

SUPPORTING STATEMENT

A. JUSTIFICATION

1. This is a request for an extension of the expiration date of the information collection requirement currently approved under OMB Control Number 0704-0398, now entitled "Defense Federal Acquisition Regulation Supplement (DFARS) Sections 211.272 and 211.273, Substitutions for Military or Federal Specifications and Standards, and the related clauses at 252.211-7004 and 252.211-7005. The approval for 0704-0398 expires on September 30, 2007. This request covers the burden hours related to the requirements at DFARS Section 211.273, Substitutions for Military or Federal Specifications and Standards, and the related clause at 252.211-7005, Substitutions for Military or Federal Specifications and Standards.

In addition, we have transferred 1,124 hours from the OMB Clearance 0704-0187, currently approved for use through February 28, 2009, to include the information collection requirement associated with the provision at DFARS 252.211-7004, Alternate Preservation, Packaging, and Packing.

The DFARS is available on-line at <http://www.acq.osd.mil/dpap/dars/dfars/index.htm>.

2. The information is used by the contracting officer to-

- a. Evaluate and award using commercial or industrial preservation, packaging, or packing, if the offeror chooses to propose alternate to military preservation, packaging, or packing specifications.

- b. Verify previous Government acceptance of an SPI process as a valid replacement for a military or Federal specification or standard cited in the solicitation.

3. Improved information technology will be used to the maximum extent practicable in obtaining this information.

4. As a matter of policy, DoD reviews the DFARS to determine whether adequate language already exists. This information collection does not duplicate any other requirement.

5. The burden applied to small businesses is the minimum consistent with applicable laws, Executive orders, regulations, and prudent business practices.

- a. Only those contractors that wish to propose alternate

preservation, packaging, or packing are required to submit the additional documentation.

b. Approximately 300 ten contractors participate in the SPI, and it is estimated that most of these contractors are not small businesses. Furthermore, participation in SPI is voluntary and the purpose is to simplify contract requirements.

6. If the information is not obtained from the applicable offerors-

a. The contracting officer cannot evaluate the suitability of the proposed alternate preservation, packaging, or packing, and all offerors would be required to follow the military preservation, packaging, or packing specifications and potential cost savings might not be realized.

b. The offerors may not be able to substitute their SPI processes for military or Federal specifications or standards, and potential cost savings might not be realized.

7. There are no special circumstances that require the collection to be conducted in any manner listed in 5 CFR 1320.5(d)(2).

8. Public comments were solicited in the Federal Register on May 22, 2007 (72 FR 28688) as required by 5 CFR 1320.8(d) (TAB A). We received no comments in response to the request for comments.

9. No payment or gift will be provided to respondents, other than remuneration of contractors under their contracts.

10. The information collected will be disclosed only to the extent consistent with prudent business practice, current regulations, and statutory requirements. No assurance of confidentiality is provided to respondents.

11. No sensitive questions are involved.

12. Estimate of public burden.

a. **252.211-7004, Alternate Preservation, Packaging, and Packing, paragraph (b)**. This provision is prescribed at 211.272 for use in solicitations that include military preservation, packaging, or packing specifications when it is feasible to evaluate and award using commercial or industrial preservation, packaging, or packing. Paragraph (b) requires submission of information sufficient to allow evaluation of alternate packaging, only if the offeror chooses to propose alternate packaging.

We do not estimate any change to the estimate currently approve under OMB Clearance 0704-0187, in which we have estimated 375 solicitations per year with military preservation, packaging or packing specifications, average of 1.5 responses per solicitation offering alternative packaging, 2 responses per respondent, 2 hours per response, and an estimated cost of \$34 per hour:

| | |
|-----------------------------|---------------|
| Respondents | 281 |
| Responses/respondent | x <u>2</u> |
| Responses | 562 |
| Hours per response | <u>x 2</u> |
| Total hours | 1,124 |
| *Cost per hour | x <u>\$34</u> |
| Total annual cost to public | \$38,216 |

b. 252.211-7005, Substitutions for Military or Federal Specifications and Standards. The DFARS permits offerors responding to solicitations for previously developed items, described by military or Federal specifications and standards in the solicitation, to propose management or manufacturing processes, that have been previously accepted by the Department of Defense under the Single Process Initiative (SPI) as valid replacements for military or Federal specifications or standards. DFARS 211.273-3(a) and 252.211-7005(c) require an offeror proposing such SPI processes to provide the following information in its offer:

(1) Identify the specific military or Federal specification or standard for which the SPI process has been accepted;

(2) Identify each facility at which the offeror proposes to use the specific SPI process in lieu of military or Federal specifications or standards cited in the solicitation;

(3) Identify the contract line items, subline items, components, or elements affected by the SPI process; and

(4) If the proposed SPI process has been accepted at the facility at which it is proposed for use, but is not yet listed at the Internet site specified in the clause, submit documentation of Department of Defense acceptance of the SPI process.

Based on a review of the website at <http://guidebook.dema.mil/20/modified2005-02-15.xls>, approximately 300 contractors have approved SPIs. We estimate that each participant will respond to approximately 4 solicitations per year and that each response will take

approximately .5 hours.

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|---------------------------------------------|--------------|
| Number of respondents | 300 |
| Number of responses per respondent per year | 4 |
| Total annual responses | 1200 |
| Hours per response | <u>x .5</u> |
| Total burden hours | 600 |
| *Cost per hour | <u>x\$34</u> |
| Total public cost | \$20,400 |

*Cost per hour is based on the equivalent of a GS-11, step 5 salary, plus 32.85 percent burden.

c. Total

| | | |
|-----------------------------|---------------|-----------------------------|
| Respondents | 581 | |
| Responses/respondent | <u>x 3.03</u> | |
| Responses | 1,762 | |
| Hours per response | <u>x .98</u> | (total hours/ responses) |
| Total hours | 1,724 | |
| *Cost per hour | <u>x \$34</u> | |
| Total annual cost to public | \$58,616 | |

13. None.

14. Estimated annual reporting cost to the Government.

We estimate the annual cost to the Government to review and analyze the responses to this information collection requirement to be 1 hour per response, at \$34 per hour, based on GS-11, step 5 salary plus 32.45 percent burden.

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| Number of responses | 1,762 |
| Avg. hours per response ¹ | <u>x 1</u> |
| Total hours | 1,762 |
| Cost per hour | <u>x \$34</u> |
| Total annual cost to Government | \$59,908 |

15. There is a change in the estimated burden hours for DoD due to an increased estimate of the number of respondents participating in SPI. In addition, 1,124 hours have been transferred from OMB Clearance 0704-0187, in order to consolidate the information collection requirements for 2 related sections of DFARS Part 211.

16. Results of this information collection will not be tabulated or published.

17. We do not seek approval to not display the expiration dates for OMB approval of the information collection.

18. There are no exceptions to the certification accompanying this Paperwork Reduction Act submission.

B. Collections of Information Employing Statistical Methods

Statistical methods will not be employed.