

SUPPORTING STATEMENT

A. JUSTIFICATION

1. This is a request for a reinstatement of the information collection requirement previously approved under OMB Control Number 0704-0252, Defense Federal Acquisition Regulation Supplement (DFARS) Part 251, Contractor Use of Government Supply Sources. This request covers the burden hours related to the requirements at DFARS Part 251 and its associated clauses. There are currently two (2) clauses in Part 251:

- 252.251-7000, Ordering from Government Supply Sources (NOV 2004);
- 252.251-7001, Use of Interagency Fleet Management System (IFMS) Vehicles and Related Services (DEC 1991).

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

- a. The clause at DFARS 252.251-7000 requires contractors to provide a copy of an authorization when placing an order under Federal Supply Schedules, Personal Property Rehabilitation Price Schedules, or Enterprise Software Agreements.
- b. The clause at DFARS 252.251-7001 requires contractors to submit requests for use of Government vehicles when the contractor is authorized to use such vehicles. The clause also specifies the information to be included in the contractor's request.

2. The information to be submitted pursuant to the two clauses addressed in this justification allows contractors to—

- a. Place orders under schedule contracts and requirements contracts or for Government stock when specifically authorized by the contracting officer as a means of fulfilling the contract's requirements; and
- b. When authorized use of IMFS vehicles, to submit requests for up to five (5) vehicles and related services in the performance of Government contracts.

The information is used by the Government to verify that contractors are authorized to place such orders and use such stock.

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

4. As a matter of policy, DoD reviews the DFARS to determine whether adequate language already exists. The language in DFARS part 251 applies solely to DoD and is not duplicative of the language in Federal Acquisition Regulation (FAR) part 51. Similar information is not readily available to the Government.

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 use less expensive and more efficient Government sources or stock need to provide this information.

b. Only those contractors that wish to use Government vehicles in lieu of incurring the costs of renting or purchasing vehicles need to provide the information.

6. DoD reviewed the frequency for collecting this information and verified that it is the minimum necessary to obtain from the Government the supplies or vehicles to enable contract performance. Every attempt has been made to keep the frequency of collection to a minimum without jeopardizing the ability of the Government to assure that contractors are authorized to—

a. Place orders under Federal Supply Schedules, Personal Property Rehabilitation Price Schedules, or from Government stock; or

b. Use IMFS vehicles.

Collecting this information less frequently would raise the cost of contract performance and, ultimately, the cost to the taxpayer.

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 July 15, 2010 (75 FR 41161) as required by 5 CFR 1320.8(d) (TAB A). No public comments were received in response to the request.

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. The estimates were developed by DoD specialists involved in the processing of information collected, because there is no centralized data available concerning the number of respondents or responses. We estimate that there has been no change in the use of Government sources of supply or IMFS vehicles by contractors since the last information collection approval. Therefore, we estimate that 3,500 contractors will provide an average of 3 responses a year. We estimate it takes approximately 30 minutes to prepare and submit the information required by the clause.

a. Number of respondents	3,500
b. Responses/respondent	<u>x 3</u>
c. Total annual responses	10,500
d. Hours per response	<u>x 0.5</u>
e. Total hours	5,250
f. Cost per hour*	<u>x \$30</u>
g. Total annual cost to public	\$157,500

*The hourly cost is updated to reflect the OPM 2010 rate of \$22.57 an hour for the equivalent of a GS-9 step 5 plus overhead of 33 percent, rounded to the nearest dollar, or \$30 an hour.

13. Estimated nonrecurring costs. None.

14. Estimated annual reporting cost to the Government.

We estimate the annual cost to the Government as 30 minutes to review the information submitted by the contractor.

Number of responses (from para. 12)	10,500
Hours per response	<u>x 0.5</u>
Total hours	5,250
Cost per hour	<u>x \$30</u>
Total annual cost to Government	\$157,500

*The hourly cost is updated to reflect the OPM 2010 rate of \$22.57 an hour for the equivalent of a GS-9 step 5 plus overhead of 33 percent, rounded to the nearest dollar, or \$30 an hour.

15. This is a reinstatement of a previously approved collection without any changes. The adjustment in costs is the result of using the updated 2010 adjusted wages.

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

17. We do not seek approval not to 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.