In summary, it is the opinion of the NASA Printing Officers and the Agency Printing Officer, that, regardless of the change in law, at minimum all NASA printing, duplicating, and copying procurement should be procured and processed through the NASA print procurement department at each Center for "Best Value Procurement" and access to all technological and professional support to acquire the best product..All Agency entities paying with appropriated funds, including NASA contracts and grants should procure printing in the same manner. Handled centrally, the process would enable the collection of complete, accurate, and mandatory data for the Agency and also ensure that the Superintendent of Documents will get an electronic copy of each NASA printed publications.

It would seem to the Printing Officers that there will need to be an infrastructure of some sort to fulfill the need for fast and simple procurement of quality print from vetted vendors to serve NASA, the Department of Defense and GSA. Parts of the GPO role may be picked up by each agency to make this ruling effective and efficient, but in our professional opinion it does not appear that "freedom to choose" will provide cheaper printing.

1441

December 6, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F St., NW
Room 4035
Attention: Laurie Duarte
Washington, DC 20405

Concerning FAR Case 2002-011

Dear Sir or Madam:

I am writing today to oppose the current administration's proposed plan to shift printing away from the Government Printing Office (GPO). I am a law librarian with a specialty in government information. I have worked in this area for over 30 years and I feel this move is extremely misguided.

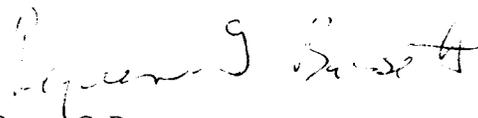
The Government Printing Office and the Federal Depository Library Program have been an important source of information to U.S. citizens for many years. This particular move has been attempted in the past and thankfully not adopted. When federal agencies do not distribute information through the GPO program, "orphan" documents exist where scholars and researchers cannot locate copies of these important materials. As a law librarian who uses both electronic and hardcopy government materials I can testify to cases of incorrect information put on Web pages and U.S. documents that just disappear. I have recently been working with a law professor (I work for Northwestern University's Pritzker Legal Research Center) who was writing an article and used congressional testimony from a committee web site. When she went back to the website the information was no longer there. I am a strong supporter of electronic government information, but I also feel that a centralized printer and distributor of government documents like the Government Printing Office is critical not only for quality control but also for documentation.

As far as savings cost through outsourcing, I understand that the Government Printing Office already farms out over 84% of its printing to smaller printers.

I also feel that FAR Case 2002-011, which would allow executive agencies to procure their publication printing without using the Government Printing Office, is a violation of several sections of Title 44 on printing.

I also feel that this poorly thought out OMB proposal (document 2002-26) does not consider the efficiencies, control, and expertise built into a centralized system of printing through the Government Printing Office.

Sincerely,



Pegeen G. Bassett
2046 Wilmette Avenue
Wilmette, IL 60091

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**"Walker, Michael
(NIH/OD)"**
**<WALKERM@od6100m
1.od.nih.gov>**

To: "farcase.2002-011@gsa.gov" <farcase.2002-011@gsa.gov>
cc:
Subject: FW: Consolidated comments from the National Institutes of Health.

12/16/2002 08:00 AM

> -----Original Message-----
> From: Walker, Michael (NIH/OD)
> Sent: Monday, December 16, 2002 7:59 AM
> To: Cc: Hamill, Rosemary (NIH/OD)
> Subject: Consolidated comments from the National Institutes of
> Health.
>
> Consolidated comments from the National Institutes of Health.
>
> The following comment was received after distribution of the above
> referenced Federal Register Notice and is submitted for your
> consideration:
>
> The proposal to go to all holders of a new GSA schedule contract for
> printing for any requirement over \$2500 will be overly burdensome. It is
> not clear why the \$25,000 limit for other requirements cannot be used.
> Contractors in other industries will want the same consideration.
>

1443

December 6, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW, Room 4035
Attn: Laurie Duarte
Washington, DC 20405

Re: FAR case 2002-011

I am writing in opposition to the proposed amendments to the Federal Acquisition Regulation (FAR) regarding printing outside of the Government Printing Office (GPO).

As a librarian, I am very concerned about preserving public access to government information. The proposed FAR has the potential to greatly reduce citizens' access to information by removing it from the main disseminator of government information, the Government Printing Office.

First, the proposed FAR is a violation of 44 U.S.C. §501 (requiring agencies to send printing to GPO), §1903 (requiring agencies who procure outside of GPO to bear the costs of printing and binding the necessary copies for distribution to depository libraries), and §1710 (requiring agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes).

Second, aside from being a violation of law, there is no evidence that the proposed FAR will, in fact, save taxpayer money. It appears designed to benefit publishers, not the general public. The Office of Management and Budget's claims that GPO is inefficient are unsupported.

Third, oversight is necessary to ensure that agency publications in all formats are permanently accessible by the public. The FAR amendment makes no provision for requiring agencies to provide permanent public access. Government information will appear and disappear at the whim of each agency, and every time there is a change in administration, the slate will be wiped clean.

Fourth, Congressional oversight is needed to ensure that agencies meet their legal obligations to provide copies of documents to the Superintendent of Documents. Currently, many agencies fail to send copies of documents to GPO, and their compliance will be even worse under the proposed FAR.

General Services Administration
December 6, 2002
Page 2

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The government must do its utmost to disseminate taxpayer-financed information to the general public and especially to federal depository libraries. The proposed FAR is a step in the opposite direction.

Thank you for your consideration.



Gwen Sinclair
3815A Mariposa Dr.
Honolulu, HI 96816-3915

- c: Senator Daniel Inouye
- Senator Daniel Akaka
- Representative Neil Abercrombie
- Representative Ed Case



"Robert Sheets"
<maniac@earthling.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/16/2002 09:22 AM

1444

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Robert Sheets
364 W. Lane Ave. #509
Columbus, OH 43201
USA



"Catherine Swenson"
<catherin@norwich.ed
u>

To: farcase.2002-011@gsa.gov
cc:
Subject: FAR Case 2002-011

1/4/5

12/16/2002 09:33 AM

I am in agreement with the following. The present Federal Depository Library Program should be maintained to allow adequate access by the public to government information. Thank you.

>
>-----
>I write to provide comments on FAR Case 2002-011, amendments proposed by
>
>the Office of Management and Budget to 48 CFR Parts 6, 8, and 52,
> "Federal Acquisition Regulation; Procurement of Printing and
>Duplicating Through
> the Government Printing Office" (GPO). I strongly urge that these
> amendments not be adopted, because they would significantly limit
>public
>access to federal government information by drastically reducing the
> number of federal documents distributed to the public through the
> Federal Depository Library Program (FDLP) and GPO's Sales Program.
> The distribution of print and microfiche publications through the FDLP
> and GPO's Sales Program ensures that our citizens have current,
> comprehensive, and permanent access to the federal government
>information they need.
> GPO plays a critical role in providing valuable government information
>to the public,
>and indexing and preserving that information for the future.
>
> I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8,
>and
>52 not be adopted, for the following reasons:
> First, the proposed amendments clearly violate current law that is
> designed to ensure permanent and reliable public access to federal
>government information. Although OMB cites legal opinions by the
> Department of Justice to support the abrogation of 44 U.S.C. Section
> 501, the proposed amendments also violate other federal statutes, whose
>constitutionality the Department of Justice has never questioned,
> statutes that guarantee public access to federal government
>information.
>OMB's proposed amendments violate the federal statute that requires
>agencies
> procuring outside of GPO to bear the costs of printing and binding the
> necessary copies for depository libraries (44 U.S.C. Section 1903). In
>
> addition, the proposed regulation violates the statute that requires
> agencies to supply a copy of all publications to the Superintendent of
> Documents for cataloging purposes (44 U.S.C. Section 1710), because the
>
> vague proposed wording ("each agency shall ensure a copy of the
> publication is provided...") does not explicitly give the contracting
> agencies the direct responsibility for providing copies to the
> Superintendent of Documents.
>
> Second, OMB's proposed amendments would exacerbate the problem of
> "fugitive documents." As noted above, the proposed regulation absolves

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>
> the agencies from paying for and providing to GPO the legally-required
> number of copies of each publication for distribution to Federal
> Depository Libraries. Also as previously noted, agencies could easily
> avoid the requirement to provide one electronic copy of each
> publication, because the vague wording of the proposed amendment
> ("each agency shall ensure a copy of the publication is provided...")
> does not explicitly give the contracting agencies the direct
> responsibility for
> providing copies to the Superintendent of Documents. Further, the
> proposed
> language allows agencies to provide GPO with publications in unusable or
> inappropriate
> formats. The proposed language requires only that each publication be
> transmitted to the Superintendent of Documents "using electronic
> means."
> Agencies could comply with this language by providing copies of
> documents in electronic formats that are unusable or impractically
> labor-intensive
> to use (for example, corrupted files, raw data files, ASCII text files,
> or files in formats for which GPO does not have the appropriate
> software).
> The proposed language would likewise permit agencies to provide copies
> of documents that have structures that are impractically
> labor-intensive to
> use (for example, a 2,000 page report issued as 300 separate PDF
> files).
> Moreover, the proposed language fails to require agencies to provide
> GPO
> with tangible copies of publications for which electronic dissemination
> is
> inappropriate, such as very large format publications (for example,
> atlases) or publications containing illustrations that require complex
> color reproduction (for example, maps, scientific reports containing
> detailed photographs or diagrams, and posters). The failure of the
> proposed amendments to require provision of publications in usable and
> appropriate formats jeopardizes not only the current distribution of
> documents, but also the long-term preservation of documents for future
> use. Finally, the proposed amendments lack specific reporting,
> oversight, or enforcement measures to ensure agency compliance with
> legal
> requirements to provide copies of publications to GPO for the FDLP.
> Because of these flaws the proposed amendments would result in more
> fugitive federal publications, not fewer. The proposed regulation
> would
> allow agencies, freed from oversight by OMB or Congress, to avoid
> providing publications for the FDLP.
>
> Third, the proposed amendments would seriously weaken GPO's Sales
> Program, upon which millions of Americans depend, particularly for
> access to legal information. Under the present system the
> Superintendent of
> Documents can augment agency procurement orders to obtain publications
> for the FDLP and the Sales Program at low cost. Libraries and
> individuals
> depend on the Sales Program to purchase print federal primary legal
> materials that may be provided to depository libraries only in an
> unofficial, electronic version. The proposed rules do not adequately
> provide
> for a continued, cost-effective Sales Program. Federal law gives GPO
> primary

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>responsibility for providing public access to federal government
>information
>through the FDLP and the Sales Program. Federal law ensures that federal
>
>government information printed throughGPO is indexed, distributed free
>of charge to the public in usable andappropriate formats, and preserved
>for
>future use. Information professionals say that this system provides
>"permanent public access" to federal government information. Today, the
>
>Superintendent of Documents provides reliable, efficient, cost-effective
>
>and accountable permanent public access to federal government
>information
>through the FDLP and the Sales Program. OMB's proposed regulation
>would severely damage the current, effective system, and significantly
>reduce Americans' access to federal government information. I therefore
>
>strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and
>52
>not be adopted.
>
>Thank you very much for your consideration.
>
>>
>
>
>

Catherine Swenson, Coordinator of
Technical Services
Kreitzberg Library, Norwich University
23 Harmon Drive
Northfield, VT 05663

PHONE: (802) 485-2171 FAX: (802) 485-2173

----- Message from "Lise Albury" <lalbury@norwich.edu> on Fri, 13 Dec 2002 13:26:54 -0500 -----

To: "betty@norwich.edu"

<betty@norwich.edu>,
"annettew@norwich.edu"
<annettew@norwich.edu>,
"catherin@norwich.edu"
<catherin@norwich.edu>,
"deboraha@norwich.edu"
<deboraha@norwich.edu>,
"dianac@norwich.edu"
<dianac@norwich.edu>,
"ehall@norwich.edu"
<ehall@norwich.edu>,
"ellin@norwich.edu"
<ellin@norwich.edu>,
"gsauer@norwich.edu"
<gsauer@norwich.edu>,
"lamondaj@norwich.edu"
<lamondaj@norwich.edu>,

"jfritz@norwich.edu"
<jfritz@norwich.edu>,
"kainswor@norwich.edu"
<kainswor@norwich.edu>,
"lorettaq@norwich.edu"
<lorettaq@norwich.edu>,
"huntt@norwich.edu"
<huntt@norwich.edu>, "Ann Turner"
<annt@norwich.edu>, "Lisa Allard"
<lallard@norwich.edu>

12/4/5

Subject: gentle reminder...

Hi all,
some of you have let me know that you sent your comments in. If you haven't.... this is a very serious threat to the depository system, and I'm counting on your help. please just forward the below to this address:

farcase.2002-011@gsa.gov - by TODAY, citing "FAR Case 2002-011" in the subject line

thanks!
Lise

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program. The distribution of print and microfiche publications through the FDLP and GPO's Sales Program ensures that our citizens have current, comprehensive, and permanent access to the federal government information they need. GPO plays a critical role in providing valuable government information to the public, and indexing and preserving that information for the future.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:
First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information.
OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In

1445

addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the

vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves

the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendment ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for

providing copies to the Superintendent of Documents. Further, the proposed

language allows agencies to provide GPO with publications in unusable or inappropriate

formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means."

Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive

to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software).

The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to

use (for example, a 2,000 page report issued as 300 separate PDF files).

Moreover, the proposed language fails to require agencies to provide GPO

with tangible copies of publications for which electronic dissemination is

inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal

requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would

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Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for

1445

access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Libraries and individuals depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program. Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program. Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

Thank you very much for your consideration.

>



"Jeffri Frontz"
<jhf@infinet.com>
12/16/2002 09:52 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1446

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am concerned about FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically,

I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Jeffri Frontz
310 Walhalla Rd
Columbus, OH 43202
USA



"Christopher Caldwell"
<caldwell@gwu.edu>
12/16/2002 12:31 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Christopher Caldwell
541 1/2 9th St SE
Washington, DC 20003
USA

12/17



"Keith Menard"
<kmmenard@cox.net>
12/16/2002 01:27 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1448

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Keith Menard
15110 Newport Ave.
Omaha, NE 68116
USA



"Chris Ingram"
<chris.ingram@acm.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 02:35 PM

1449

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Chris Ingram
244 Valley Ridge Drive
Roswell, GA 30075
USA



"Sean Forbes"
<forbessean@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 02:41 PM

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Sean Forbes
280 Shelby Lane
Ladonia, TX 75449
USA

1450



"Chris Vesper"
<chris@vesper.net>
12/16/2002 02:41 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1431

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Chris Vesper
3272 Country Walk Drive
Powder Springs, GA 30127
USA

1452



"Francine Goldberg"
<FFG@nrc.gov>

12/16/2002 03:08 PM

To: farcase.2002-011@gsa.gov
cc: "Guy Wright" <GGW@nrc.gov>, "Loralee Gillis" <LCG@nrc.gov>,
"Melinda Malloy" <MXM@nrc.gov>
Subject: Comments from the Nuclear Regulatory Commission

Ms. Duarte -

I spoke with you earlier last week regarding a possible delay in getting NRC's comments to you by Friday on the subject rule. On Friday, you received an e-mail from Tina Higginbotham promising comments from us today. I apologize, but we are still working on getting them to you. They are with our Executive Director for Operations for approval. As soon as we get that approval, I will e-mail them to you.

Fran Goldberg



"Gerald Peterson"
<gempeter@iupui.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 03:49 PM

1453

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Gerald Peterson
4601 Winthrop Ave
Indianapolis, IN 46205
USA



"Kenneth Winke"
<kwinke@earthlink.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 05:02 PM

1454

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kenneth Winke
3504 North Wilton Avenue
Apt 2F
Chicago, IL 60657
USA



"David Andrade"
<ws5e@yahoo.com>
12/16/2002 05:04 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Andrade
17 Royal Ave
Buffalo, NY 14207
USA

1455



"Trey Harris"
<trey@sage.org>

12/16/2002 06:18 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1456

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Trey Harris
305 W 50th St
Apt. 8C
New York, NY 10019
USA



"Michael Barnes"
<action@erinandmike.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 07:26 PM

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Michael Barnes
3305 Shasta Dr
San Mateo, CA 94403
USA

1457



"Gregory Walson"
<gryphon-eff@unscent.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 07:50 PM

1458

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gregory Walson
62 Albion Street
Somerville, MA 02143
USA



"Jonathan Webb"
<frost@insightbb.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 07:56 PM

1459

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Jonathan Webb
7401 Old North Church Rd
Louisville, KY 40214
USA



"David Lisch"
<david_0704@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 08:56 PM

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Lisch
141 Doverfield Dr.
Placentia, CA 92870
USA

1460



"Lawrence Peters"
<odhardware@aol.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011
>

12/16/2002 10:38 PM

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Lawrence Peters
6 Rainbow Dr
Riverside, CT 06878
USA

1401



"Eric Lynn"
<eric@beatic.com>
12/16/2002 10:43 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

14/62

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Eric Lynn
4117 Iroquois Dr
Madison, WI 53711
USA



"wendy zapert"
<wendyheaphy@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 11:18 PM

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

wendy zapert
195 Coquina Ave.
Ormond Beach, FL 32174
USA

12/16/02



"Sean Jones"
<sjjones2000@attbi.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/16/2002 11:42 PM

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Sean Jones
6345 Barwick Ln
Duluth, GA 30097
USA

1404



"Chris Aquino"
<lucid@mochamail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/17/2002 01:53 AM

1465

December 16, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Chris Aquino
2024 Goss St. Apt 6
Boulder, CO 80302
USA



"Carter Brown"
<carter@mcarterbrown.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/17/2002 09:56 AM

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

1466

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Sincerely,

Carter Brown
389 Whittington Street
Manchester, NH 03104
USA



"Beth Milliken"
<beth@mindspring.net
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/17/2002 10:20 AM

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Beth Milliken
2533 Flair Knoll Dr NE
Atlanta, GA 30345
USA

1467



"Luke Nelson"
<artimage@ishiboo.com>

12/17/2002 11:09 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1468

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Luke Nelson
268 E Broadway
apt 907
New York, NY 10002
USA



"Ben deGonzague"
<duffman@nycap.rr.co
m>

12/17/2002 02:39 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1469

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Ben deGonzague
15 Gail Lane
Latham, NY 12110
USA



"Michael Bernstein"
<webmaven@lvcm.com>
m>

12/17/2002 02:28 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/70

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Michael Bernstein
4009 Evesham Court
Las Vegas, NV 89121
USA



"David Lewis"
<davelewisidx@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/17/2002 02:15 PM

12/17/02

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

David Lewis
11926 SE Redhawks Lane
Portland, OR 97236
USA



"Todd Pinkerton"
<toddp@birch.he.net>

12/17/2002 12:20 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1492

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Todd Pinkerton
9 Cedar St #3
Somerville, MA 02143
USA



"John Hughes"
<john@fallenbit.com>
12/17/2002 11:54 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1493

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

John Hughes
455 W 46th St Apt 5A
New York, NY 10036
USA



**American
Foundation
for the Blind**

Governmental Relations Group
820 First Street, N.E., Suite 400
Washington, DC 20002
202.408.0200
Fax: 202.289.7880
afb.gov@afb.net
<http://www.afb.org/gov.asp>

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

RE: FAR Case 2002-011

Dear Ms. Duarte:

The American Foundation for the Blind, AFB, is pleased to submit Comments in response to the November 13, 2002 Notice of Proposed Rule which makes changes to the Federal Acquisition Regulation; Procurement of Printing and Duplicating through the Government Printing Office (GPO). The proposed changes would provide for competition for printing contract requirements for government agencies rather than the exclusive use of the Government printing Office to fulfill government printing requirements. Under these procedures, agencies would be required to follow competitive bid processes for printing contracts in excess of \$2,500. These changes raise a variety of questions relative to the requirements of section 508 of the Rehabilitation Act (67 Federal Register 43524).

The mission of the American Foundation for the Blind, Helen Keller's cause in the United States, is to help people who are blind or visually impaired achieve equality of access and opportunity that will ensure freedom of choice in their lives. Since 1921, AFB has pursued the dream of a world where the major inequities faced by blind or visually impaired people are eliminated or substantially reduced. Today, AFB continues as the nation's leading resource for people who are blind or visually impaired, their families and the professionals who serve them. AFB has a long history of involvement with Section 508 from the drafting of original amendment language to its membership of the Electronic and Information Technology Access Advisory Committee. AFB is working as a stakeholder on the Accessibility Forum and serves on its Strategic Council and its Interoperability Project Team.

Section 508 of the Rehabilitation Act, as amended (29 U.S.C. 794d), requires the Federal Government to buy **electronic and information technology (E&IT)** that is accessible to government employees and, in some cases, private citizens with disabilities. In April 2001, the Defense Acquisition Regulation Council and the Civilian Agency Acquisition Council (together, the Councils) published regulations implementing the Section 508 amendments, to go into effect two months later. In a speech at the Pentagon, President George W. Bush marked the occasion by designating Section 508 as an Administration priority, emphasizing its importance in helping to achieve his vision of treating Americans with disabilities as people to be respected, rather than problems to be confronted. We strongly support the President's commitment to this program. AFB has worked and continues to work with committed individuals both inside and outside the government to help make the President's vision a reality.

Summary

The Federal Acquisition Regulation (FAR) Council proposes to change its regulations consistent with OMB Memorandum M-02-07, to induce competition, save the taxpayer and promote small business opportunity, by providing for competitive process to find the best value for agency printing procurements. Under these procedures, agencies would be required to use **competitive processes** to procure printing jobs costing in excess of \$2,500 and to otherwise find the best value by considering private and governmental sources. The changes further claim to improve depository library systems by taking concrete steps to ensure that all documents are provided to the GPO superintendent of documents for distribution to the depository libraries.

Issues

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We have concerns about the proposed changes to the regulations which we believe need to be addressed.

- Who will be responsible for providing the accessibility required by Section 508 and other relevant laws?
- What are the concrete steps to ensure that documents are provided to the GPO superintendent of documents and the Federal Depository Libraries?
- What time frame is provided for in these concrete steps and how will the public be assured that these documents are provided in an accessible format to the superintendent and subsequently to the depository libraries?
- What are the enforcement provisions for these proposed rules to assure that the deliverables meet the section 508 requirements? I.e. who has standing and to whom would persons address complaints?
- What are the enforcement provisions to ensure that the deliverables are provided to the GPO and to the Federal Depository Libraries? I.e. who has standing and to whom should they address any complaints?

The following are comments and solutions to the questions posed which we believe address are concerns and should be likewise addressed in any changes to the FAR.

Since these procurement contracts for printing are subject to all procurement statutes and regulations including section 508 of the Rehabilitation Act, all documents/printed products must provide comparable access for disabled persons to that afforded persons without disabilities. We believe that the proper way to provide such comparable access is to create in the documents/products with the accessibility built into the original product. To the extent that the documents are created electronically, and we believe this should be all documents, they must be compliant with the Section 508 standards. The Federal Government has made great strides in learning to develop accessible documents, and web pages over the past year and a-half. There is still room for improvement.

Our concern is that, the disabled community would be denied access to information while the contractors develop the necessary expertise to provide access or, that any access which would be provided would not be comparable to the provided to persons without disabilities. We believe that the contractors should be required to provide the accessibility and not have such accessibility built in retroactively. Providing accessibility retroactively would cost the government and therefore the tax payers more money and serve to delay our access to information thus not giving us comparable access. We believe that all electronic documents should contain structural mark-up and flexible presentation technology such as ANSI Z39.86-2002. (See <http://www.loc.gov/nls/z3986> for further information.) This technology provides a foundation for easy creation of textual, auditory, combination of textual and auditory, easily translated into Braille, and allows for the inclusion of graphics and pictures as well. We believe that this technology achieves the goal of section 508 and this administration by respecting disabled persons' needs and not treating them as problems to be confronted. By creating documents which are designed in an accessible format disabled persons can be assured prompt, effective access to their government's documents in a timely and appropriate manner along with other citizens thus ensuring that our government achieves the best value for the tax dollar.

We are concerned if attention to proper design is not given these documents would be presented on web pages in some format which does not provide comparable access to disabled persons such as Portable Document Format (PDF). Earlier this year the AFB joined to other blindness organizations in developing a whitepaper which outlines our concerns about the use of PDF's as a method of achieving 508 compliance. This document can be found at <http://www.afb.org/aboutpdf.asp>. It is also attached for your convenience. Some of the problems with PDF presentations are that they do not afford the general disabled public comparable access since this format is dependent on a specific operating system/platform, a specific version of assistive technology, thus placing a heavier economic burden on a population which already has a 70% unemployment rate, and because there are problems in creating the PDF documents which can result in an inaccessible version or one that blocks access because of permission settings within the security levels set by the author of the document. If documents are created using a technology such as that provided by the ANSI Z39-86-2002, the documents are not operating system or platform dependent and can easily be converted into audio recording or Braille formats.

We applaud the GPO's long history of providing accessible copies of its documents on the web even before the passage of section 508. Today, even though, unlike federal agencies, it is not required to do so under Section 508 of the Rehabilitation Act, GPO continues to provide access to its documents without the use of PDF's. In addition, the GPO has recently taken steps to add the ability to create accessible publishing formats to its list of core competencies. Again, this is beyond its legal responsibility. WE believe that it would not be in the best interest of the tax payers to divert printing jobs to other sources

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which do not have this competency and for whom this would mean additional time to develop the skills and create additional costs to the contractor. In short, it has taken a long time to gain what level of competency there is to provide access to E&IT, we don't believe that the tax payers, specifically disabled tax payers, will receive the best value if we have to take steps backwards in gaining access or stand still while contractors get up to the level of expertise already possessed by the GPO.

We are also concerned about the enforcement of these proposed regulations. What enforcement safe guards are there to assure that the E&IT is accessible and further that these deliverables are, in fact, provided promptly to the GPO and to the Federal Depository Libraries? Rights with remedies will afford the disabled community nothing more than empty assurances.

Another concern relates to whether copies of the documents procured by agencies would be provided to the Superintendent of Government Documents immediately upon their completion. If the copies are not provided promptly the public access would be delayed since they would not be able to be posted on the GPO web site or placed in the depository libraries throughout the country. If documents are not promptly provided then the public could not become aware of agencies activities or provide comments and raise concerns. If the documents which are provided to the Superintendent of Government Documents are not created in an accessible format, it would mean an additional burden to the Superintendent, and disabled persons would not have comparable access due to any delays and their rights as tax paying citizens would not be respected. This would not achieve the Administration's goal of treating persons with disabilities with respect and not as problems to be confronted. It would also not be the best value for the tax payer dollar.

Thank you for your attention to these concerns. We are certain that these issues will be addressed by the final changes in the regulations and look forward to a reflection of these in the subsequently published final regulations.

Sincerely yours,

Joy Relton,
Governmental Relations Representative
American Foundation for the Blind
820 1st Street NE Suite 400
Washington, DC 20002
202-408-8170
jrelton@afb.net

1475



"Tim Smith"
<tsmith@newtechhigh.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/18/2002 12:20 AM

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Tim Smith
34 Jacks Ln
Napa, CA 94558
USA



"Greg Hard"
<greghard@h-realms.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1496

12/17/2002 10:33 PM

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Greg Hard
24 Essex St
Weymouth, MA 02188
USA

1477



"Benjamin Gross"
<ben_gross@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/17/2002 08:40 PM

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Benjamin Gross
1138 Buckingham Dr
Apt E
Costa Mesa, CA 92626
USA



"David Power"
<dpower@hal-pc.org>
12/17/2002 08:29 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1478

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

David Power
22006 Grand Forks Dr
Katy, TX 77450
USA



"Rob Nichols"
<rob@robnet.com>
12/17/2002 08:10 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1499

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Rob Nichols
1500 Green Mountain Drive
Little Rock, AR 72211
USA



"Rohan Singh"
<rohan@fuzzelfish.com>

12/17/2002 07:41 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1480

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Rohan Singh
18133 NE 185th Pl
Woodinville, WA 98072
USA



"avery roberts"
<AveryRoberts@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/17/2002 03:10 PM

December 17, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

avery roberts
1919 w north a st
Tampa, FL 33606
USA

12/81



Washington, D.C. 20201

General Services Administration
FAR Secretariat (MVA)
1800 F Street N/W, Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

December 12, 2002

Dear Ms. Duarte:

Reference is made to the proposed rule on "Procurement of Printing and Duplicating Through the Government Printing Office," that was published in the November 13, 2002, Federal Register. The comments of the Department of Health and Human Services are set forth below.

We are concerned about the administrative burden that will be imposed on federal agencies as a result of this rule. The \$2,500 threshold for publishing in the FedBizOps is far below the standard threshold of \$25,000, and will result in significantly added costs for procuring printing requirements. All other requirements are at the \$25,000 threshold.

In addition, contracting personnel are required to go to three vendors under the Simplified Acquisition Threshold of \$100,000. This proposed rule requires that if and when GSA schedules are created, and agencies choose to use them, all schedule contractors participating in the schedule for printing shall be given notice using the General Services Administration's electronic quote system "e-Bay". Again, this is contrary to all other procurements and will create an excessive administrative burden.

Also, notification is required to the GPE for orders under Indefinite Quantity or Requirement contracts. This too is contrary to requirements for all other Indefinite Delivery or Requirement contracts. Further, Indefinite Delivery contracts are limited to one year. This will create an administrative challenge especially since there has been a decrease in the ranks of contracting personnel. Finally, agencies do not have staff trained in printing. We, along with the rest of the Government, would have to add staff and train them in the nuances of printing procurements.

We believe that agencies will either opt to go to the Government Printing Office or have their contractors be fully responsible for printing needs during the one-year moratorium, since the new procurement rules on printing are so burdensome.

We believe that the requirements for printing procurements should be the same as for other procurements. We hope to see changes in the final rule. Please call me at (202) 690-7960 if you have any questions regarding the above.

Sincerely,

Niels L. Holtet, Acting Director
Office of Acquisition Management

CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA

011-1483

R. BRUCE JOSTEN
EXECUTIVE VICE PRESIDENT
GOVERNMENT AFFAIRS

1615 H STREET, N.W.
WASHINGTON, D.C. 20062-2000
202/463-5310

December 13, 2002

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

RE: FAR Case 2002-011
Federal Acquisition Regulation; Procurement of Printing and Duplicating Through
the Government Printing Office; Proposed Rule

Dear Ms. Duarte:

The U.S. Chamber of Commerce appreciates the opportunity to comment on the proposed amendment to the Federal Acquisition Regulation (FAR) to implement the policy set forth in Office of Management and Budget (OMB) Memorandum No. M-02-07, Procurement of Printing and Duplicating Through the Government Printing Office (GPO) (May 3, 2002) as published in the *Federal Register* on November 13, 2002 (67 Fed. Reg. 68913). The U.S. Chamber of Commerce is the world's largest business federation, representing more than three million businesses and professional organizations of every size, sector and region of the country.

The Chamber fully supports the proposed rule as it seeks to induce competition, save taxpayer money and promote small business opportunities by eliminating restrictions that mandate the use of GPO as the single source and frees agencies to select printing from a wide array of sources that can demonstrate their ability to meet the Government's needs most effectively. Government monopolies, such as GPO, unfairly penalize the American taxpayer and our nation's businesses and sacrifice government efficiency.

The Chamber has a long-standing policy that the government should not produce goods and services for itself or others if acceptable privately owned and operated services are or can be made available for such purposes. The government saves billions of dollars by partnering with the private sector yet continues to perform countless commercial services despite the fact the private sector has continually proven it can provide the same functions at a lower price, higher quality and faster delivery time. While GPO does currently contract a portion of the government's printing to the private sector, the Chamber

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believes reform can lead to greater savings by allowing the federal government to obtain the best value it can for taxpayer dollars while providing increased opportunities and profitability for the private sector.

Allowing federal agencies to procure printing services using a best value cost-technical tradeoff system will enable each individual agency to control the cost and quality of the printing services for which they are held accountable. Under the proposed rule, they will be allowed to make procurement decisions based on the best quality, cost, and time of delivery available to meet their needs. While price is a critical factor in contracting decisions, the taxpayer and efficient operations are disadvantaged when the government is required to ignore important factors like quality and speed of service.

The amended rule removes restrictions in the Federal Acquisition Regulation (FAR) Part 8.8 that have mandated exclusive use of GPO for printing. The proposed rule provides agencies express authority to address their own printing needs by contracting with the private sector, using GPO, or, in very limited circumstances, relying on in-house or other Executive Branch printing operations. The Chamber wants to be certain that the new policy does not result in increased in-house printing operations, which would further limit private sector participation. We are pleased to see the new rule provides for limitations of in-house operations by permitting agencies to use such operations only when it can be demonstrated, based on a full account of all costs and through public-private competitions, that the best quality, price and timeliness of delivery can be obtained in-house. We urge the Administration to monitor the level of in-house operations.

The Chamber supports the intent of the rule to increase the flexibility afforded to federal agencies in printing and print procurement decisions, while we are sensitive to ensuring the largest number of companies, especially small businesses, have access to bidding opportunities. Therefore, we support including all printing contracts in excess of \$2,500 on the Government-wide gateway on the Internet for federal business opportunities, www.FedBizOpps.gov. Maximizing opportunities for all businesses to bid on federal contracts on a level playing field is a major priority for the Chamber.

Thank you for the opportunity to submit these comments on behalf of our members, large and small, that rely on an efficient, fair, competitive process in providing the federal government with goods and services to maintain and grow their businesses.

Sincerely,



R. Bruce Josten



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 17, 2002

011-1484

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW, Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

Dear Ms. Duarte:

The Nuclear Regulatory Commission's (NRC) comments on the proposed FAR Rule, "Procurement of Printing and Duplicating Through the Government Printing Office" (FAR case 2002-011) are provided below. The NRC's modest printing requirements currently are met by private sector business contracts awarded through the Government Printing Office (GPO). We are concerned that the changes proposed in the new rule will affect the efficiency and effectiveness of our printing services.

1. It is unclear as to the affect of the proposed regulations on the continued performance of printing efforts under existing GPO contracts. Will agencies be allowed to continue to obtain these services under their existing GPO contracts until these contracts expire? Can agencies still use GPO for annual direct-deal term contracts?
2. The proposed rule creates a unique competitive environment only for printing services. It deviates from the Federal Acquisition Regulation (FAR) in three areas by requiring that: (1) all Federal Supply Schedule printing contractors be given an opportunity to compete for agency orders in excess of \$2,500; (2) all open market printing requirements in excess of \$2,500 be synopsisized in FedBizOpps; and (3) the length of awards for printing services be limited to 1 year. The NRC urges the Federal Acquisition Regulation Council to apply the FAR's current competitive and synopsis requirements to printing services. Under the proposed rule, Federal printing requirements cannot be conducted according to rules applicable to open market acquisitions (i.e., FAR Parts 5, 6, 10, 12, 13, 14, 15, 17) or Federal Supply Schedule (i.e, FAR Part 8). Thus, the proposed rule has the potential to confuse businesses seeking a consistent understanding of how to do business with the Government. The reason for these deviations have not been clearly articulated, hence, the benefits of the proposed change cannot be adequately assessed.
3. The proposed 1-year term contracts with annual recompetitions creates instability, inefficiencies, and excessive administrative burden on agencies and contractors, which is counter to the stated intent of the draft rule. We recommend that the printing contracts allow for up to 4 separate annual option periods.
4. The proposed rule transfers the administrative burden currently assumed by the GPO to agencies to resolve disputes. Currently, the GPO works with commercial businesses and Federal agencies to resolve issues. Under the proposed rule, agencies with

011-1484

L. Duarte

relatively small printing requirements would lose the substantial leverage of the Government Printing Office in quickly resolving printing disputes with vendors.

- 5. Currently NRC rides other agencies' print orders administered by GPO when we wish to order copies of their documents. Also, other agencies and GPO ride NRC's print orders administered by GPO when they wish to order copies of our documents. This results in a lower cost by consolidating print orders. It is not clear how we can achieve similar economies under the new rules. Will there be a government-wide approach for riding other agencies' print orders?
- 6. The background on the proposed FAR change implementing the Office of Management and Budget (OMB) Memorandum No. M-02-07 does not refer to, nor address, the recent General Accounting Office (GAO) legal opinion B-300192 dated November 13, 2002. In B-300192, GAO has opined that notwithstanding the OMB Memorandum No-02-07, when obligated funds are used to acquire printing from sources other than the GPO, the GAO will report to Congress and the President when an agency's fund certifying and/or disbursing officer has violated the Antideficiency Act. It appears that the GAO does not agree with the OMB position and in its capacity may not release the certifying and disbursing officers from being held individually liable for the use of appropriated funds in acquiring printing from sources other than the GPO. What is the position of the FAR Council in response to the GAO legal opinion? In the event the GAO files an allegation of a violation of the Antideficiency Act, will the agency's fund certifying and disbursing officers be released from personal liability associated in their implementation of this proposed FAR provision?
- 7. The proposed FAR provision at 8.801(a)(3) relies on in-house printing subject to public-private competition and requires that the in-house costs be based on "a full account of all costs." It is unclear as to what is meant by the terms "a full account of all costs." Can the terms "a full account of all costs" be clarified as to what is intended and the nature of the costs that need to be captured for this purpose?

Sincerely,

William D. Travers
Executive Director
for Operations

1485



"Anne Grady"
<agrady@massbay.edu
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/18/2002 12:02 PM

December 18, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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OMB cites cost and small business opportunity as the main reasons for the change. However, GPO currently uses thousands of private contractors throughout the nation, acting as a clearinghouse for printing. I highly doubt that removing this organizational layer will cut costs, and they are already using small print shops for the majority of their work.

Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Anne Grady
6 Drury Ln
Natick, MA 01760
USA



"Benjamin Nehring"
<bennehring@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/18/2002 11:59 AM

December 18, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Benjamin Nehring
731 Williams Avenue
Port Edwards, WI 54469
USA

1486

1487



"Robert Honerkamp"
<robbie@shorty.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/18/2002 10:44 PM

December 18, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Robert Honerkamp
837 Twin Oaks Dr
Apt 1
Decatur, GA 30030
USA

1488



"Sebastien Cormier"
<space_dude_gaura@
hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/18/2002 09:56 PM

December 18, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Sebastien Cormier
5079 S.E. Marine Dr.
Burnaby, BC V5J 3G5
Canada

1489



"Bruce Hancock"
<bhancock@adelphia.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/18/2002 08:16 PM

December 18, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Bruce Hancock
RR3 Box 1769
Bridgton, ME 04009
USA

1490



Angellie.Jackson@do.tr
eas.gov
12/18/2002 11:05 AM

To: farcase.2002-011@gsa.gov
cc:
Subject: FW: Re: Comments on FAR Case 2002-011

Seasons Greetings, Linda.

I am forwarding these comments that were submitted by IRS. Although late, I hope they can be considered. I was on travel last week, and I am just returning to the office.

Comments on the proposed printing regulations

1. We question the need to establish separate rules in the FAR for procurement of printing. Current public policy regarding small business participation in Federal Procurement is acceptable for the procurement of other goods and services. For example, the synopsis and response time for printing over \$2,500 will be the same for other requirements over \$25,000. The administrative effort associated with the broader synopsis requirement for Procurement and the customer wait time may negate any possible savings from competition for requirements under \$25,000. In addition, limiting IDIQ contracts to one year, except Federal Supply Schedules. Recompensation of IDIQ contracts annually will create an administrative burden for the Procurement offices and customers. Why not limit the re-compete to two or three years so that the administrative savings associated with the use of such contracts may be achieved for everyone involved. Further, it is stated that all schedule vendors must be provided an opportunity to compete for orders over \$2,500, including orders against requirements type contracts. In addition, an exception should be allowed for only one responsible source justifications.

2. Item 2 indicates that agencies will be authorized to address printing needs via a private firm or GPO when GPO offers the best value. Should agencies be submitting an offer to GPO to submit a proposal on all printing requirements as part of the competitive process? If not, how would we know whether GPO offered the best value?

More guidance is needed to assist agencies in making the decision to include or exclude GPO in the competitive process.

3. We encourage and support the establishment of multiple award schedules to help facilitate the acquisition of printing services.

4. Some distinction may be needed to assist agencies in determining what documents should be sent to the Superintendent of Documents who will get them to the depository library. Not all documents that will be printed by agencies will be releasable to the general public.

5. Is there an easier way to find out how many copies of a publication GPO will need without having every Procurement office contact GPO for this information?

6. In addition to the Purchase by GPO Clause, it is suggested that a standard clause be developed that requires the contractor to provide an electronic copy, if available, or hard copy of publications printed or duplicated under each contract to GPO, except when the Federal agency has determined that the document is exempt from public access such as documents internal to the agency.



"Paul Traue, Jr."
<ptraeujr@1scom.net>
12/18/2002 10:18 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1491

December 18, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Paul Traue, Jr.
7928 Crouse Drive
Fort Worth, TX 76137
USA



"Derek young"
<derekyoung@bellsouth.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/18/2002 03:21 PM

1492

December 18, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Derek young
926 5th Ave N
Jacksonville Beach, FL 32250
USA



"Michael Giese"
<mgiese@pcbackup.cc
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/18/2002 02:37 PM

1493

December 18, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Michael Giese
42 Crown Ct
Powder Springs, GA 30127
USA



"Bryan Armbruster"
<b.m.armbruster@att.n
et>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/18/2002 02:02 PM

1494

December 18, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Bryan Armbruster
11754 Ivy Ridge Drive
North Royalton, OH 44133
USA



"Patsy Zarilla"
<z66@yahoo.com>
12/18/2002 12:59 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 18, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Patsy Zarilla
638 Mount Jackson Rd
New Castle, PA 16102
USA

1495



"Chris Parker"
<cparker@segv.org>
12/18/2002 12:29 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 18, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Chris Parker
2251 Dawson Ln
Algonquin, IL 60102
USA

1496



"Kris Kedzierski"
<kris@dwsfirm.com>
12/19/2002 12:39 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1497

December 19, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Kris Kedzierski
3236 N Natoma Ave
Chicago, IL 60634
USA



"Nathan Labadie"
<ab0781@wayne.edu>
12/19/2002 10:01 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1498

December 19, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Nathan Labadie
25224 Dallas Dr
Grosse Ile, MI 48138
USA



"Brendan Fitzpatrick"
<eff@sorklin.com>
12/19/2002 09:43 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1499

December 19, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Brendan Fitzpatrick
237 5th Ave
Apt 2R
Brooklyn, NY 11211
USA



"Darren Johnson"
<djohnson@us.britann
ica.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/19/2002 09:22 AM

1500

December 19, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Darren Johnson
239 S Kenilworth Ave
Elmhurst, IL 60126
USA



"Gail Hunn"
<gehunn@ceinetworks.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/19/2002 08:51 AM

1501

December 19, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gail Hunn
282 Treichler Road
Alburtis, PA 18011
USA



"Alex Ford"
<aford013@comcast.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/19/2002 01:57 PM

December 19, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Alex Ford
416 B South Hutchinson Street
Philadelp[hia, PA 19147
USA

1502



"Lynette Bellini"
<lynette@ics.uci.edu>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/19/2002 08:24 PM

December 19, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Lynette Bellini
3908 N Lincoln St
Westmont, IL 60559
USA

1503



"Ivan Greene"
<igreene@siu.edu>
12/19/2002 07:08 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1504

December 19, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Ivan Greene
803 N. Allyn St.
Carbondale, IL 62901
USA



"Greg Jalbert"
<greg@imaja.com>
12/19/2002 03:04 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1505

December 19, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Greg Jalbert
2409 Parker St. #2
Berkeley, CA 94704
USA



"Gabriel Gonzalez"
<g@ocf.berkeley.edu>
12/19/2002 02:25 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1.506

December 19, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gabriel Gonzalez
4016 Altamont Ave
Oakland, CA 94605
USA



"Celest Eden"
<c_mcg50@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/20/2002 05:41 AM

1507

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Celest Eden
6580 Delmonico Dr. #203-2
Colorado Springs, CO 80919
USA



"Brandon Carson"
<brandon_carson@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/20/2002 12:24 AM

1508

December 19, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Brandon Carson
434 Emerald Ave
San Carlos, CA 94070
USA



"David Cole"
<djcole2@attbi.com>
12/20/2002 12:05 AM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1509

December 19, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Cole
1511 Trimmingham Drive
Pleasanton, CA 94566
USA

1510

FEDERAL SUPPLY SERVICE
COMMENTS ON DRAFT PROPOSED RULE
FAR CASE 2002-011
PROCUREMENT OF PRINTING AND DUPLICATING THROUGH THE
GOVERNMENT PRINTING OFFICE

The Federal Supply Service has reviewed the proposed FAR Case 2002-011, Procurement of Printing and Duplicating through the Government Printing Office (GPO) and the following comments are provided for your consideration.

Introduction

The proposed rule eliminates restrictions that mandate use of GPO as the single source for procuring printing and duplicating services and frees agencies to select printing from a wide array of sources that can demonstrate their ability to meet the Government's needs most effectively. The Federal Supply Service Schedule Program has been identified in the proposed rule as an alternative means of procuring printing services. In identifying the FSS program as a potential source of supply for printing services, the proposed rule establishes a unique contractual framework and ordering process.

Proposed FAR 8.801(b)(2)(ii) would require that all printing schedule contractors be given notice using "e-Buy" and an opportunity to compete for any order over \$2,500. In addition all such e-Buy notices would be required to be forwarded to the GPE (i.e. FedBizOpps) for publication for informational purposes only. In addition, proposed FAR 8.801(b)(ii)(B) limits the length of a BPA under the FSS program to one year.

Areas of Concern

The proposed rule makes fundamental changes to the Multiple Award Schedule business model by adding new procedural requirements. The FSS Program has developed a solid reputation for offering ordering agencies a streamlined acquisition process based on a competitive foundation for goods and services. While GSA recognizes the need for deviations from standard procedures for offering printing services commercially for the first time, it remains committed to ensuring customer agencies and vendors the ability to comply with current standard operating procedures for other goods and services so agencies can receive increased efficiencies.

The following represent our recommendations for change to the rule with supporting arguments:

1) Recommendation: Eliminate the requirement to forward e-Buy notices to GPE for publication.

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- The simple posting of the requirement in e-Buy provides notification to all Schedule contractors who are users of e-Buy. A current contractual requirement under the Schedules Program is for contractors to load an electronic pricelist to GSA's online shopping mall, GSA Advantage! Once this is complete, firms are automatically loaded to e-Buy where they may respond to all available Request for Quotes. In essence, every Schedule contractor who has complied with the terms of the contract is provided the opportunity to compete for orders over \$2500 through e-Buy.
- Notice via FedBizOpps, in addition to posting to e-Buy, will likely confuse non-Schedule firms because anecdotal data supports the fact that "informational" type FedBizOpps postings of Schedule buys sometimes result in quotes submitted by non-Schedule firms who, under current rules, cannot be considered for a Schedule purchase. These situations result in tremendous frustration and protests on the part of the non-Schedule firms because they have incurred the costs of putting the proposal together and have no chance of an award. These protests then result in increased costs to industry and ordering agencies in resolving the issues.
- Currently, no direct link exists between e-Buy and FedBizOpps. This results in an additional burden on customer agencies as they will have to post these notices separately until system changes could be implemented.

2) Recommendation – Require GSA to post a single notification on an electronic bulletin board for all orders exceeding \$2500.

- Current ordering procedures for orders exceeding \$2500, other than those imposed by Section 803, require that an ordering agency request quotes from three (or more, if the order exceeds the Maximum Order Threshold) Schedule contractors. The value in negotiating and awarding a vast number of contracts is **significantly** diminished if most orders require notice to all; Schedule purchases offer little in the way of a streamlined process under this scenario, unless GSA could be permitted to post a single notice on an electronic bulletin board and this could be considered notice to all.
- According to a GPO listing of booklets by printer's state, GPO had 16,192 orders during the year ending July 31, 2002 with an average value over \$9200. Over 60% of the dollars and approximately 18% of the orders come from the GPO Central Office in Washington DC. Of the dollars excluding the DC area, a total of 13,261 orders were placed with an average value over \$4300. Assuming half of the DC work remains with the GPO, and a third of the orders are under \$2500, approximately 10,000 orders would require posting to e-Buy and FedBizOpps (approximately 30 per business day). All businesses, but particularly small businesses, would have a difficult time monitoring and selecting the Request for Quotes to which it would be beneficial to respond.

1510

3) Recommendation – Allow BPAs with options, rather than limiting them to one year.

- A primary benefit of BPAs is the increased discount negotiated based on the potential scope of the recurring requirements offered through exercising of options. Limiting the term of BPAs will likely result in increased costs to the Government because firms will be less inclined to offer significant discounts.
- Allowing BPAs with options provides ordering agencies a streamlined process in a competitive environment, the current value proposition of creating BPAs under the FSS Program. Mandating a one-year limitation on BPAs diminishes the value of an important aspect of the Schedules Program.
- Eliminating the ability to exercise options under BPAs will increase the administrative burden and costs for customer agencies as they will be required to re-compete more often.

4) Recommendation – Modify 8.801(b)(1) by replacing “agencies shall make awards...” with “agencies shall solicit and make awards...”

- “Solicit and make awards” is more representative of the process. Referring to acquisition regulations generally, not just the FAR, encompasses the entire regulatory system including agency supplements.

5) Recommendation – Include a reference to the requirements of FAR Part 11 and Subpart 23.400.

- The proposed FAR revision does not discuss the requirement to buy 30 percent paper nor reference the part of the FAR addressing this requirement. This requirement remains in effect.

202-011-1511

December 6, 2002

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW, Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

The Printing Industries of America is pleased to provide the following comments on the proposed amendments to the Federal Acquisition Regulations (FAR) to implement the policy set forth in the Office of Management and Budget (OMB) memorandum No. M-02-07, Procurement of Printing and Duplicating through the Government Printing Office (GPO) (May 3, 2002). The Printing Industries of America (PIA) is the nation's largest printing and graphic arts trade association with more than 13,000 members.

Before commenting on the specifics in the proposal, PIA wishes to address the legal concerns surrounding this proposal. Current law (Title 44, U. S. Code) and actions taken by Congress in the Continuing Resolution passed in December 2002 would suggest that the OMB proposal, if adopted, would place the private industry contractor in the situation of submitting bids in good faith, accepting awards in good faith, and yet, risking non-payment for contracted work. This potential was identified in a letter by the General Accounting Office indicating that payment of contracts in violation of the continuing resolution would be illegal.

Executive Branch employees likewise are hampered by this legal dilemma. Failure to follow the requirements of Title 44 may subject them to citations from the General Accounting Office and seriously impair their ability to work with members of their appropriations and authorizing committees in Congress.

We believe it is imperative that this conflict be addressed to resolve any uncertainty in the printing contracting community prior to the finalization of regulations. It would be inappropriate to place private companies in this uncertain role.

While we recognize that these legal issues must be resolved, it has been the position of the Printing Industries of America that it cannot aid in such a resolution in these comments. We have, therefore, confined the remainder of our comments to issues that affect the integrity and efficiency of the federal print procurement system.

2002-011-1511

Also, we have included some overview comments about the federal printing and print procurement program. We have made these suggestions for many years in an effort to assist the government with more efficient buying of information products.

1. The federal government does not have an information planning process nor does it have a printing and publishing plan. This failure to plan has created waste and abuse in the system. For example, federal agencies should be required as part of the budget planning process to submit a printing, information and publishing plan. This plan could be reviewed by the Chief Information Officer of each agency to determine the validity of the plan and whether the plan meets the agency's mission. With the approved plan, the agency could coordinate such plans with the Government Printing Office, develop requests for proposals from private companies, or consider alternative information options. We strongly recommend the implementation of an information planning process.
2. The Executive Branch should conduct an audit of its printing, copying, digital printing and duplicating capacity and commitments to assure that the taxpayer is being served. Printing is the nation's most competitive manufacturing industry. Printing is the largest industry in the United States in terms of numbers of establishments. This means that the federal government can always be assured of a competitive marketplace for printing. For the federal government to purchase equipment is to provide competitive services offered by private industry in every community in America and often invest in technology that can never be fully utilized.
3. In the "Supplementary Information" A. Background, 1. Overview Second bullet, the OMB states, "Providing agencies express authorization to address printing needs by either contracting with a private source or by using the GPO when the GPO offers the best value." This supplementary information and the specifics outlined in 8.801 Policy, subsection (c) are confusing. The implication in this proposal is that a federal agency, after January 1, 2004 would not be able to use the GPO unless such service was part of a competition. The majority of the printing work, which is processed by GPO, is contracted to the private sector. This section would require the agency to ask GPO to seek bids from the private sector while also requiring the agency to seek bids. The section would only apply in those rare instances when the GPO had predetermined that it would produce the printing job in house at the GPO and not contract to the private sector. We believe it would be more beneficial to the government for the agency to ask GPO to either handle the procurement or not. Conducting competing or "dueling" procurements would be unfair to the private companies that must spend time and resources on bidding.

We recommend that agencies continue to be given the latitude and authority to use the Government Printing Office for printing and printing procurement needs based on the unique requirements of the agency. Our proposal was also reflected in the public comments that have been made by OMB officials that the GPO could continue to be used if the agency wished to use the procurement services of GPO.

2002-011-1811

4. In the section "Supplementary Information" A. Background, 1. Overview Third bullet, OMB states "substantially limiting the circumstances where agencies may rely on in-house or other Executive Branch printing operations." These comments are reflected in the proposed regulations under 8.801 Policy (a) (3). While we welcome this addition to the regulations, it is a reality that such a competition can always be conducted in a manner that will favor the in-house operation. We urge that OMB adopt a broader policy which states that in-house capacity should be limited to self service copying and duplicating unless issues of national security indicate a need for additional facilities.

Also related to this section is the need for a clear definition of printing. Printing in this sense should include printing, copying, duplicating, and digital printing. There is a regrettable history in the federal government of using limited definitions of printing to allow agencies to avoid the spirit of regulations.

5. In the section "Supplementary Information" A. Background, 1. Overview Fourth bullet, OMB proposes to lower the small purchase threshold to \$2500 to reflect the typical size of printing contracts. We support this change; however, 80 percent of GPO contracts are under \$2500. While we do not propose the creation of a competitive bid program for these very small contracts, we would ask that OMB encourage agencies to implement procurement efficiency plans to buy such jobs from simplified purchase agreements, blanket purchase agreements, multiple award schedules or by combining contracts to reduce procurement costs. We would distinguish this type of procurement from "bundling" in that these contracts would typically be awarded to small, regional printing companies due to the dollar value of the job and the need for quick turn-around.

Also related to this section is a need to address the time required for procurement opportunities to be posted. FAR and FedBizOps provides for a twelve day posting requirement. Printing purchasers in the federal government are accustomed to turn-around times of less than 72 hours. We believe these shorter "posting" requirements times should be included in the new regulations.

6. In the section "Supplementary Information" A. Background, 1. Overview Fifth bullet, OMB addresses the need for "best value" contracts. This is a desirable change for both agencies and printers seeking to do business with the federal government. We believe this change, particularly if combined with the planning process we proposed, will enable the federal government to take advantage of abilities in the modern U. S. printing industry which are currently not being fully utilized. Best value contracts should include opportunities for printers to discuss with agency customers the most effective methods of completing printing jobs and delivering those jobs to the desired audience. Modern printing companies are skilled in pre-press or pre-flighting of work, printing and distribution/fulfillment. Use of modern technologies can significantly reduce agency burden, reduce procurement costs and improve timeliness and quality.

2002-011-1511

In conclusion we want to acknowledge the work done by the staff of OMB to develop these proposals. There is a need for general reform and better coordination in the production, procurement and distribution of federal government information. We are hopeful that this proposal will advance that process.

Sincerely,

Benjamin Y. Cooper
Executive Vice President



U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, DC 20416

1512

OFFICE OF THE CHIEF COUNSEL FOR ADVOCACY

December 13, 2002

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

RE: FAR Case 2002-011, Federal Acquisition Regulation; Procurement of Printing and Duplicating through the Government Printing Office (67 Fed. Reg. 68914, November 13, 2002).

Dear Ms. Duarte:

The Office of Advocacy of the U.S. Small Business Administration was created in 1976 to represent the views and interests of small business in Federal policymaking activities.¹ The Office of Advocacy monitors agencies' compliance with the Regulatory Flexibility Act (RFA)² and works with Federal agencies to ensure that their rulemakings are supported by analyses of small business impact. On August 13, 2002, President Bush underscored the importance of agency compliance with the RFA and the Office of Advocacy's role in giving a voice to small businesses in the rulemaking process when he signed Executive Order 13272, titled "Proper Consideration of Small Entities in Agency Rulemaking." Because the Office of Advocacy is an independent entity within the U.S. Small Business Administration (SBA), these views expressed by the Office of Advocacy do not necessarily reflect the views of the SBA or the Administration.

The Office of Advocacy is writing regarding FAR case 2002-011, Federal Acquisition Regulation; Procurement of Printing and Duplicating through the Government Printing Office. We commend the FAR Council for soliciting comments from small entities on this rule's impact. However, we note your failure to adequately justify a finding of no significant impact under the RFA.

This proposed regulation was published in the *Federal Register* on November 13, 2002. The proposed rule is designed to implement the policy set forth in Office of Management and Budget (OMB) Memorandum Number M-02-07, Procurement of Printing and Duplicating Through the Government Printing Office (GPO) (May 3, 2002). In order to induce competition, save taxpayer money and promote small business opportunities, the memorandum eliminates restrictions that mandated use of GPO as the single source and frees agencies to select printing from a wide array of sources that can demonstrate their

¹ Pub. L. No. 94-305 (codified as amended at 15 U.S.C. §§634a-g, 637).

² Pub. L. No. 96-354, 94 Stat. 1164 (1980) (codified as amended at 5 U.S.C. §§601-612).

12/13/02

1512

ability to meet the Government's needs most effectively. Advocacy's comments are limited to the application of the RFA to the proposed rule.

RFA Certification Requires a Factual Basis

In the proposed rule, the Federal Acquisition Regulation (FAR) Council certifies that the proposed rule will not have a significant economic impact on a substantial number of small entities within the meaning of the Regulatory Flexibility Act. While the FAR Council may be correct in its certification of no impact, the certification lacks a statement providing the factual basis for such determination as required by Section 605 (b) of the RFA.³

Availability of Data for Factual Basis Determination

Prior to certifying a rule under Section 605 (b) of the RFA, Advocacy recommends that an agency perform a preliminary analysis of the proposed rule's impact on small entities. The results of this analysis will likely provide the factual basis for the certification. In this case, the FAR Council may want to review information regarding contract awards made by the GPO to small businesses versus large businesses in the printing industry and determine how the proposed rule may affect small business participation in government printing. In addition, the FAR Council may want to explore how this proposal will impact small printers that do not receive contract awards from the GPO.

Steps to Cure Inadequate Certification

Without a statement explaining the factual basis, it is nearly impossible for small entities to evaluate the economic impact of the proposed rule. Thus, the Office of Advocacy recommends the following actions to cure this inadequate certification: **First**, if the FAR Council has factual data supporting its certification, then it should be published as supplemental note in the *Federal Register* with a period for public comment.. **Second**, the Office of Advocacy encourages the FAR Council to review carefully the comments submitted regarding the impact of its proposed rule on small entities. Based on the comments, the FAR Council should take appropriate steps to bring this rulemaking into compliance with the RFA by either publishing the factual basis for the certification or by publishing an IRFA for public comment.

³ 5 U.S.C. §§605(b).

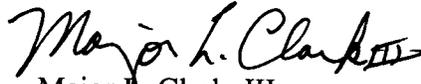
1512

Thank you for the opportunity to comment on this important proposal. If you have any questions regarding this letter, please feel free to contact the Office of Advocacy at (202) 205-6533.

Sincerely,



Thomas M. Sullivan
Chief Counsel for Advocacy



Major L. Clark, III
Assistant Chief Counsel

Cc: Dr. John Graham, Administrator, Office of Information and Regulatory Affairs

1513



"E. M. Camden"
<emckittyalley@hotmail.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/20/2002 06:39 PM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

As you may know, GPO manages the majority of government printing. In addition, it is responsible for indexing and disseminating this material to over 1,300 Federal depository libraries throughout the nation. GPO also puts much of this material on the Internet. According to GPO estimates, many agencies fail to deliver electronic copies of their documents, and I am concerned that decentralizing the printing process will further complicate the task of orderly and reliable electronic dissemination.

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

E. M. Camden
719 Paddock
Crawford, NE 69339
USA



"Curt Meinhold"
<curt@nymphoplease.
com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

1514

12/20/2002 05:51 PM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Curt Meinhold
31 Mallard Way
Waltham, MA 02452
USA

1515



"Orin Blomberg"
<orin_blomberg@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/20/2002 04:24 PM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Orin Blomberg
27 Gold Kettle Ct
Gaithersburg, MD 20878
USA

1516



"Michael Schumann"
<michael@schumann.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/20/2002 04:22 PM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Michael Schumann
764 Humboldt Rd
Brisbane, CA 94005
USA

1517



"Brian Gallagher"
<brian@virtcert.com>
12/20/2002 04:18 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Brian Gallagher
1326 Arabis Ct
Belcamp, MD 21017
USA

1518



"Gerald Hilts"
<gwhilts@technologist
.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/20/2002 03:52 PM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Gerald Hilts
125 NW 20th PL
apt 402
Portland, OR 97209
USA



"Eugene Piersol"
<epiersol@mindspring
.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/20/2002 02:21 PM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Eugene Piersol
205 Lakeview Rd
Tuskegee, AL 36083
USA

1519

1520



"joel rothermel"
<jrothermel@operamai
l.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/20/2002 02:02 PM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

joel rothermel
1111 Cascade Ave
Dallas, TX 75224
USA

1521



"Jeff Knisely"
<jeff@digitalgear.com>
12/20/2002 02:01 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jeff Knisely
2024 5th Ave
Sacramento, CA 95818
USA

1522



"Isaac Venn"
<eff.org@venns.org>

12/20/2002 01:50 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Isaac Venn
1504 Oxford Ln
Racine, WI 53406
USA



"Warren Volz"
<wrv@po.cwru.edu>
12/20/2002 01:17 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1523

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Warren Volz
1406 Preston Ave.
Austin, TX 78703
USA

1524



"Brandon A"
<reivec@the-kgb.org>
12/20/2002 01:03 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Brandon A
2324 Georgetown Rd NW Apt 207
Cleveland, TN 37311
USA

1525



"Ann Malain"
<malain@vaxa.cis.uwo
sh.edu>

To:
cc: (bcc: FARCASE 2002-011)
Subject: FAR case 2002-011

12/20/2002 11:54 AM

Attn: Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street, N.W., Room 4035
Washington, D.C. 20405

RE: FAR case 2002-011

I write to provide comments on FAR Case 2002-011, amendments proposed by the Office of Management and Budget to 48 CFR Parts 6, 8, and 52, "Federal Acquisition Regulation; Procurement of Printing and Duplicating Through the Government Printing Office" (GPO). I strongly urge that these amendments not be adopted, because they would significantly limit public access to federal government information by drastically reducing the number of federal documents distributed to the public through the Federal Depository Library Program (FDLP) and GPO's Sales Program.

I strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted, for the following reasons:

First, the proposed amendments clearly violate current law that is designed to ensure permanent and reliable public access to federal government information. Although OMB cites legal opinions by the Department of Justice to support the abrogation of 44 U.S.C. Section 501, the proposed amendments also violate other federal statutes, whose constitutionality the Department of Justice has never questioned, statutes that guarantee public access to federal government information. OMB's proposed amendments violate the federal statute that requires agencies procuring outside of GPO to bear the costs of printing and binding the necessary copies for depository libraries (44 U.S.C. Section 1903). In addition, the proposed regulation violates the statute that requires agencies to supply a copy of all publications to the Superintendent of Documents for cataloging purposes (44 U.S.C. Section 1710), because the vague proposed wording ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents.

Second, OMB's proposed amendments would exacerbate the problem of "fugitive documents." As noted above, the proposed regulation absolves the agencies from paying for and providing to GPO the legally-required number of copies of each publication for distribution to Federal Depository Libraries. Also as previously noted, agencies could easily avoid the requirement to provide one electronic copy of each publication, because the vague wording of the proposed amendments ("each agency shall ensure a copy of the publication is provided...") does not explicitly give the contracting agencies the direct responsibility for providing copies to the Superintendent of Documents. Further, the proposed language allows agencies to provide GPO with publications in unusable or inappropriate formats. The proposed language requires only that each publication be transmitted to the Superintendent of Documents "using electronic means." Agencies could comply with this language by providing copies of documents in electronic formats that are unusable or impractically labor-intensive to use (for example, corrupted files, raw data files, ASCII text files, or files in formats for which GPO does not have the appropriate software).

1525

The proposed language would likewise permit agencies to provide copies of documents that have structures that are impractically labor-intensive to use (for example, a 2,000 page report issued as 300 separate PDF files). Moreover, the proposed language fails to require agencies to provide GPO with tangible copies of publications for which electronic dissemination is inappropriate, such as very large format publications (for example, atlases) or publications containing illustrations that require complex color reproduction (for example, maps, scientific reports containing detailed photographs or diagrams, and posters). The failure of the proposed amendments to require provision of publications in usable and appropriate formats jeopardizes not only the current distribution of documents, but also the long-term preservation of documents for future use. Finally, the proposed amendments lack specific reporting, oversight, or enforcement measures to ensure agency compliance with legal requirements to provide copies of publications to GPO for the FDLP. Because of these flaws the proposed amendments would result in more fugitive federal publications, not fewer. The proposed regulation would allow agencies, freed from oversight by OMB or Congress, to avoid providing publications for the FDLP.

Third, the proposed amendments would seriously weaken GPO's Sales Program, upon which millions of Americans depend, particularly for access to legal information. Under the present system the Superintendent of Documents can augment agency procurement orders to obtain publications for the FDLP and the Sales Program at low cost. Law libraries especially depend on the Sales Program to purchase print federal primary legal materials that may be provided to depository libraries only in an unofficial, electronic version. The proposed rules do not adequately provide for a continued, cost-effective Sales Program.

Federal law gives GPO primary responsibility for providing public access to federal government information through the FDLP and the Sales Program. Federal law ensures that federal government information printed through GPO is indexed, distributed free of charge to the public in usable and appropriate formats, and preserved for future use. Information professionals say that this system provides "permanent public access" to federal government information. Today, the Superintendent of Documents provides reliable, efficient, cost-effective, and accountable permanent public access to federal government information through the FDLP and the Sales Program. OMB's proposed regulation would severely damage the current, effective system, and significantly reduce Americans' access to federal government information. I therefore strongly urge that OMB's proposed amendments to 48 CFR Parts 6, 8, and 52 not be adopted.

As a concerned citizen and tax payer, who supports government providing services such as this, I thank you very much for your consideration.

Ann Malain, Ph.D.
404 Congress St.
Neenah, WI 54956

1526



"Michael Duh"
<katowolf@hotmail.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/20/2002 11:04 AM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Michael Duh
233 Gravel Ridge Rd.
Waynesboro, VA 22980
USA

1527



"Gerald Shane"
<bear32@hotmail.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/20/2002 10:36 AM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Gerald Shane
617 Bounds Circle
Westover, WV 26501
USA



"Derrell Piper"
<ddp@electric-loft.org
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/20/2002 09:53 AM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Derrell Piper
41 6th Ave.
Santa Cruz, CA 95062
USA

1529



"Edward Schwarz"
<edmcman@despamm
ed.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/20/2002 07:25 PM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Edward Schwarz
1945 Split Rock Rd.
Lancaster, PA 17601
USA



"Darryl Levingston"
<jrrich20@hotmail.com>
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1530

12/20/2002 09:13 PM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Darryl Levingston
9103 Dorella Ln
Austin, TX 78736
USA

1531



"Davis Kuykendall"
<dkuykendall@carolina.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
CC:
Subject: I Oppose FAR Case 2002-011

12/20/2002 10:14 PM

December 20, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Davis Kuykendall
619 Stratford Woods Road
Matthews, NC 28105
USA

1532



"James Littlebrant"
<James_littlebrant@sp
eedymail.org>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/21/2002 10:28 AM

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

James Littlebrant
519 South Mueller Street
Appleton, WI 54914
USA

1533



"Eric Wolff"
<ewolff5998@aol.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/21/2002 12:15 PM

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Eric Wolff
138 Spencer Avenue
Guilford, CT 06437
USA

1534



"Richard Hutchison"
<mediocrates@visi.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/27/2002 07:58 AM

December 27, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

Richard Hutchison
1939 Fremont Av.
Saint Paul, MN 55119
USA

1535



"justin tack"
<j_spacesman3@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/21/2002 01:12 PM

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

justin tack
1605 Peppermill road
Lapeer, MI 48446
USA

1536



"Gerald Dalton"
<gdalton@worldnet.att.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/21/2002 01:30 PM

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Gerald Dalton
874 Benedetti Drive #202
Naperville, IL 60563
USA

OB 3"



"David Pritchett"
<Dpartra09@aol.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1537

12/23/2002 02:15 AM

December 22, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

David Pritchett
1610 Wood Duck Dr
Winter Springs, FL 32708
USA

1538



"Joshua Peper"
<josh_420@swirve.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/21/2002 03:59 PM

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Joshua Peper
1504 Treefarm Rd
Iuka, IL 62849
USA

1539



"Douglas Thrift"
<DouglasWTh@myreal
box.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/21/2002 04:50 PM

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Douglas Thrift
11961 Mustang Ct
Ojai, CA 93023
USA

1540



"Charles R. Norris IV"
<rob@coronawithalime.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/21/2002 06:25 PM

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Charles R. Norris IV
17071 Quail Creek Cir
Hamilton, VA 20158
USA

1541



"Paul Pratzner"
<pavel@bozleyco.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011
>

12/21/2002 07:47 PM

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Paul Pratzner
532 Greenhill Ave
Wilmington, DE 19805
USA



"Michael Thompson"
<psionix@waytrunk.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/21/2002 08:29 PM

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Thompson
2916 Harwood Rd
Apt G106
Bedford, TX 76021
USA

1542

1543



"Scott Smith"
<ahnvil@hotmail.com>
12/21/2002 09:59 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Scott Smith
966 South Hoover Street
apartment 306
Los Angeles, CA 90006
USA



"James Hager"
<jameshager2003@yahoo.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/21/2002 10:11 PM

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

James Hager
232 Perch Dr
Fayetteville, NC 28306
USA

1544



"Edward Brouillet"
<vigilyn@pcnet.net>
12/21/2002 10:45 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1545

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Edward Brouillet
502 Trout Brook Dr
West Hartford, CT 06110
USA



"Nolen Scaife"
<nolen@scaife.org>
12/21/2002 10:49 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1546

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Nolen Scaife
216 White Blossom Cir
Bryant, AR 72022
USA



"Michael Brewer"
<mbrewer@carolina.rr.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/21/2002 11:47 PM

1547

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Michael Brewer
5301 Bentgrass Run Dr
Charlotte, NC 28269
USA

1548



"Daniel Whaley"
<dwhaley@lagoon.org
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/22/2002 12:37 AM

December 21, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Finally, I urge you to respect Congress' fifth and most recent resolution, HJ Res 122, which condemns this measure. Similar attempts were made in 1987 and 1994, and they have always been thwarted. Please do not break from over 140 years of tradition. Thank you for your time.

Sincerely,

Daniel Whaley
1775 Lake St
San Mateo, CA 94403
USA



"John Hickey"
<jhickey1@csi.com>
12/22/2002 04:12 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1 549

December 22, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

I am writing in regard to FAR Case 2002-011, regarding the Office of Management and Budget's (OMB) proposal on the Government Printing Office (GPO). Specifically, I urge you to reject the OMB proposal and keep the GPO at the center of the Federal printing process.

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Sincerely,

John Hickey
2509 Stonebridge Rd
Dothan, AL 36301
USA



"Steven Short"
<Sands80@yahoo.com
>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/22/2002 04:57 PM

1550

December 22, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Steven Short
6404 SW 30th Ave
#46
Portland, OR 97239
USA

1551



"Harley Fisher"
<mrwizard_7@excite.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/22/2002 07:38 PM

December 22, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Harley Fisher
1409 39th St
Orlando, FL 32839
USA



"Thomas Vincent"
<tom@tvincent.com>
12/22/2002 09:20 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

1552

December 22, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Thomas Vincent
2817 Myrtle Ave
Schenectady, NY 12306
USA

1553



"Russell Tammany"
<russell@xponentia.com>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/22/2002 09:55 PM

December 22, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Russell Tammany
4239 Brookshire Circle
Santa Rosa, CA 95405
USA



"Steven Nick"
<atrus1013@techie.co
m>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/23/2002 02:15 AM

December 22, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Steven Nick
21454 Park Bishop Dr.
Katy, TX 77450
USA

1554

1555



"Brian Feller"
<bafeller@nc.rr.com>
12/22/2002 11:46 PM

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

December 22, 2002

FAR Case 2002-011
Federal Acquisition Regulation

Dear FAR Board ,

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Sincerely,

Brian Feller
5604 Kimsey Ct
Raleigh, NC 27606
USA

1556



"Jean Gongaware"
<fljean@comcast.net>

To: "FAR Board" <farcase.2002-011@gsa.gov>
cc:
Subject: I Oppose FAR Case 2002-011

12/23/2002 02:09 AM

December 22, 2002

FAR Case 2002-011
Federal Acquisition Regulation

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Sincerely,

Jean Gongaware
4259 Shady Oaks Ct
Sarasota, FL 34233
USA

| <u>Response Number</u> | <u>Date Received</u> | <u>Comment Date</u> | <u>Commenter</u> |
|------------------------|----------------------|---------------------|---------------------------------|
| 2002-011-1553 | 12/22/02 | 12/22/02 | Tammany Russell |
| 2002-011-1554 | 12/23/02 | 12/23/02 | Steven Nick |
| 2002-011-1555 | 12/22/02 | 12/22/02 | Brian Feller |
| 2002-011-1556 | 12/23/02 | 12/23/02 | Jean Gongaware |
| 2002-011-1557 | 12/26/02 | 12/02/02 | Epimethian Press & Distribution |
| 2002-011-1558 | 12/26/02 | 12/02/02 | Skokie Public Library |

Attachments

E P I M E T H I A N
PRESS & DISTRIBUTION

2002-011-1557

December 2, 2002

General Services Administration
FAR Secretariat (MVA)
Attn: Laurie Duarte
1800 F St., NW, Room 4035
Washington, DC 20405

Re: FAR Case 2002-011 / RIN 9000-AJ51

Dear Ms. Duarte:

I am writing in response to the proposed rule published in the *Federal Register* on November 13, 2002 concerning the procurement of printing and duplicating by executive branch agencies. We respectfully submit these comments and ask that they be considered by the General Services Administration (GSA) in the rulemaking process.

Epimethian Press is a tax exempt organization organized to perform criminal justice policy analysis and provide information to the general public concerning the nation's prison systems. In this line of work we rely heavily on government documents, and (by extension) the Federal Depository Library Program (FDLP).

The argument for removing the Federal Acquisition Regulation provisions concerning mandatory agency use of the Government Printing Office (GPO) are not, in our view, persuasive. The GPO provides a high level of technical expertise. If the proposed rules are implemented, it is entirely conceivable that executive branch agencies could be so burdened by having to evaluate competitive bids for printing, that any potential cost savings are cancelled by the increased labor of the procurement process. While the Department of Justice opinions concerning the illegality of congressional requirements that executive branch agencies use GPO are understandable, this does not preclude the executive branch from promulgating similar regulations to replace the congressional requirements.

This having been said, our primary concern with the proposed regulations is their effect on public access to information in general, and the FLDP in particular. The proposed rule apparently takes the opportunity of printing acquisition reform to enhance the FLDP. In our view, however, it does not go far enough. Since GPO is currently the sole provider of printing services for agencies, transfers of documents to the Superintendent of Documents can occur in-house. While the proposed rules claim to specify "mandatory steps" to ensure that documents are transmitted to the Superintendent for use in the FLDP, there are no enforcement mechanisms. Given the potential for miscommunications and implementation problems which would arise from the decentralization of printing under the proposed rules, new procedures must be developed to provide for auditing of printing contracts, to ensure that all contractors and agencies comply with FLDP deposit requirements. Contractors and agencies failing to comply should face penalties. In addition, the information distribution clause (67 FR 68916) would put the

P.O. Box 2143, Colorado Springs, CO 80901

(719) 475-8059 phone • (719) 475-0530 fax • info@epimethian.org

Epimethian Press & Distribution is a 501(c)(3) nonprofit organization and a member agency of Community Shares of Colorado

2002-011-1557

Ms. Laurie Duarte
General Services Administration
November 29, 2002
Page 2 of 2

financial burden of acquiring FLDP copies of documents on the shoulders of GPO. We would propose that the cost of a set number of FLDP copies (perhaps 435—enough for one depository in each congressional district) be absorbed by the agency.

We appreciate that the GSA has taken public access to information into account during the drafting of the proposed rules; however, we are not convinced that the new requirements would be adequate. As advocates for total public access to non-classified government information, we have seen inadequate implementation of information sharing policies all too frequently. Should the proposed rules be implemented (something we are opposed to), we urge the GSA to—at a minimum—take this opportunity to close any potential loopholes which could hinder distribution of government documents through the FLDP.

Thank you for the opportunity to provide input on this process.

Sincerely,



Stephen Rahe
Executive Director

| <u>Response
Number</u> | <u>Date
Received</u> | <u>Comment
Date</u> | <u>Commenter</u> |
|----------------------------|--------------------------|-------------------------|------------------------------------|
| 2002-011-1553 | 12/22/02 | 12/22/02 | Tammany Russell |
| 2002-011-1554 | 12/23/02 | 12/23/02 | Steven Nick |
| 2002-011-1555 | 12/22/02 | 12/22/02 | Brian Feller |
| 2002-011-1556 | 12/23/02 | 12/23/02 | Jean Gongaware |
| 2002-011-1557 | 12/26/02 | 12/02/02 | Epimethian Press &
Distribution |
| 2002-011-1558 | 12/26/02 | 12/02/02 | Skokie Public Library |

Attachments

2002-011-1558

Skokie Public Library

December 2, 2002

ATTN: Laurie Duarte
General Services Administration
FAR Secretariat (MVA)
1800 F Street, N.W., Room 4035
Washington, DC 20405



Carolyn A. Anthony
Director

Dear Ms. Duarte:

The following is a response to a request for comments on FAR case 2002-011
(*Federal Register*, Vol. 67, No. 219, November 13, 2002).

I am a reference librarian with over 30 years of experience in a public library which has consistently and heavily utilized the GPO Sales Program because of the demand from our public that federal government information be available locally. Our patrons have also benefited on many occasions from our proximity to the resources of the Federal Depository Libraries in the 9th Congressional District and surrounding Chicago Metropolitan Area.

In my opinion, instituting the regulatory changes proposed in this case will have long-term negative consequences for the integrity and survival of the Government Printing Office, the Federal Depository Library Program and for the process of making available to the public both paper and electronic Government publications. Specifically:

- Section 501 of Title 44 of the United States Code requires that printing be done by or through the Government Printing Office.
- The GPO's purpose is to identify, catalog, announce, and distribute Government information to the public. It plays a unique centralizing and coordinating role that is not tied to the missions, budgets, or agendas of individual executive-branch agencies but rather is an organization dedicated to serving the entire Government and the public.
- The GPO offers a centralized purchasing program with significant economies of scale and already heavily relies on the private sector, especially small businesses, for its printing requisitions.
- Studies by the GAO, Office of Technology Assessment, and the Joint Committee on Printing indicate that in-house printing by agencies may be 50% more expensive than comparable services through the GPO.

(continued)

5215 Oakton Street
Skokie, Illinois 60077
847.673.7774
847.673.7797 fax

Laurie Duarte
December 2, 2002
page 2

- Statute requires that agencies direct copies of their publications to the GPO for cataloging, entry into the Catalog of United States Government Publications, and inclusion in the Federal Depository Library Program. At present it is precisely in those instances where agencies by-pass the GPO in the printing process that their publications never enter this cycle and never reach the public either through availability at a Depository Library or through the GPO's Sales Program. The effect of the Proposed Rule will be to weaken rather than improve the Federal Depository Library System in this critical aspect.
- Distribution of electronic publications will be undermined in a similar fashion under the Proposed Rule since the GPO relies on this same centralized printing and distribution system created by Title 44 to identify new electronic products for inclusion on *GPO Access* and to work to create permanent public access to them.

The proposed FAR rule changes which by-pass the GPO in the printing process and promote a decentralized, piecemeal approach to the acquisition and distribution of Government information can only lead to a severe reduction in the public's access to Government information and I would urge that they not be approved.

Sincerely,



Jane Hagedorn
Reference Librarian

/jh

cc: Carolyn A. Anthony



March 20, 2003

MEMORANDUM FOR RONALD POUSSARD
DIRECTOR
DEFENSE ACQUISITION REGULATIONS COUNCIL

FROM: RODNEY P. LANTIER 
DIRECTOR
REGULATORY SECRETARIAT AND FEDERAL ASSISTANCE
PUBLICATIONS DIVISION

SUBJECT: FAR Case 2002-011, Procurement of Printing and Duplicating
Through the Government Printing Office

Attached are comments received on the subject FAR case published at 67 FR 68914;
November 13, 2002. The comment closing date is December 13, 2002.

| <u>Response
Number</u> | <u>Date
Received</u> | <u>Comment
Date</u> | <u>Commenter</u> |
|----------------------------|--------------------------|-------------------------|------------------|
| 2002-011-1559 | 03/10/03 | 03/10/03 | U.S. SBA |
| 2001-011-1560 | 03/04/03 | 03/04/03 | U.S. Senate |

Attachments



U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, D.C. 20416

2002-1559

MAR 10 2008

Ms. Laura Smith
Chairwoman, Civilian Agency Acquisition Council
18th and F Streets, NW
Washington, DC 20405

Dear Ms. Smith:

The purpose of this letter is to request a revision to the Federal Acquisition Regulation (FAR), in order to incorporate the January 2002 modifications of the North American Industry Classification System (NAICS).

The Small Business Competitiveness Demonstration Program was established in 1989 by Title VII of Public Law 100-656, as amended. Section 404 of Public Law 105-135, "Small Business Reauthorization Act of 1997," permanently extended the Program.

The Program had also been amended by Public Law 105-135 to incorporate a new industry classification system. In 1997, the NAICS replaced the Standard Industrial Classification System. Effective October 1, 2000, the designated industry groups subject to the Program are identified by industries defined by NAICS. An interim rule published on July 26, 2000, lists the NAICS industries for the four designated industry groups and was adopted by a final rule published on December 18, 2001.

Consequently, the table at FAR 19.1005 must be revised to reflect the NAICS industries for the construction designated industry group and the product service codes, where applicable.

Please advise me of the FAR case number as soon as possible. Should you have questions, please contact Dean Koppel of my staff at (202)205-7322. Your prompt attention to this matter is appreciated.

Sincerely,

Linda G. Williams
Associate Administrator
for Government Contracting

Enclosure

SBA IS AN EQUAL OPPORTUNITY EMPLOYER AND PROVIDER

2002-011-1559

RECOMMENDED REVISIONS (strike through and insertion are in bold)

Subpart 19.10- Small Business Competitiveness Demonstration Program

19.1005 Applicability.

FAR 19.1005 is amended by striking the following:

(a) Designated industry groups.

| NAICS CODE | NAICS DESCRIPTION |
|--|---|
| | Construction (except dredging) |
| Subsector 233 Building, Developing, and General Contracting | |
| 23311 | Land Subdivision and Land Development |
| 23321 | Single Family Housing Construction |
| 23322 | Multifamily Housing Construction |
| 23331 | Manufacturing and Industrial Building Construction |
| 23332 | Commercial and Institutional Building Construction |
| Subsector 234 Heavy Construction | |
| 23411 | Highway and Street Construction |
| 23412 | Bridge and Tunnel Construction |
| 23491 | Water, Sewer, and Pipeline Construction |
| 23492 | Power and Communication Transmission Line Construction |
| 23493 | Industrial Nonbuilding Structure Construction |
| 23499 | All Other Heavy Construction |
| Subsector 235 Special Trade Contractors | |
| 23511 | Plumbing, Heating, and Air-Conditioning Contractors |
| 23521 | Painting and Wall Covering Contractors |
| 23531 | Electrical Contractors |
| 23541 | Masonry and Stone Contractors |

2002-011-1559

| | |
|---|--|
| 23542 | Drywall, Plastering, Acoustical, and Insulation Contractors |
| 23543 | Tile, Marble, Terrazzo, and Mosaic Contractors |
| 23551 | Carpentry Contractors |
| 23552 | Floor Laying and Other Floor Contractors |
| 23561 | Roofing, Siding, and Sheet Metal Contractors |
| 23571 | Concrete Contractors |
| 23581 | Water Well Drilling Contractors |
| 23591 | Structural Steel Erection Contractors |
| 23592 | Glass and Glazing Contractors |
| 23593 | Excavation Contractors |
| 23594 | Wrecking and Demolition Contractors |
| 23595 | Building Equipment and Other Machinery Installation Contractors |
| 23599 | All Other Special Trade Contractors |
| Nonnuclear Ship Repair | |
| 336611 | Ship Building and Repairing |
| Architectural and Engineering Services
(including surveying and mapping) | |
| 54131 | Architectural Services |
| 54133 | Engineering Services |
| 54136 | Geophysical Surveying and Mapping Services |
| 54137 | Surveying and Mapping (except Geophysical) Services |
| Refuse Systems and Related Services | |
| 562111 | Solid Waste Collection |
| 562119 | Other Waste Collection |
| 562219 | Other Nonhazardous Waste Treatment and Disposal |

2002-01-1559

FAR 19.1005 is amended by substituting the following:

(a) *Designated industry groups.*

| 2002
NAICS
Code | 2002 NAICS Title |
|---|---|
| | Construction (except dredging) |
| Subsector 236-Construction of Buildings | |
| 236115 | New Single-Family Housing Construction (except Operative Builders) |
| 236116 | New Multifamily Housing Construction (except Operative Builders) |
| 236117 | New Housing Operative Builders |
| 236118 | Residential Remodelers |
| 236210 | Industrial Building Construction |
| 236220 | Commercial and Institutional Building Construction |
| Subsector 237-Heavy and Civil Engineering Construction | |
| 237110 | Water and Sewer Line and Related Structures Construction |
| 237120 | Oil and Gas Pipeline and Related Structures Construction |
| 237130 | Power and Communication Line and Related Structures Construction |
| 237210 | Land Subdivision |
| 237310 | Highway, Street, and Bridge Construction |
| 237990 | Other Heavy and Civil Engineering Construction (except dredging) |
| Subsector 238-Specialty Trade Contractors | |
| 238110 | Poured Concrete Foundation and Structure Contractors |
| 238120 | Structural Steel and Precast Concrete Contractors |
| 238130 | Framing Contractors |
| 238140 | Masonry Contractors |
| 238150 | Glass and Glazing Contractors |
| 238160 | Roofing Contractors |

2002-011-1559

| | |
|--|---|
| 238170 | Siding Contractors |
| 238190 | Other Foundation, Structure, and Building Exterior Contractors |
| 238210 | Electrical Contractors |
| 238220 | Plumbing, Heating, and Air-Conditioning Contractors |
| 238290 | Other Building Equipment Contractors |
| 238310 | Drywall and Insulation Contractors |
| 238320 | Painting and Wall Covering Contractors |
| 238330 | Flooring Contractors |
| 238340 | Tile and Terrazzo Contractors |
| 238350 | Finish Carpentry Contractors |
| 238390 | Other Building Finishing Contractors |
| 238910 | Site Preparation Contractors |
| 238990 | All Other Specialty Trade Contractors |
| Subsector 336-Nonnuclear Ship Repair | |
| 336611 | Ship Building and Repairing |
| PSC J998 | |
| PSC J999 | |
| Subsector 541-Architectural and Engineering Services (including surveying and mapping) | |
| 54131 | Architectural Services or |
| 54133 | Engineering Services |
| PSC C111 | |
| PSC C112 | |
| PSC C113 | |
| PSC C114 | |
| PSC C115 | |
| PSC C116 | |
| PSC C117 | |
| PSC C118 | |

2002-011-1559

| | |
|---|--|
| PSC C119 | |
| PSC C121 | |
| PSC C122 | |
| PSC C123 | |
| PSC C124 | |
| PSC C129 | |
| PSC C130 | |
| PSC C211 | |
| PSC C212 | |
| PSC C213 | |
| PSC C214 | |
| PSC C215 | |
| PSC C216 | |
| PSC C219 | |
| 54136 | Geophysical Surveying and Mapping Services or |
| 54137 | Surveying and Mapping (except Geophysical) Services |
| PSC T002 | |
| PSC T004 | |
| PSC T008 | |
| PSC T009 | |
| PSC T014 | |
| PSC R404 | |
| Subsector 562-Refuse Systems and Related Services | |
| 562111 | Solid Waste Collection or |
| 562119 | Other Waste Collection or |
| 562219 | Other Nonhazardous Waste Treatment and Disposal |
| PSC S205 | |

ERNEST F. HOLLINGS
SOUTH CAROLINA

2002-011-1560

OFFICES:

1835 ASSEMBLY STREET
COLUMBIA, SC 29201
803-765-5731

126 FEDERAL BUILDING
GREENVILLE, SC 29603
864-233-5366

112 CUSTOM HOUSE
200 EAST BAY STREET
CHARLESTON, SC 29401
843-727-4525

United States Senate

125 RUSSELL OFFICE BUILDING
WASHINGTON, DC 20510-4002
202-224-6121

EMAIL: <http://hollings.senate.gov>

March 4, 2003

COMMITTEES:

COMMERCE, SCIENCE, AND
TRANSPORTATION: RANKING
APPROPRIATIONS
COMMERCE, JUSTICE, STATE AND
THE JUDICIARY: RANKING
DEFENSE
LABOR, HEALTH AND HUMAN SERVICES,
EDUCATION
ENERGY AND WATER DEVELOPMENT
INTERIOR
BUDGET
DEMOCRATIC POLICY COMMITTEE

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

Dear Ms. Duarte:

Enclosed please find copies of the letters I received from Dr. Janis Bandelin, Rebekah Maxwell, and Steve Richardson concerning proposed changes in Federal Acquisition Regulation (FAR Case 2002-011).

I would appreciate your taking the comments into consideration. Thank you for your assistance.

With kindest regards, I am

Sincerely,



Ernest F. Hollings

EFH/gm
Enclosure



202-011-1560

Senator Fritz Hollings
Washington, DC

COLEMAN KARESH LAW LIBRARY

RE: FAR Case 2002-011

Dear Senator Hollings:

I am writing in protest of the memorandum from OMB's Mitchell E. Daniels, Jr., calling for amendments to the Federal Acquisition Regulation that will permit agencies to contract for printing outside of the GPO. There are a number of things wrong with this idea, not the least of which is the result that will be achieved when taxpayer monies are given to agencies for dissemination of government information through channels that will hinder taxpayer access or render it impossible. To ask taxpayers to fund a system that may eventually trick them out of information is unconscionable.

The amendments are in violation of several provisions of Title 44 of the United States Code, including Sections 501, 1903 and 1710. The proposed changes to FAR will disrupt the production process successfully performed by the GPO and will effectually gut the document control process that is currently being managed by the Federal Depository Library Program. The need for strengthened support of the GPO and the FDLP is as necessary for electronic documents as it is for traditional print documents. However, access to technology is still not 100% equal throughout our nation, and the public needs ongoing access to current government information in permanent print formats.

Daniels' proposed FAR amendments would exacerbate the "fugitive document" problem and, as they provide no continued cost-effective Sales Program, would make it harder for law libraries to purchase print Federal primary material. My library patrons depend on reliable, timely, comprehensive, and permanent access to government information. Government agencies have the legal responsibility to see that they get it.

Please support the right of the American public to equitable, efficient, reliable, no-fee access to government information in permanent and readily-accessible formats. Please oppose the Daniels amendments to the FAR.

Sincerely, *Rebekah Maxwell*
Rebekah Maxwell, J.D., M.L.I.S.
Reference Librarian
Coleman Karesh Law Library
University of South Carolina School of Law
701 Main Street
Columbia, SC 29208

2002-011-1560

December 6, 2002

Dr Ernest F. Hollings
Russell Senate Office Building
Washington, DC 20510

Dear Sir:

I am writing to you both as a concerned constituent and as a professional librarian who daily observes the benefits of an informed citizenry in regard to our government's activity. I wish to call your attention to a disturbing development suggested by the Office of Management and Budget recently.

The whole fabric of our constitutional freedoms is bound up in the citizens free access to government information. It is an essential principle of a democratic society and a valuable public good created at taxpayer expense that citizens have access to this information in permanent and readily accessible formats. This condition of democracy has been successfully maintained since the inception of the Federal Depository Library Program (FDLP).

In a move supposedly to curtail expense, the Office of Management and Budget is proposing amendments to the Federal Acquisition Regulation(FAR) that will allow agencies to procure their own printing outside of GPO. You may take a look at the proposed amendments as they were published in the Federal Register, Vol.67, No. 219, November 13, 2002, 68913-8.

What is abundantly clear about this proposition is that it is in clear violation of 44 U.S.C. §501 since they authorize agencies to procure their printing outside of GPO. In addition this proposal does not take into account the need for an effective enforcement mechanism, with Congressional oversight, to ensure that agencies meet their legal obligations to provide tangible and electronic publications to the Superintendent of Documents. This change will negatively impact the FDLP and the public's ability to locate, use, and have permanent access to agency publications in all formats.

It is becoming more critical with the plethora of electronic documents that a strong system of coordination, including an effective and transparent system to bring Government publications into the FDLP, is as necessary in the electronic environment as it is in the print world to ensure that agency publications in all formats are permanently accessible by the public. The FDLP is currently the most pervasive public arm battling the digital divide as well.

I urge you and your office to do all you can to prevent this inconsiderate and undemocratic act to take place.

Thank you,


Steve Richardson
Coordinator of Reference Services
James B. Duke Library
Furman University
Greenville SC 29613

335550

1142



FURMAN

2002-011-1560

2002 DEC 20 PM 4:03

DIRECTOR OF LIBRARIES

December 12, 2002

The Honorable Ernest F. Hollings
United States Senate
125 Russell Senate Office Building
Washington, DC 20510

Dear Senator Hollings:

As Director of Libraries at Furman University, I am very concerned about the possibility that proposed amendments to the Federal Acquisition Regulation (FAR Case 2002-011) allowing agencies to procure their own printing outside of the Government Printing Office will have a deleterious effect on the dissemination and access of government information to the public.

There are several matters proposed which will weaken the existing Federal Depository Library Program, a program which does a good job now of distributing and preserving government information. These include:

- Requiring the Superintendent of Documents to bear the cost of publications sent to depository libraries.
- Having a vague or nonexistent system for requiring agencies to submit the documents they print to the Superintendent of Documents for distribution to depository libraries.
- Including no enforcement mechanism to ensure agencies make their publications available to the public.

The Government Printing Office has been able to use agency procurement orders to obtain publications for the depository libraries in a seamless and cost-effective manner. In addition, the Superintendent of Documents and professional library staff have been taking on the challenge of making electronic publications from agency web sites accessible to the public and preserved for the future. GPO and FDLP are effective, non-bureaucratic workhorses of democracy. The proposed changes may seek to save money through printing costs (and this is debatable), but the disruption to the dissemination of information to the public would have costs and repercussions that cannot be estimated.

2002-011-1540

I ask that you and members of your staff examine these issues and take action to ensure that access to government information by our citizenry is not impeded.

Sincerely,

A handwritten signature in black ink, appearing to read "Janis M. Bandelin". The signature is fluid and cursive, with a large initial "J" and "B".

Janis M. Bandelin, Ph.D.
Director of Libraries



2002-011-1560

New York Library Association

252 Hudson Ave., Albany, NY 12210-1802
518-432-6952 / 800-252-NYLA / 518-427-1697 FAX
nylaoffice@pobox.com
www.nyla.org

February 18, 2003

Ms. Kathleen O'Halloran
Contracting Officer
Executive Office of the President
Office of Procurement
725 17th Street, NW Room 5002
Washington, D.C. 20503

Dear Ms. Halloran,

The New York Library Association is seriously concerned about the proposed outsourcing of the printing of government documents. Public access to these documents is legally required and necessary for the electorate's thorough understanding of the issues that affect our society.

Currently, the Federal Depository Library Program provides local access to Federal Government Information through approximately 1300 depository libraries. Located in almost every congressional district, these libraries provide citizens with direct access to Federal Government information. Copies that go to these depositories, as well as those disseminated through sales, international exchange and by-law programs, are paid for by the Superintendents of Documents Office. For every dollar that the government spends, local libraries spend an average of \$3.00 to support their local Federal Depository Library Program collections and to help the public use this material.

Since tangible publications such as print and microfiche produced by executive agencies outside of the GPO most often become fugitive documents (neither cataloged nor distributed to depository libraries) we are concerned that outsourcing the printing program will exacerbate the problem. As agencies schedule printing jobs, the GPO is positioned to capture the necessary information to order additional copies for the depositories at the local libraries, and to catalog them, making their existence and availability known to everyone. When agencies operate outside the GPO framework, the cost of the additional copies must be expended from agency appropriated funds. These additional burdens may aggravate the fugitive document problem. Public access to these documents, (which would have been transparent and free via the federal depository libraries) will be denied.

Although the government has embraced the Internet as a means to advance the dissemination of government information in an electronic environment, print and other tangible publications will continue to play a vital role in informing the public, particularly since some electronic government databases such as PubScience have been discontinued.

2002-011-1560

We urge you to support the Dayton amendment to the Senate Treasury and General Government Appropriations Bill for FY 2003. This amendment directs the administration to provide sufficient quantities for the dissemination of paper copies for depositories as well as international exchange, sales and by-law programs.

Sincerely,

New York Library Association

CC: George W. Bush, President of the United States
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Laura Bush
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Representative Robert Ney, Chairman
Joint Committee on Printing
346 Russell Senate Office Building
Washington, DC 20510

Senator Thad Cochran, Vice Chairman
Joint Committee on Printing
United States Senate
Washington, D.C. 20510

Senator Robert C. Byrd, Chairman
Senate Committee on Appropriations
Committee on Appropriations
U.S. Senate
S-128, the Capitol
Washington, D.C. 20510

Senator Ted Stevens, Ranking Member
Senate Committee on Appropriations
Senate Committee on Appropriations
Committee on Appropriations
U.S. Senate
S-128, the Capitol
Washington, D.C. 20510

2002-011-1560

Representative C.W. Bill Young, Chairman
House Committee on Appropriations
Senate Committee on Appropriations
Committee on Appropriations
U.S. Senate
S-128, the Capitol
Washington, D.C. 20510

Mitchell E. Daniels, Jr. Director
Office of Management and Budget
725 17th Street, N.W.
Washington, DC 20503

Bruce R. James
Public Printer
Government Printing Office
Washington, D.C. 20402

General Services Administration
FAR Secretariat (MVA)
1800 F Street, NW Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

Senator Charles Schumer
757 Third Ave
Suite 17-02
New York, NY 10017

Senator Hillary Rodham Clinton
780 Third Ave
Suite 2601
New York, NY 10017

American Library Association
Office for Intellectual Freedom
50 E. Huron Street
Chicago, Ill 60611

Rod Paige
Secretary of Education
U.S. Department of Education
Washington, D.C. 20202