

# PUBLIC SUBMISSION

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Agency Information Collection Activities; Proposals, Submissions, and Approvals: Federal Acquisition Regulation Part 27 Requirements; OMB Control No. 9000-0095

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## Submitter Information

**Name:** Kurt Worden

**Address:**

Sterling, VA, 20166

**Email:** kurt.worden@novapower.com

**Phone:** 6192454550

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## General Comment

On behalf of NOVA Power Solutions, Inc., a small business specializing in ruggedized uninterruptible power systems for U.S. Navy, Coast Guard, and DoD programs, we submit the following comments regarding the proposed extension of the information collection under FAR Part 27 (Patents, Data, and Copyrights):

### 1. Support for Continuation

We agree the collection is necessary to protect Government rights in data and inventions and support its continuation.

## 2. Burden Estimate Accuracy

The notice estimates 55,600 annual hours across industry. Based on NOVA's experience, the actual burden for small businesses is higher because:

Preparing data rights assertions and license letters requires legal review and coordination with primes.

Responding to marking challenges and preparing royalty statements involves multiple stakeholders.

Maintaining invention disclosure systems adds overhead even when no inventions arise.

For a single complex proposal, NOVA expends 20–30 hours on FAR Part 27 compliance tasks alone. We recommend revisiting the burden model to reflect small business realities.

## 3. Duplication with DFARS

DoD contracts require compliance with both FAR and DFARS data rights clauses, creating redundant reporting. We urge harmonization or cross-acceptance to reduce duplication.

## 4. Process Improvements

Enable standardized electronic templates for license letters and royalty reports via a secure portal.

Publish consolidated guidance clarifying when to use “Rights in Data—General” vs. “Existing Works” for commercial manuals and drawings.

## 5. Impact on Small Businesses

Compliance costs disproportionately affect small entities. We recommend simplified templates and optional certification checklists to streamline recurring submissions.

Conclusion: NOVA supports the extension but recommends burden recalibration, harmonization with DFARS, and adoption of electronic tools to minimize unnecessary cost and complexity.