

QUESTION NUMBER	DRAFT RFP SECTION NUMBER	COMMENTS/QUESTIONS/SUGGESTIONS
RECOMMENDATIONS:		
1	H.3.1, Page 39	We recommend that the Government consider reducing or eliminating set-asides for specific socio-economic groups, as it may reduce competition and otherwise eliminate companies that may be able to offer the best value to the Government for a particular task order. Should the government decide to keep these set-asides, then we suggest that the Government include other specific socio-economic groups, such as Minority-Owned, Small Disadvantaged Businesses.
		RESPONSE: Thank you for the input, but we disagree with the recommendation. The OASIS Program fully supports the small business community as a whole, including all socio-economic groups specifically identified and authorized for set-asides in the FAR. Taking the position that conducting set-asides reduces competition is akin to saying that there should be no OASIS SB, as that is a 100% set-aside. We simply disagree with that position. With regards to what groups are eligible for set-aside, that is an issue determined by regulation and law, not by our choice. We are allowing all set-asides authorized by the FAR.
2	H.7.5, Page 50	We suggest that the Government remove the requirement of attaining a minimum of three task order awards for the exercise of Option 1. While we understand the necessity of having active and involved contractors within the OASIS pools, individual contractors do not have control over the number or type of opportunities that will be offered to each pool. It is possible that three or more appropriate opportunities for a contractor's skill set may not materialize over the first five-year period, yet that contractor may still offer services or solutions that would provide value to the government for emerging needs during the option period.
		RESPONSE: There are two issues to address here. 1. We do not feel that winning 3 task orders within a 5 year period is overly burdensome for OASIS SB contract holders. Where applicable and within scope, we expect OASIS and OASIS SB contract holders to bring their existing business to the OASIS contracts and a five year time frame is ample time to do so. If a SB contractor cannot win 3 task orders within a 5 year window, then we feel that OASIS SB may not be a good fit for that contractor and we may attempt to find a different contractor who might be more successful. 2. Simply because we reserve the right to do something in the contract, doesn't mean that we have to. Regarding any contract performance issue, the OASIS team plans to collaborate extensively with the Contractor prior to invoking Dormant Status, Off-Ramping, and/or not exercising an option. We will be fair and reasonable with all OASIS and OASIS SB Contractors after award and want nothing more than the shared success of all members of our extended OASIS family.
3	H.11.1 and H.11.2, Pages 53-55	We recommend that the Government remove the requirement that the contractor "demonstrate successful performance under the OASIS SB contract" in order to be eligible for lateral or vertical pool ramping. While it makes sense to require successful performance should a contractor be awarded a task order, it is possible that a contractor's organic growth independent of OASIS may occur prior to receiving a task order award, thereby making the contractor ineligible to bid on future task orders. Under the draft requirements, this contractor would essentially be "locked in" without the ability to move to a new pool because they do not have a track record with OASIS and will not have the opportunity to achieve that track record due to their growth. This situation may create a disincentive for contractors to seek inclusion in a particular pool if there is not sufficient flexibility for growth and success.
		RESPONSE: OASIS SB contractors will not recertify size standard until the 5 year point. A contractor will be required to win at least 3 task orders by this point. Accordingly, we feel that the suggestion is moot.
4	L.2.3, Page 73	We recommend that the Government increase the number of awards in each pool. We believe a larger pool of qualified companies will provide greater competition and better potential value to the Government.
		RESPONSE: We selected 40 contractors based on our historic IDIQ experience. We will closely monitor competition levels at the task order level and on-ramp additional contractors when and if that becomes necessary.
5	L.3, Page 74	We recommend that the Government allow proposals for teaming arrangements (including prime and subcontractor arrangements) for OASIS. As the Government is seeking business-based solutions through OASIS, rather than technology-specific solutions, offerors may be able to provide more comprehensive solutions through a teaming arrangement. This is especially true for small businesses, as small businesses by necessity tend to be more specialized entities than larger, full-service firms.
		RESPONSE: Please see a number of responses to questions for the OASIS team opinion regarding teaming.
6	L.5.3.1, Page 80	We recommend that the Government remove the requirement that the primary scope of the relevant experience projects be within one of the six OASIS Core Disciplines (Minimum Condition 1). Our rationale is that the six core disciplines are fundamental components of numerous government contracts, but are not always framed as such within the RFQ or contract documentation. For example, a contract may have a stated primary scope such as "implementing an IT system". This hypothetical contract may include Program Management, Management Consulting, Engineering, and Logistics as fundamental aspects/tasks, but they are not defined as such within the statement of scope. We suggest that should the Government wish to retain the requirement, the contractor should be allowed to demonstrate that the relevant project incorporated these core disciplines even if they were not specifically designated as the "primary scope".
		RESPONSE: While we understand the rationale for your recommendation, we have reservations about considering an experience project as "relevant" when it could not be performed under the OASIS or OASIS SB contract.

7	Section M, M.5, Pages 89-96	As a general matter, we believe that the evaluation criteria overemphasize certifications and form as opposed to substantive experience and capability. For example, several of the evaluation criteria award a considerable amount of points for items such as past performance contract size and various certifications. This criteria may not be the most appropriate for the OASIS Small Business vehicle, as many small businesses have not yet had the opportunity to service large contracts or pursue official certifications due to financial and business reasons, even though the company may incorporate standards and industry best practices (such as ISO 9001 and CMMI) into its management and technical processes. We believe the evaluation criteria, as currently structured, may unnecessarily eliminate many qualified companies and reduce the overall level of competition. We believe that more emphasis should be placed on the substantive nature of past experience and current capabilities to provide a high level of service, rather than contract value and formal certification.
		RESPONSE: The scoring system places the highest amount of points on Past Performance. The second highest amount of points rests with Relevant Experience. Finally, Systems, Certifications, and Resources account for the lowest amount of potential points. We are not looking for all businesses to receive an OASIS or OASIS SB award. We are looking for companies who have actual relevant experience, actual successful performance, and existing systems, certifications, and resources. An Offeror who claims to incorporate the standards of ISO 9001 is not the equivalent of an Offeror who has been certified for doing so. Finally, the scoring system does not eliminate any Offeror, it only distinguishes between Offerors, which is what the source selection process is all about. We are looking for the Highest Technically Rated Offerors in these solicitations. We feel this evaluation approach will be successful in finding those Offerors.
8	OASIS SB - Section L.5.3.1 Relevant Experience Minimum Requirements - Pages 80-81	I think the requirements are too difficult for many small businesses to attain. Small businesses often have a balance of prime and sub work, where subcontracting is the starting point and usually the larger portion of work as you need the past performance prior to bidding prime work. Requiring 5 distinct Prime contracts having a value of at least \$2M a year is a challenge for many small businesses. First, 5 Prime contracts of at least \$2M a year would mean you have most likely already outgrown the \$14M NAICS size standard (assuming subcontracting work too), which would eliminate participants in Pool 1. Additionally, having 5 Prime contracts of that size within the scope of OASIS is a high hurdle for any potential Pool 1-3 candidates. Suggest requiring 1 or 2 contracts of the \$2M size standard vs. all 5 Prime contracts.
		RESPONSE: Thank you for the feedback and we will take it under consideration.
9	OASIS SB and Unrestricted - Section L.5.3.1 Relevant Experience Minimum Requirements - Pages 80-81	Cost-Reimbursement requirement is a high hurdle for businesses of any size. This is out of the control of the contractor. If the acquisition departments within the agencies we support prefer Labor Hours or Firm Fixed Price, we can't possibly obtain Cost-Reimbursement Contracts. If the scope of OASIS is to determine contractors who have the past performance and personnel who can perform the work, the mode of the contract shouldn't be considered. If the firm has a DCAA approved financial system, then Cost-Reimbursable contracts are feasible. Suggest lifting this requirement on both OASIS SB and OASIS Unrestricted.
		RESPONSE: Cost Reimbursement work is dominant in the field of professional services. Approximately half the dollars spent in professional services Government-wide was spent on a cost reimbursable basis. Audited accounting systems are required to perform this kind of work and having an audited accounting system is a firm requirement of this contract and the clients it will serve.
10	OASIS SB and Unrestricted - Section L.5.3.1 - pages 80-81 SB, 85 Unrestricted	The requirement for involvement and / or integration of 4 out of the 6 OASIS Core Disciplines in the Unrestricted and 3 out of the 6 in the OASIS SB is very restrictive. How will the government evaluate as this is dependent upon how the statement of work is worded, how the acquisition office awards tasks (i.e., they may separate the work streams), and assume the timing of all work streams aligns. Understanding the government would like to obtain companies that have performed these complex tasks, the current requirements are very restrictive and do not necessarily relate to the most qualified companies. Suggest removing this requirement from all 5 Prime contracts to 1 Prime Contract. This would provide the government with the past performance demonstrating the integration of the OASIS disciplines has occurred.
		RESPONSE: We have allowed for not only the Statement of Work to be provided to validate performance of core disciplines, but also contractor proposals as well. Additionally, you can provide Performance Work Statements, Statements of Objectives, and/or Work Breakdown Structures for validation. There should be some indication of the core disciplines you have performed within one or more of these documents.
11	L.5.3.1	It is noted that small businesses must have five distinct past performances as a prime contractor. Can this be modified to be five distinct past performances as either a prime contractor or a subcontractor?
		RESPONSE: We are in the draft mode right now, so anything is possible, but we asked for Prime experience because we wanted contractors with the ability to win requirements, put together teams, and be responsible for the outcomes. This is very important to us and our clients as well.
12	L.5.3.1 Page 80	The relevant experience is requiring FIVE projects as a PRIME contractor that are over \$2M per year. This requirement is very restrictive for a SB and will reduce competition. Suggest decreasing the number of cites to be THREE, allowing SUB contracts, and reducing the value to over \$1M per year.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
13	L.5.3.1 Page 80	The relevant experience instructions (#1) state the projects must have the "primary scope of work in 1 of the 6 OASIS Core Disciplines". Suggest rewording to clarify that the "primary scope of work in one or more service areas within at least 1 of the 6 OASIS Core Disciplines".
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
14	L.5.3.1 Page 80	The relevant experience instructions (#2) state the projects must "involve the performance and/or integration of at least 3 out of the 6 OASIS Core Disciplines". Suggest rewording to clarify that the projects must "involve the performance and/or integration in one or more service areas within at least 3 of the 6 OASIS Core Disciplines".
		RESPONSE: Thank you for the recommendation. We will take it under advisement.

15	Section L.3, Page 75	<p>Section L.3 prohibits competition for those large businesses structured by subsidiaries, and legal entities. To not limit competition, and allow such structured companies to compete for contract award on the OASIS Solicitation, we request GSA replace the restrictive language in the Draft OASIS Section L.3 with the language from the GSA Alliant Contract Section L.12.2.h (listed below). The current requirements within the Draft OASIS Solicitation are written in such a manner as to indicate that a large business, if prohibited from utilizing its subsidiaries and legal entities, can proceed to bid within the six pools as long as the Company's entities fall within those size standards. Is this the intent on GSA's part to allow for a large business not structured in such a way as to bid as large business to be able to bid within as many of the six pools as feasible?</p> <p>GSA ALLIANT L.12.2.h (h) Affiliates – The Offeror shall identify the number of affiliates projected to participate on the Alliant Contract. Commitment letters from affiliates shall be provided with the Offeror's proposal.</p> <p>(1) Such information conforms to the requirements as set-forth herein; (2) There is a "meaningful relationship" between the affiliate, division and/or subsidiary of the Offeror for purposes of performance under Alliant; and (3) The Offeror provides the Government, as required under Section L.12.4, Folder D, a "commitment letter" from the affiliate, division or subsidiary of the Offeror which demonstrates the specific nature of the "meaningful relationship" and the resources that the affiliate, division or subsidiary of the Offeror will devote to Alliant.</p>
RESPONSE: We are currently editing this and will have an update posted shortly.		
16	OASIS SB and Unrestricted - Section L.5.3.1 Relevant Experience Minimum Requirements - Pages 80-81 - Clarification to Response #9	<p>Clarification Request: The government requests "At least One project must be for work performed under a Cost-Reimbursement contract type". As a professional services small business, we have not performed any Cost-Reimbursement Contracts since the acquisition departments within the agencies we support prefer Labor Hours or Firm Fixed Price contracts. We have a DCAA approved financial system, and therefore are able to comply with a Cost-Reimbursable Contract, but have not performed one. Since the audited financial system allows for Cost-Reimbursable, we request lifting the requirement on both OASIS SB and OASIS Unrestricted that one of the five projects must be Cost-Reimbursable.</p>
RESPONSE: Thank you for the recommendation. We will take it under advisement.		
17	Section M.5 starting on Page 94	<p>The scoring system includes a scored item for AS9100 certification. We do not understand how this certification applies or brings value to several of the pools and request that it be removed from scoring across all pools.</p>
RESPONSE: Scoring is not tailored to individual Pools. Scoring is universal across all Pools. The AS9100 certification is of relatively low scoring impact, but we will take this recommendation under advisement.		
18	Section L.5.1.7 on Page 79	<p>Page 79 includes requirements for CTA arrangements. These restrictions appear to be overly stringent for small businesses. Unless a small business has been fortunate enough to be included in a prior CTA for a reason other than for OASIS, they are not allowed to form a CTA for the purpose of an OASIS bid. In addition to the CTA restrictions, a small business cannot include subcontractors in their proposal or use their qualifications or past performance. We believe that the CTA requirement is overly restrictive. While we understand that OASIS is a long term arrangement, it appears that these restrictions will greatly limit GSA from receiving strong bids from good companies. In addition, we believe that this restriction provides unfair advantage to certain companies that have, for reasons unrelated to OASIS, are members of a CTA. We request that GSA remove the CTA restriction, so that small businesses can actually form a CTA for the purpose of competing for an OASIS award.</p>
RESPONSE: Please see the various responses regarding teaming.		
19	General Question	<p>We see no difference between the unrestricted OASIS and OASIS SB drafts except for subcontracting plans, accounting systems and changes in limits and points within the scoring sheets. We believe that there is not enough consideration of the limitations that small businesses have in relationship to large businesses and that the criteria for small businesses is overly restrictive. Examples include points allocated for multiple certifications which many small businesses do not have and cannot afford to obtain, limitations of forming CTAs, revenue limitations within the scoring sheet for small businesses that start at \$3 million annually which is a substantial contract award for small companies, much less the larger revenue amounts of \$4 Million and \$5 million in the score sheet. We recognize that GSA is trying to allow for ranges in scoring, but even the lowest ranges are ominous for many small businesses that could otherwise perform OASIS work. Request that GSA review the small business criteria and revise it so it is more reasonable for small businesses.</p>
RESPONSE: Only Pass/Fail factors can be restrictive. Scoring systems do not prevent a company from submitting a proposal and are not restrictive by definition. Points and scoring only serve to distinguish between contractors. If no SBs within a given pool score within a point category, then the category has no bearing on the outcome of the Top Rated Offerors. However, if some SBs do obtain those points when most do not, then that is an effective segregating factor. We feel that we will obtain a very highly qualified group of Contractors for both OASIS and OASIS SB with the current approach, but we are also listening and considering all feedback received. We are currently working on edits to both contracts that we will share as soon as they are vetted and decided upon, which should be soon.		
20	Section F.4.1; page 24; Table Section G.3.4.1	<p>Recommend deleting this deliverable, since the Government is responsible for entering CPARS data. The contractor's CPARS responsibility to review their ratings/comments is covered in para F.4.2, Section G.3.4.</p>
RESPONSE: Thank you for the recommendation. We will take it under advisement.		
21	Section L.5.1.7, page 79	<p>Small Business concerns generally team to integrate strengths needed to fulfill the requirements of a specific solicitation. The OASIS requirement to limit CTAs to an existing CTA Partnership or Joint Venture appears to seriously limit SB opportunity to propose to the OASIS solicitation. Recommend removing the requirement that CTAs be existing to promote competition and provide best value to the Government.</p>
RESPONSE: Please see earlier response regarding teaming.		

22	Section L.5.3.1, page 80	The requirement to provide 5 relevant project experiences valued at least \$2M per year appears to be unduly stringent for SB concerns that intend to propose under Pool 1 with a \$14M threshold. To provide best value to the Government, out of the 5 projects required, recommend reducing the required number of relevant projects to 2 that have a total value of \$1M per year for Pool 1 offerors. By reducing the number of contracts and reducing the contract value, the Government will open competition to a larger number of SB offerors, allowing the Government to attain its 40 awardee goal.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
23	L.5.3.1 Relevant Experience Minimum Requirements; Page 80	We suggest maintaining the 5 Relevant Experience Citations, but requiring only 2 to be as a prime. We understand and greatly respect the desire of OASIS to only award to the best possible prime companies. With this in mind, perhaps only lessen the prime requirement for offerors submitting in the \$14 Million Pool.
		RESPONSE: We will consider your recommendation, but we sincerely feel that there is a large difference between sub experience and prime experience.
24	L.5.3.1 Relevant Experience Minimum Requirements; Page 80	We suggest that for the \$14 Million Set-Aside Pool, that the \$2M/year size requirement be eliminated, as it will preclude companies from demonstrating many of their relevant experiences.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
25	L.5.4.2. Past Performance (Proposal Submission, if applicable), Page 82	Regarding the requirement for the Government to pull all federal project past performance information from the Past Performance Information Retrieval System (PPIRS) database that links to the Contractor Performance Assessment Reporting System (CPARS), this will not be effective if the OASIS team allows for offerors to submit relevant experience information for previous/current work as a subcontractor. For example, we have strong past performance with exceptional ratings from our PRIME contractor, and our prime contractor gets excellent ratings for their subcontractor performance on their CPAR evaluations, but this information will not directly specify our company. For these contracts - all though they do support the federal government - we will need to be allowed to submit a Past Performance Rating Form to our prime contractor for evaluation. Currently, these forms are only allowed for non-federal contracts, or contracts where evaluations have not been completed.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
26	M.5	We recommend increasing the point thresholds on the OASIS SB contract for Relevant Experience to \$3M, \$6M, and \$9M. Although these higher thresholds may seem too large for the Small Business tract, there would be a much less chance for a contractor to be awarded additional evaluation points for performing the exact same work within a higher priced labor market due to performance location requirements. This is also true for professional service contracts that bundle Other Direct Costs such as significant Information Technology hardware and software into a single contract instead of using a separate contract to acquire those items.
		RESPONSE: Thank you for the recommendation. There was quite a bit of analysis provided with this suggestion and we are very appreciative of that. We will take it under advisement.
27	Section L.5.4.3, page 87	Section L.5.4.3, Socio-economic Past Performance, requires that eSRS reports be provided for the 5 Relevant Experience contracts provided in L.5.3.2. What if a Relevant Experience reference meets the size criteria, but does not have a Small Business Subcontracting Plan associated with the contract? We suggest allowing offerors the opportunity to show their total corporate performance in meeting Small Business Goals for all contracts that have a Small Business Subcontracting Plan and can be verified in the eSRS system. This will allow mid-sized and small companies the opportunity to show their full performance on small business subcontracting.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
28	M.2 / 95	On the unrestricted contract, how does a contractor qualify for one of the pools? Is it by simply stating they are interested? Or do they have to have one of the NAICS codes associate with that pool? Having a NAICS code is not a discriminator. Every large company will have one of the NAICS codes associated with all the pools. Therefore, we believe all the large companies will qualify for all the pools. This means that the same 40 large companies will win each of the six pools. Is this the Government's intent?
		RESPONSE: Offerors will be evaluated in the Pools that they indicate that they desire to be considered for. NAICS codes associated with their Relevant Experience will not be examined.
29	M.5, page 101	Since this is primarily a professional services contract and not a primarily a development contract, we believe that points should only be given for CMM Level 3. Higher CMMI levels are not needed on efforts that are primarily professional services
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
30	M.5, page 100 and Section L.5.3.1, page 85	The solicitation requires offerors to provide a minimum of 5 Relevant Experience references with a minimum value of \$5 million per year. However, Section M.5 gives 0 points for contracts with a \$5 million per year value, effectively making the minimum \$10 million per year. We believe the requirements of the Relevant Experience and Past Performance significantly advantage the very large contractors. Mid-size companies in the services market generally only have a few contracts with a \$10 million per year or more value, especially in the Program Management, Management Consulting, Logistics, and Financial work areas. A requirement which allows for points at the \$5M per year value will allow for more competition from mid-size companies.
		RESPONSE: Relevant Experience is provided additional points based upon dollar value because this is a sign of complexity. Past Performance, however, has no basis in dollar value at all.
31	Section M.5, page 100	The scoring system allocates significant points for the execution of larger programs as measured by total dollar value. Since larger programs are not necessarily more complex to manage, do not necessarily represent more work brought to a vehicle, or necessarily have anything to do with delivery performance, we would like to understand why extra points are awarded for deal size. This metric has the potential to favor larger companies without an apparent benefit to a GSA client. As such, we suggest the extra points for large deals be eliminated.

		RESPONSE: Larger programs at very least require more resources. While they may not always be more complex to perform and manage, they generally are. The scoring system does not favor one type of contractor over another. What the scoring system does is reward Past Performance, reward complex experience, and reward having systems, certifications, and resources necessary to perform complex work.
32	Page 11 - B.1.5. Contract Access Fee (CAF)	Ref Govt Feedback Topic 4 – The lower the GSA the more attractive OASIS will be to clients.
		RESPONSE: Thank you for your feedback.
33	Page 29 – G.2.6.	Recommend changing this to, "Any proposed COPM/COCM substitute shall meet or exceed the qualifications listed in G.2.6.1 or G.2.6.2, as appropriate." Rationale: Minimum skills are a better way to gain acceptable substitutes. Using the resume of the incumbent results in a constantly growing skill requirement that eventually greatly exceeds the needed level of experience and education.
		RESPONSE: Thank you for the recommendation. The intent here was to ensure that Offerors maintained the level of qualifications considered and scored in receiving their contract awards. We will edit accordingly.
34	Page 83 - L.5.1.6.2.b.	"It is anticipated that an acceptable subcontracting plan will contain at least the following goals: 50% Small Business..." Bidding OASIS is a major investment for a mid-sized company, and the federal market is in a period of contraction. To make this investment while essentially committing to providing at least half of the business to other companies is a significant burden, restrains trade, and places an unfair burden on capable companies who exceed an arbitrary size standard based on the selected NAICS codes...
		RESPONSE: You seem to be misinterpreting the 50% subcontracting goal. This goal applies to dollars subcontracted, not total award amount.
35	Page 85 - L.5.3.1.	The Relevant Experience Minimum Requirements effectively excludes businesses who have recently outgrown their small business size. While our average revenue has exceeded the \$35.5M of Pool 3 in OASIS SB, and we have been the prime on several IDIQs with total revenue exceeding \$5M annually, individual Task Orders typically do not. We recommend that you reduce the minimum annual revenue to \$3M OR allow companies to group all Task Orders awarded under an IDIQ as one of the Relevant Minimum Experience projects.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
36	Page 100 - M.5.	Grading Criteria for L.5.3. Why do you provide additional points for merely having a greater total revenue over the last five years? Quantity is not the same thing as quality. This approach puts companies that have recently outgrown their small business size at a distinct disadvantage. For example, a mid-sized company may have doubled their revenue in the five year period and still not exceed \$50M per year in total award value, while a large business may have lost half of their total revenue and still exceed the \$50M per year. The grading doesn't reflect the company growth or business trend. Recommend you simply have the revenue minimum as a pass/fail and use other quality markers for the points value.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
37		I understand the logic behind requiring your small business prime contractors to demonstrate their maturity and capability by providing 5 prime contract references that each are more than \$2M per year in award value. I like the idea of separating the wheat from the chaff and understand the benefits to GSA... However, relative to the \$14M sized pool I think the requirement will greatly limit the number of firms that can propose on the contract. In my experience, the vast majority of firms that can fit under the \$14M standard do not have 5 ongoing task orders that each generate more than \$2M in revenue per year. For your \$14M pool, I suggest you make some adjustments to the requirement, but still keep the bar fairly high. For example, perhaps for the \$14M pool should continue to require 2 references at the \$2M dollar level, and 3 additional references each at the \$1M dollar level?
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
38	OASIS SB Draft RFI, L.5.3.1, page 80	The OASIS SB Draft RFI requires that a minimum total award value of \$2 Million per year apply to work cited for experience. Five (5) such examples are required. It is unlikely that there will be many contractors who meet this requirement while satisfying a size standard associated with Pool 1 and Pool 2 (e.g., \$14M, \$19M). In Pool 1 and 2 this has the practical effect of limiting competition to companies who within the past five (5) years had contracts satisfying the requirement and who no longer have them. Additionally, contractors with five (5) active contracts of such a size would presumably exceed the size standard within the next five (5) years and be subject to being off-ramped from Pools 1 and 2. As such, my suggestion would be to reduce the requirement to \$1M in annual award value for Pool 1 and Pool 2 OASIS small business contractors.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
39	OASIS SB Draft RFI, L.5.3.1, page 81	The OASIS SB Draft RFI requires that projects be completed within the past five (5) years or be ongoing with at least one (1) year of performance prior to solicitation closing date. Believing that a new project on its eighth month of performance is a better barometer the current capabilities of a small business than a project completed 4 years and 11 months ago, I would suggest that the requirement of one (1) year of performance completed prior to the closing date be removed.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
40	OASIS SB Draft RFI, L.5.3.1, page 81	The OASIS SB Draft RFI requires that at least one (1) project must be for work performed under a cost-reimbursement contract type. Small businesses are Cost Accounting Standards (CAS) exempt per CFR 9903.201-1(b)(3) and are able to perform on non-fixed price contracts under FAR 16.104(h) which only requires CO approval of the contractor's accounting system. As such, many small businesses (particularly those who will qualify for Pool 1 and Pool 2) have not undergone DCAA, DCMA, etc. audits. For these reasons, I suggest the removal of the requirement of including one (1) project that was performed under a cost reimbursement contract type for Pool 1 and Pool 2.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.

41	OASIS SB Draft RFI, L.5.5.1, page 82	The draft RFI requires that written verification of audit by DCAA, DCMA, or a Federal Civilian Agency. Given that a contractor cannot request an audit by DCAA, DCMA, etc., would OASIS CO's request a pre-award audit by a cognizant audit board? Then, accept positive results as satisfaction of this requirement. Alternatively, I would suggest that this requirement be removed altogether or that audited financial returns be accepted in satisfaction of this requirement.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
42	OASIS SB Draft RFI, L.5.1.7, page 79	This comment is provided to note that I support OASIS's requirement that Contracting Teaming Agreement (CTAs) must have been established in advance of this solicitation. Waiver of this requirement would effectively allow savvy contractors to subvert solicitation requirements that experience belong to the prime contractor.
		RESPONSE: Thank you for your feedback.
43	L.5.5.1 - Pg 82	Adequate Accounting System - If the offeror does not have audit verification of an adequate accounting system but is certain that its accounting system has been found adequate in accordance with FAR 16.301-3(a)(1), will GSA accept a letter from a cognizant audit representative verifying the adequacy of the contractor's accounting system. Most small businesses under the \$14mil threshold have adequate accounting systems that are just not DCAA verified either due to 48 CFR 9903.201-1 CAS exception for small businesses or have a monetary exemption for not receiving contracts subject to CAS totalling \$50 million or more in the cost accounting period. It would therefore be prejudiced to exclude small businesses from bidding on OASIS even if they have adequate accounting systems and controls. A similar approach has been used across other large acquisitions like NIH CIOSP3 SB and DHS EAGLE II and we recommend that GSA re-evaluate this requirement.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
44	L.5.3.1 - Pg 80	Relevant Experience Minimum Requirements - The requirements for past performance especially for Pool 1 are discouraging. We don't think the government should mandate minimum award value or type of contract (T&M, Cost Reimbursement etc). Most small businesses start off small with the government by getting onto small programs and doing good work to get recognized for other award. For example, just because an award to the small business was less than \$500K does not mean the work was less valuable or critical than a contract worth \$2 mil. In addition, the restriction of 3/5 contracts to be with the Federal Government is unwarranted. We believe that most commercial best practices are slowly being adopted by the Government. So if at all, GSA is looking for contractors with innovative solutions and ideas then they should accept commercial past performances more openly than published. For example if a contractor has done logistics work for Fedex or UPS does not mean their logistics experience is second to work in the government. In fact it would be to the contrary. We therefore encourage GSA to revisit this criteria.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
45	L..5.5.3/4/5 - Pg 83	Is GSA being un-realistic by having a Pool 1 contractor have an Audited Estimating System , approved Forward Price Rate Agreements and an approved Purchasing System for \$14 million companies. Even though GSA states "if available" there are still points allocated for all these requirements. These systems cost a lot to own and maintain and quite frankly beyond the bounds of most companies in the \$14 million threshold. GSA should therefore provide a grading point system based on the level of the Pools rather than a "one size fits all" approach.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
46	L5.5.6/7/8 - Pg 84	Most small business can afford to have Quality Certification for the organization. Getting appraised for a certification and its continuous implementation and recertification is an expense that a small business undertakes. However, expecting a \$14 mil company to show all three is would require significant expense. We therefore request GSA to change this to allow a contractor to show one of the certifications and assign points to the overall quality certification rather than all three individually.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
47	L.5.5.9 - Pg 85	Earned Value Management System. - Small businesses are exempt for the whole EVMS life-cycle and are allowed to implement the 10 Core EVM reporting requirements and need not be audited. GSA should therefore look at a different approach for Pool1 and Pool 2 offerors, like an EVMS implementation plan to meet the Core EVM requirements.
		RESPONSE: Please provide a reference that indicates that small businesses are exempt EVMS. If what you say is accurate, however, then no small business would have an EVMS and accordingly, the points associated with EVMS would be irrelevant in the evaluation of those Pools.
48	F.3, p. 23	Should read "with 1 (5-year) option..."
		RESPONSE: Thank you for the edit.
49	H.3, p. 38	End of first paragraph should read "...and, comply with the ordering procedures..."
		RESPONSE: Thank you for the edit.
50	H.4.2, p. 40	Second paragraph should read "...reporting system ensures in that the appropriate..."
		RESPONSE: Thank you for the edit.
51	H.6.6 - H.6.9, p. 44-45	Maintaining quality control and management control certifications can be costly. In the case of many small businesses, they are cost prohibitive (it is worth noting that the cost to acquire and maintain these "certifications" are often passed onto customers through higher rates and baked-in quality control measures in FFP tasking). Would the GSA consider some appropriate mix of certifications and incorporation of industry standard best practices as a realistic demonstration of infrastructure control and process maturity?
		RESPONSE: No. While we understand that certifications can be expensive, the objective of the evaluation system is to distinguish between Offerors. Those companies who have invested the time, money, and effort to obtain these certifications will be rated higher than those who have not. Furthermore, there is no way that we know of to objectively measure "best practices". What is considered "best" usually varies greatly from contractor to contractor, which is why we have placed more value on certifications.
52	H.7.1, p. 48	Second paragraph should read "Follow-up meetings may be held..."
		RESPONSE: Thank you for the edit.
53	H.8, p. 50	First paragraph, second sentence is a little confusing. Perhaps instead - "The contractor shall train Contractor personnel..."

		RESPONSE: Thank you for the edit.
54	L.5.3.1, p. 81	In our experience, it is very unusual for an IDIQ vehicle to issue a small business set-aside, cost-reimbursable task order. So, having a cost-reimbursement contract type under Relevant Experience as a pass/fail criterion is far too great an obstacle for small businesses. You will have very few proposals pass Acceptability Review. Please reconsider this as a pass/fail requirement.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
55	G.3.1 on page 30	How, if any effect, would a CAF adjustment impact pre-adjustment Awards including all Options? Recommend adding "CAF adjustments will not effect previously awarded Task Orders".
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
56	L.4 on page 76	font type and size shall (12) point Arial. Recommend allowing larger and smaller font in graphics, figures, and tables.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
57	L.5.3.1 on page 80	Five (5) distinct projects, each as a Prime Contractor.... Recommend deleting this requirement as it precludes many Small Businesses from competition. Evaluation Criteria allows compnaies with more Prime Contracts to score higher.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
58	M.5 on page 94	Annual values are very high for most Small Businesses in Pool 1. Evaluation Criteria will result in less competition in Pool 1. Recommend reducing dollar value for 50 pts to \$1M allowing the smaller businesses to score under criteria.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
59	M.5 on page 95	COPM years expereince is high for Small Buisnesses. Recommend changing 10 years to 5 and 15 years to 10 to increase competition among Small Businesses.
		RESPONSE: Thank you for the recommendation. We will take it under advisement.
60	Section L.5.3.1 Relevant Experience Minimum Requirements	Will GSA consider lowering the threshold requirements for past performances, in particular the requirement that each relevant experience must include 4 out of the 6 core disciplines, and that projects have a minimum award value of at least \$5 million per year. Keeping the thresholds at these levels may unintentionally constrain the number of highly qualified mid-tier companies (those companies with annual revenues between \$10 million and \$1 billion) that can prime and potentially provide innovative solutions on OASIS. In many cases, mid-tier companies have greater capabilities than small businesses, and are highly motivated, less bureaucratic, and more agile than large businesses, but just as stable. In addition to increasing the diversity of industry partners, lowring these thresholds may have the added benefit of making OASIS attractive to a wider range of government anenciiies.
		RESPONSE: It is unlikely that we will lower the requirements on the OASIS solicitation as we feel that there is an ample supply of vendors (both "mid-sized" and "large") that will be able to meet these standards.
61	Section L.5.3.1 Relevant Experience Minimum Requirements	Will GSA consider eliminating the requirement that at least one of the relevant experience projects include work performed under a cost-reimbursement contract type?. We believe this is unnecessary, since any accounting system certified by DCAA or DCMA must have the capability of tracking and reporting cost reimbursement contracts.
		RESPONSE: We are considering it right now.
62	Section L.5.3.1 Relevant Experience Minimum Requirements	Will GSA consider allowing offerors to cite single or multiple award IDIQs or BPAs and describe task orders worked under those vehicles that demonstrate capabilities across the core disciplines and collectively exceed the dollar thresholds? This approach is similar to the one used for the Alliant proposals and demonstrates a strong IDIQ/BPA management capability.
		RESPONSE: No. We are focused on demonstrated experience in integrating core disciplines on single requirements.
63	Section M.5 Scoring System	Will GSA consider lowering the thresholds to receive points in the OASIS scoring system? Keeping the thresholds so high will reduce competition and constrain the number of highly qualified mid-tier companies that could otherwise prime on the OASIS Master contract and result in only very large firms receiving awards.
		RESPONSE: No. Lowering the point thresholds does absolutely nothing to change the Top rated Offerors. This is similar to giving points for minimum requirements, if everyone gets them, they are not worthwhile segregators.
64	Section L.3, Instructions; page 75	Section L.3 states, "GSA will consider affiliates, internal divisions, and subsidiaries of an Offeror, only if the Parent Company is the official legal bidding entity on the SF33. For example, ABC Enterprises submits a proposal for an OASIS contract. The proposal identifies relevant experience by ABC Company, a wholly-owned subsidiary of ABC Enterprises. This would be acceptable. However, if ABC Company, a wholly-owned subsidiary of ABC Enterprises submitted a proposal for an OASIS contract and identified relevant experience by ABC Enterprises, that would not be acceptable and the proposal would be rejected." This offeror requests the Government to refine this section to allow past performance and experience from all company affiliates, provided that a firm can demonstrate an organizational structure in which the personnel performing the highlighted work can and will be made available to perform under the OASIS contract...
		RESPONSE: We are currently editing this and will have an update posted shortly.