

PUBLIC SUBMISSION

As of: 5/22/25, 8:03 AM
Received: May 14, 2025
Status: Pending_Post
Tracking No. mao-hmtv-64ng
Comments Due: July 06, 2025
Submission Type: Web

Docket: GSA-GSA-2025-0001
GSA Information Collections -2025

Comment On: GSA-GSA-2025-0001-0012
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Acquisition Regulation; Modifications (Federal Supply Schedule)

Document: GSA-GSA-2025-0001-DRAFT-0005
Comment on FR Doc # 2025-07842

Submitter Information

Email: kgrogan@kandge.com
Organization: K&G Enterprises

General Comment

K&G Enterprises has submitted hundreds of modifications to the GSA Multiple Award Schedule (MAS) program on behalf of our clients offering both products and services. Our extensive experience with the eMod system has given us a comprehensive understanding of both the procedural requirements and the practical realities of contract modifications.

The clause presented here is what requires a cover letter to summarize modification details and it is increasingly redundant in practice. The eMod platform inherently captures all necessary information through structured fields, mandatory document uploads, and mod-type selection. The estimated time you have calculated is accurate if it only represents the need to create a cover letter. The actual time to prepare a modification including all necessary documents is significantly higher. Below is a breakdown of that information:

1. Reference 552.238-82 (a)- Submitting the modification in eMod is submitting a request to the CO for approval. A separate letter is redundant.
2. Reference 552.238-82 (b)- Types of modifications are selected in eMod. Repeating which mod type the vendor selects in a cover letter is redundant. GSA can see the "modification type" in eMod when they review the package.
3. Reference 552.238-82 (b)(i)- The request for CSP information is automatically prompted by eMod. Addressing this in a cover letter is redundant.
4. Reference 552.238-82 (b)(ii)-This information is on the Price Proposal Template and listing on a cover letter is redundant.
5. Reference 552.238-82 (b)(iii)- This is vague in nature, it is logical to say if a vendor is adding a product or service via eMod, it is because they want to offer this to GSA. This is unnecessary and not relevant to the solicitation requirements.
6. Reference 552.238-82 (b)(iv)- This is entered on the Pricing Terms document which is required by the modification instructions.
7. Reference 552.238-82 (b)(v)-The country of origin is addressed on the PPT, Letter of Supply and VPP. The Point of Production is incorporated at the master contract level. If an additional Point of Production

- or Place of Performance needs to be added at the master contract level, that is a separate modification that would have to be issued in eMod so this requirement is not necessary at the modification level.
8. Reference 552.238-82 (b)(vi)-This can be addressed in eMod via a prompt. It is in eOffer for new offers but not in eMod at this time. It seems it could easily be added as a prompt in eMod or in the modification instructions to be addressed if it is applicable. This is very specific to a small number of SIN(s) and seems misplaced in this clause.
 9. Reference 552.238-82 (b)(vii) For contract, as long as the contractor's SAM registration is active and compliant, the Reqs & Certs—including those addressing BAA compliance—are already satisfied. The eMod system won't even let you login if your SAM account isn't active so this is redundant.
 10. Reference 552.238-82 (2) Deletions- The explanation for a deletion is not necessary to evaluate a modification. If a vendor chose to delete anything from their schedule, that is their objective, and an explanation would not affect the CO's decision in awarding the modification.
 11. Reference 552.238-82 (3) Price Reductions-this can be addressed in the modification instructions specific to price reduction modifications. It can also easily be addressed in a prompt within eMod if the vendor selects the mod type of "Permanent Price Reduction".
 12. Reference 552.238-82.(c)- Effective dates of any additions or deletions is when the CO signs the mod. The effective date of a Commercial price change is already required in both the CSP and on the Commercial or Market Pricelist. This is redundant.
 13. Reference 552.238-82.(d)-This is addressed in the solicitation that the pricelist has to be updated within 30 days of the date of the contract award or a modification award. This is redundant.
 14. Reference Alternate I- Electronic submission via eMod is the only way a vendor can submit a modification, and this is clear in the solicitation and modification instructions, so this is redundant.
- Please do not hesitate to contact me with any questions. We are happy to offer feedback on any area of the solicitation to help improve efficiency.