MEMORANDUM FOR BARRY S. WILSON
DIRECTOR
DEFENSE ACQUISITION REGULATIONS COUNCIL

FROM: RODNEY P. LANTIER
DIRECTOR
REGULATORY SECRETARIAT

SUBJECT: New Consolidated Form for Selection of Architect-Engineer Contractors

Attached are comments received on the subject FAR case published at 66 FR 53314; October 19, 2001.

Response Number	Date Received	Comment Date	Commenter
2000-608-1	10/19/01	10/19/01	Evelyn Clark
2000-608-2	10/23/01	10/23/01	Shannah Hayley
2000-608-3	10/23/01	10/23/01	Jeanette Leung
2000-608-4	10/26/01	10/26/01	Bill Cooke
2000-608-5	10/30/01	10/30/01	Art Wengert
2000-608-6	10/30/01	10/30/01	Doris Butler
2000-608-7	10/30/01	10/30/01	Harry Stiller
2000-608-8	11/05/01	11/05/01	Diana Duffy
2000-608-9	11/06/01	11/06/01	Lisa Haddox
2000-608-10	11/07/01	11/07/01	Kelly McClure
2000-608-11	11/08/01	11/08/01	Andy Schildt
2000-608-12	11/13/01	11/13/01	Roy Higa
2000-608-13	11/15/01	11/15/01	Roy Higa

Response Number	Date Received	Comment Date	Commenter
2000-608-14	11/15/01	11/15/01	Nora Ford
2000-608-15	11/15/01	11/15/01	Sue Pressley
2000-608-16	11/15/01	11/15/01	Carl Culhams
2000-608-17	11/16/01	11/16/01	William Holley
2000-608-18	11/19/01	11/19/01	Roy Higa
2000-608-19	11/21/01	11/21/01	Evelyn Clark
2000-608-20	11/21/01	11/21/01	E. Allen Taylor
2000-608-21	11/21/01	11/21/01	Azer Kehnemui
2000-608-22	11/16/01	11/26/01	Dave Gonzalez
2000-608-23	11/29/01	11/29/01	Valli Johnson
2000-608-24	12/04/01	12/04/01	Dave Pickering
2000-608-25	12/05/01	12/05/01	William Earl
2000-608-26	12/05/01	12/05/01	Clive Shearer
2000-608-27	12/10/01	12/10/01	Frank C. Gagliano
2000-608-28	12/10/01	12/10/01	Chris David
2000-608-29	12/11/01	12/11/01	Mel Chapman
2000-608-30	12/11/01	12/11/01	Sue Tang
2000-608-31	12/11/01	12/11/01	Elizabeth Davis
2000-608-32	12/12/01	12/12/01	Linda Rodgers
2000-608-33	12/13/01	12/13/01	David A. Jackson
2000-608-34	12/13/01	12/13/01	William Baker
2000-608-35	12/13/01	12/13/01	Michael Pavlides

Response Number	Date Received	Comment Date	Commenter
2000-608-36	12/14/01	12/13/01	McCluggage VanSickle & Perry
2000-608-37	12/14/01	12/14/01	John Palatiello
2000-608-38	12/14/01	12/14/01	Joseph Jacobazzi
2000-608-39	12/14/01	12/14/01	Rick Sauerwein
2000-608-40	12/14/01	12/14/01	Clarence Thomas
2000-608-41	12/15/01	12/15/01	Kenneth Forsyth
2000-608-42	12/17/01	12/14/01	PEC
2000-608-43	12/17/01	12/17/01	KayAnn Rutler
2000-608-44	12/17/01	12/17/01	Jean Herlihy
2000-608-45	12/18/01	12/18/01	Molly Maguire
2000-608-46	12/17/01	12/17/01	Ricardo Herring
2000-608-47	12/17/01	12/17/01	Jacquelyn Schingeck
2000-608-48	12/17/01	12/17/01	Robert Irwin
2000-608-49	12/18/01	12/18/01	Christina Bammann
2000-608-50	12/18/01	12/17/01	IT corporation
2000-608-51	12/18/01	12/17/01	URS
2000-608-52	12/18/01	12/16/01	Atkins Benham
2000-608-53	12/18/01	12/17/01	AEC
2000-608-54	12/18/01	12/17/01	Patricia Geary
2000-608-55	12/18/01	12/18/01	Reid Middleton, Inc.
200-608-56	12/18/01	12/18/01	CH2MHIll

Response Number	Date Received	Comment Date	Commenter
2000-608-57	12/18/01	12/18/01	Recon
2000-608-58	12/18/01	12/18/01	DOD/Navy
2000-608-59	12/18/01	12/18/01	Ricky Ward
2000-608-60	12/18/01	12/18/01	John Voycik
2000-608-61	12/18/01	12/18/01	Lisa Jenkins
2000-608-62	12/18/01	12/18/01	Patricia Caruso
2000-608-63	12/18/01	12/18/01	Marlin Denny
2000-608-64	12/18/01	12/18/01	Pam Ekey
2000-608-65	12/18/01	12/18/01	Sandra Fayette
2000-608-66	12/18/01	12/18/01	Lisa Jenkins
2000-608-67	12/18/01	12/18/01	Laura Templeton
2000-608-68	12/18/01	12/18/01	Pamela Jonas
2000-608-69	12/18/01	12/18/01	SAIC
200-608-70	12/18/01	12/26/01	CASNE Engineering, Inc.
2000-608-71	12/26/01	11/13/01	LAN, Inc.
2000-608-72	12/24/01	12/26/01	Pam Cushman
2000-608-73	12/26/01	12/21/01	Susan Stabler
2000-608-74	12/26/01	12/26/01	Carol Gibson
2000-608-75	12/28/01	12/28/01	Holly Kelty
2000-608-76	12/26/01	12/26/01	Willy Van Hemert
2000-608-77	01/02/02	01/02/02	Irwin Thomas
2000-608-78	01/07/02	01/04/02	ACSM

Response Number	Date Received	Comment Date	Commenter
2000-608-79	01/04/02	01/04/02	Pam Ekey, CPSM
2000-608-80	01/04/02	01/04/02	Evie Clark
2000-608-81	01/04/02	01/04/02	Brook Mayfield,
2000-608-62	01/08/02	No Date	ACEC
2000-608-83	01/08/02	01/08/02	Department of State
2000-608-84	01/08/02	01/08/02	The AIA
2000-608-85	01/08/02	01/08/02	Nira Ratnathicam
2000-608-86	01/08/02	01/08/02	Jeanette Leung
2000-608-87	01/08/02	01/02/02	Eileen Hughes
2000-608-88	01/08/02	01/08/02	Scott Young
2000-608-89	01/08/02	01/08/02	Bill Boutin
2000-608-90	01/08/02	01/08/02	Camille Flennor
2000-608-91	01/08/02	01/08/02	Jodi Heiser
2000-608-92	01/08/02	01/08/02	Kara Fraser
2000-608-93	01/07/2	01/09/02	Baker Engineering and Energy
2000-608-94 -A	01/07/2002	01/07/2002	Brookhaven National Laboratory
2000-608-95-B	01/08/02	01/08/02	Design Professional Coalition

Attachments

cc: MVP OFFICIAL FILE: READING: C.Davis: DARC
CC: Ceceila Davis/lme/01/10/02/h/regovers/industry/2000-608.doc

2000-608-1

"Clark, Evie" <CLARK@alaska.coffman.com>

10/19/2001 05:37 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: FAR Case 2000-608

Proposed rules for new SF 330 do not show a suggested or target implementation date...

If changes are approved after the comment period ends... when might the new form be implemented???

If unknown... can you at least provide a minimum period required prior to implementation?

* This is a MAJOR change for architects and engineers... collecting data on twenty years of projects will take some time.
* Recoding all our projects to accommodate new Profile Codes will take a LOT of time.
* Interviewing our staff members to find out years of completion for every project will take a great deal of time... especially when they are busy with billable work.
* For those of us who are primarily SUBconsultants providing multiple disciplines, each submission will take extra time if we are providing different disciplines to different prime consultants.

Any idea on timing would be GREATLY appreciated!

ALSO: The background information states that the updated form is "organized in data blocks that readily support automation". Can you tell me what software this form was created in? It appears to be an Excel-type spreadsheet... which is NOT a database. It does not easily accept fields from a true database. It's sorting capabilities are very limited.

Evelyn P. Clark, CCA
Coffman Engineers, Inc.
800 F Street
Anchorage, Alaska 99501
907/257-9242 Direct
907/276-6664 Main
907/276-5042 Fax
clark@alaska.coffman.com
www.coffman.com

2000-608-2

"Shannah Hayley"
<Shayley@urbandesig
ngroup.com>

10/23/2001 02:27 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: FAR case 2000-608

Please make some statement regarding acceptability/unacceptability of electronic signatures on Form 330.

Shannah Hayley
Marketing
Urban Design Group
15950 North Dallas Parkway, Suite 325
Dallas, Texas 75248
972-788-9242 voice
972-788-9234 fax
www.urbandesigngroup.com

2000-608-3

"Jeanette Y Leung" <LeungJY@stvinc.com>

10/23/2001 04:38 PM

To: farcase.2000-608@gsa.gov
cc: "Linda Rosenberg" <Linda_Rosenberg/STV@stvinc.com>, "Nadine Roper" <Nadine_Roper/STV@stvinc.com>
Subject: FAR Case 2000-608

October 23, 2001

General Services Administration, FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
Washington, DC 20405

Attention: Ms. Laurie Duarte

Reference: FAR Case 2000-608

Dear Ms. Duarte,

Due to a recent amendment of the Federal Acquisition Regulation (FAR) in the replacement of SF 254 and SF 255 with SF 330, STV Incorporated (STV) would like to provide comments to be considered in the formulation of a final ruling. Since STV is unable to access the amended forms via internet, we are requesting a copy of the newly consolidated forms. In order to provide you with an effective response, please forward me a copy of the forms to the email address listed below. If you should have any questions, please contact me.

Thank you.

Sincerely,

Jeanette Leung
Marketing Department
STV Incorporated
225 Park Avenue South, 5th Floor
New York, NY 10003
Phone: (212) 614-3397
Fax: (212) 673-5533
Email: leungjy@stvinc.com

2000-608-4

"Enlightened Software (sales)" <sales@enlightenedsoftware.com>

10/26/2001 02:27 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: Modifications to Standard Form 330

Hi

We are the producers of a software package called "Government Forms Software" that is used by approximately 5000 different A-E firms and individuals around the country and the world. Its primary purpose is to aid in the electronic creation of the SF 254 and 255's and we are looking forward to the release of the new Standard Form 330.

That said, and upon review of the draft copy released in the Federal Register dated October 19, 2001, we have the following suggestions for modifications to the form that could make the process easier for both those whom are filling out the form, and the agency that will be reviewing them:

>> Page 8 Section C <<
Replace the multiple "X" entry fields with one field that would allow the those filling the form to choose between "P", "JV", or "Sub". This would eliminate 18 redundant fields, vertically printed text (which some printers simply can not reproduce), and present a more familiar inqurirry based on the SF 254 Item 11 (the form in which this new form is replacing).

>> General Modifications <<
All locations on the form that present a check box and ask if a photograph is attached should provide a page addendum that has a similar appearance to other pages within the form. If needed, I can submit a draft of a new page(s) that would fit nicely into this new forms scheme and provide the needed space and reference to the appropriate project.

Please let me know how these suggestions are taken. Thanks...

Bill Cooke
ENLIGHTENED SOFTWARE, INC
Email: sales@enlightenedsoftware.com
Web: http://www.enlightenedsoftware.com
Phone: (407) 331-0032
Fax: (509) 753-4386

2000-608-5

"Art Wengert"
<awengert@pwt.com>

10/30/2001 11:39 AM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: SF 330 Draft Review

Ms. Laurie Duarte
General Services Administration
FAR Secretariat
1800 F Street, NW
Room 4035
Washington, DC 20405

Subject: SF 330 Draft Review
FAR Case 2000-608

Ms. Duarte,

Please let me know if the final SF 330 will be available in electronic format for ease of contractor editing. The downloaded file is in Adobe Acrobat, but does not appear to be edit friendly. What software will be the final SF 330 be created in ?

Thank you,

Art Wengert
Pacific Western Technologies, Ltd.

2000-608-6

"Doris Butler"
<doris@zeckbutler.com>
10/30/2001 12:06 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: Comments on FAR case 2000-608

I would like to offer three comments on the "Proposed Rule-New Consolidated Form for Selection of A-E Contractors."

1. Changing Profile Codes to a letter and number combination seems unnecessary. The codes work now just fine without changing them and adding the initial. Changing all of them in our database will be time consuming and does not add to the efficiency of the form.

2. Instructions under 36, "Example Projects Listed in Section F" for using the number "2" are confusing - what do you mean by "same or similar role?"

3. In general, the combined form is excellent and a great improvement over the separate forms and is very much simplified and will shorten our preparation time.

Thank you.

DorisButler, Administrative Assistant

ZeckButlerArchitects, PS

Spokane, Washington

2000-608-7

HasImages@aol.com
10/30/2001 04:06 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR Case 2000-608

HAS Images, Inc. is a specialty photographic laboratory that processes aerial film and provides photographic products in support of Architec & Engineering contractors. With the posibility of updating the SF254 to the SF330 I recommend "Section C."Proposed Team" on page 8, include a Vendor catagory.

Our function on the contracts is that of a Vendor, not a Sub-Contractor or Joint Venture Partner, because the products and services required are the same as those we produce for more than 300 customers worldwide and are listed in a published price list. Our customers are private mapping firms, academia, and federal organizations like NOAA, USGS, U.S. Forest Service, U.S. Fish and Wildlofe Service, and the Bureau of Land Management.

A Vendor would list their capabilities and references instead of Architect-Engineer Qualifications.

If you have any questions or need additional information, please contact me.

Harry A. Stiller
HAS Images, Inc.
136 N. St.Clair Street, Suite 300
Dayton, OH 45402

Phone 937 222-3856
FAX 937 222-2443
Email hasimages@aol.com

2000-608-8

"Diana Duffy"
<dduffy@hmmh.com>
11/05/2001 02:58 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: SF330 Feedback:

Greetings from HMMH:
Thank you for letting users of the SF254 & SF 255 make comments on the new SF330 form! We look forward to the new format that allows for one-stop-shopping of A&E Contractors.

Elements of the new form we like:

- the vertical format!
- clearly defined limits for those sections where additional information is to be provided only if required.

After completing a SF 254 or 255, we often wonder if anyone will actually read our company information. Both are detailed and uninviting, but informative and brief. This new form will offer more information, but at the expense of being an even greater challenge to read and understand. Elements of the new form that concern us are:

- Section E, #23 under Relevant Projects, *(3) Year Completed* is unclear. Do you want applicants to put a number next to *Year Completed,* or fill in the year completed for both/either *Professional Services* or *Construction*?
- Will you offer any template for the organizational chart page? I understand you can not specify organizational chart lay-outs, but perhaps a placeholder page with corresponding headers and footers will be helpful.
- The present layout of the form is cramped and difficult to read - and this is a blank form. A number blocks on this new form seem too small for the information requested to be placed in them. The last page - **qualifications** - is the most challenging. The form could improve with a new design focus on clarity.

This feedback will hopefully help you in making the new SF 330 a very slick application. Thank you again for reading our comments. We look forward to working with a new form in the future.

Sincerely,

Diana Duffy
HMMH Marketing Coordinator

2000-608-9

Lisa_Haddox@nps.go v

11/06/2001 12:07 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: Comments on SF330

Thanks for the opportunity to comment on the Draft SF330.

1. The forms still seem geared toward professional practice, rather than addressing the Design/Build option. Perhaps some additional Profile Codes need to be added to Part II.

2. The Part I form would seem to favor a/e's who use the same personnel and same subcontractors on the example projects. Perhaps this is what qualifications-based selection is all about?

2000-608-10

"McClure, Kelly" <McClure@stsconsultants.com>

11/07/2001 05:26 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: FAR case 2000-608

To whom it may concern:

We have the following questions/comments in reference to FAR case 2000-608:

1. When do you expect SF 330 to replace SF 254 and SF 255?
2. Our company heard that the intention is to make this a paperless production. Is this true, and if so, is the intended transmission email, the internet or a CD-ROM?

3. Will electronic transmission be required?
4. If electronic transmission is the idea, will an electronic or scanned signature be acceptable?
5. Will there be a software company who will create the forms?
6. Will the size of the blocks be expandable for detailed information? (especially in the project and experience sections)

Thank you,
Kelly McClure

Kelly McClure
Regional Marketing Coordinator
STS Consultants, Ltd.
750 Corporate Woods Parkway
Vernon Hills, Illinois 60061
847.279.2426 (Phone)
847.279.2510 (Fax)
mcclure@stsconsultants.com

2000-608-11

Andy Schildt
3325 Cothrin Ranch Road
Shingle Springs, CA 95682
(916) 933-4619

8 November 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street NW, room 4035
ATTN: Laurie Duarte,
Washington, DC. 20405

Subject: FAR Case 2000-608

My background:
For over 15 years, I was involved in the review of thousands of SF 254s and SF255s and the selection process of AE firms for the US Army Corps of Engineers. Since my retirement, I have assisted AE firms [LB, SB, SDBs, 8(a)s] in responding to CBD announcements to Air Force, Navy, Army, VA, USBR, and Dept. of the Interior projects.

Below are some comments for your consideration for the new SF 330 as drafted by the interagency ad hoc committee.

A. General Comments:

1. I applaud the new SF 330 form developed by the committee.

2. Some blocks are too small to insert data. Specific comments below.

3. Some verbiage needed if the form can be "modified" slightly to have extra space to insert data.

4. The 29 hours listed to prepare the Part I and Part II appear too low. It takes many hours of phone calls by the prime with the consultants to obtain proper applicable information, rewriting their narratives into the format of the prime, obtaining performance appraisals and letters of commendations. Not including the independent review by an outside individual, more than 40 man-hours are at least spent by an average sized AE firm for an average sized ($5M - $10M) project.

5. Discuss if this new form can be completely submitted via electronic means or if hard copies will still /should be required. Keep in mind that Part I, Block 39 and Part II, Block 12a require original signatures.

B. Specific Comments

1. Par D. Request for comments Regarding Paperwork Burden: I suggest not collecting information how long it takes to fill out these forms. Many of the individuals doing this in an AE firm are relatively new or have never filled out such a form and so it take

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much longer. Also there have been very few design projects that have been advertised in the CBD in the past 5 years. Most designs are currently being done by design/build contracts or existing IDIQ design contracts.

2. Page 1, Individual Agency Instructions: I suggest to discourage the number of pages submitted. Firms will spend many hours to decide what or what not to submit, what font size. I suggest just keeping the page count reasonable.

3. Page 1, Specific Instructions, Part I Contract Specific Qualification:

   a. Suggest adding the word "Block" before each of the numbers listed.

   b. Provide a block on the Part I form listing the name of the AE firm.

   c. Block 5: Suggest to list the hard copy of the CBD announcement as the official public date—which is what the Navy uses on the West Coast. Most firms do not look at FedBizOpps or the CBDNet. Most announcements still say to submit 30 CD "after the announcement"; clarify which announcement.

   d. Delete "if applicable". Every agency's announcement has a solicitation number.

4. Page 2 Section C. Proposed Team: Indicate that the selection will also consider the amount of DOD fees a firm has collected in the past year(s). If an office lists various branch offices that will be used in the proposed design effort, the Government may consider the performance ratings from those offices, but also the amount of DOD fees collected by those branch offices.

5. Page 2, Section E, Resumes of Key Personnel:

   a. Block 16: Suggest not only to state the role in this contract but also the responsibility and authority. This is especially important for the Project/Program Managers.

   b. Block 23: The blocks 4 and 5 referred to in this paragraph are too small for large, unique project. Enlarge the blocks.

6. Page 2, Section F, Example Projects:

   a. Block 25: Cities are sometimes listed in the CBD. Most of the time, it is the name of a Government facility. Add "Name of Installation".

   b. Block 28:

      1) Block is too small for information to be provided.
      2) Also add relevant project scope, size and $$value.

   c. Block 29 & 30: Most recent CBD announcements include a statement to provide "AE Services during Construction" like shop drawing reviews, change order designs.

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7. Page 3, Block 32 and 33: Blocks are too small to put in meaningful data.

8. Page 3, Block 37:
   a. Suggest to list projects in the order of importance, not in the same order as they appear in Section F.

   b. Suggest adding the page number of the applicable project in Section F.

9. Page 4, Part II General Qualifications:
   a. Block 2a –2f and Block 7: Both blocks say "branch office". Clarify.

   b. Block 10:
      1) Clarify the appropriate revenue index number.

Example: If a firm had an income of $30M for specialized projects for 3 years only, the average for 3 years is $10M which is an index of 7. The five-year average however is $6M that relates to an index of 8.

      2) Clarify to the AE firms why this information is needed.

   c. Block 11: Clarify why this information is needed.

10. Page 5, List of Disciplines:
    a. Suggest to add the following:
    -Archeologist
    -Lighting Engineer
    -Sanitary Engineer
    -Railroad Engineer
    -Materials Handling Engineer
    -Community Relations Specialist

    b. Modify the following:
    -#18 Cost Estimator is generally not an engineer; they are mainly "certified".
    -#16 Communications / **Computer**
    -#19 Suggest to separate Electrical Engineer and Electronic Engineer
    -#47 Add **Program Manager** to Project Engineer

11. Page 6, List of Experience Categories: Suggest the following
    a. #F01 Blast Resistant Design is part of SO9.
    b. Add a category for EMCS and SCADA
    c. #S02 Security System. Smoke Detection should be part of fire protection. Firemen will tell you, where there is smoke, there is fire!

12. Page 8 Block C Proposed Team:
    a. Block 13: Suggest to add the phone number.

    b. Block 14: Need more space.

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c. Consider to add a block 14A: "Prior Contract Relationship": Y/N even though it is listed further on in Block F. It is too much flipping pages back and forth.

d. Block 4: Add "Installation". Generally federal installations are not addressed by city.

13. Page 10,

a. Block 25: Add "Installation" name.

b. Block 28: Add cost, size and scope to this block. Increase block size.

2000-608-12

"Higa, Roy T POD"
<Roy.T.Higa@pod01.usace.army.mil>
11/13/2001 02:04 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: FW: FAR case 2000-608

Our comments are attached.

<<POA COMMENTS.doc>>

- POA COMMENTS.doc

608-12

POA
COMMENTS
Consolidated Form for Selection of Architect-Engineer Contractors

Brian West, Section A Environmental Engineering Supervisor

It appears that the form will limit the ability of a firm to provide detail for the example projects and for a persons resume. It is already difficult in most cases to distinguish between firms and limiting the amount of detail that they can provide will make it impossible to do so.

Laura Walker, Chief Technical Engineering

Would like to see check mark on "C. Proposed team" to see if they have worked together before.

I would like to see a few more relevant projects under section E. for the employees (8-10 projects). For an IDIQ we are looking for a lot of depth and diversity of experience. The box looks estremely small for "4) Description (Brief scope, size, cost, etc.)"

Section H. Additional information. Suggest adding "Sustainable Design".

Many of the fonts look awfully small, this will be very tiring for the selection committee to wade through the books.

June Wohlbach, Contract Specialist

1. Overall:

a. Too congested. Not enough white space around various blocks to allow important information to stand out.

b. The boxes are too small. Difficult to include enough information.

c. More difficult for the prime firms to complete the form. They are required to compile information from the subcontractors, particularly in sections F and G. The new form should be easier to complete.

d. Prefer the current SF255's ability to stand alone for either a prime or a subcontractor. Agencies may request a separate SF255 for the prime and each subcontractor proposed. This reduces the impact to the primes in preparing the submittal, and clearly separates each firm's experience and resumes for the Government reviewers.

2. Part I

a. Section B: Add block to identify the POC's firm name.

b. Section C: Add block to identify the social/economic status of each firm: large business, small business, small disadvantaged business, woman-owned business, veteran-owned business, and HUB-zone business

c. Section F: Appears to concentrate on team experience. Caution! This has been used on source selections on construction projects and led to less competition particularly in areas where competition is already limited (i.e., Alaska). The same firms teamed together every time, reducing the pool of experienced firms. Also, if a prime selects a new firm to join the team, there is a potential that the new firm's experience may not be provided due to not enough project examples allowed (less than 10).

d. Section G, block 36: Add "as proposed for this contract" to the instructions to the last sentence. This is already reflected in the instructions on page 3 and provides clarification.

e. Section G, block 36 and 37: Provide form with the reference number blocks blanked out. This allows the firm to easily provide a continuation page if the agency requested more than 10 projects on section F.

3. Part II

a. Block 2a: Add check box to indicate that this is submitted for a branch office only. Not clear if the firm simply enters the firm's branch office name. Could be the same as the primary office name.

b. Block 4: Add 4a. for CAGE code.

c. Block 5b: Change title to "Social/Economic Status" and add check boxes for: LB, SB, SDB, WOB, VOB, HUB. This eliminates the uncertainty whether the firm missed the box or is a large business.

d. Block 12c: Delete "of Authorized." Eliminating this makes it identical to Part I, Section H.

David Piening, Engineer Contract Services Team

Section G: Key personnel participation in example projects. A "1" signifies an individual's participation in any role on an example project. This information is insignificant. Without knowing the individual's actual role in a project, why present the information at all. It leaves the reviewer in the position to determine the individual's level of participation on a project. Not sure whether this information will actually help in selection. Additionally, reviewers will have interpret the information and not just rate/rank it.

Will/can section H be limited in length?

Section F, block 33: Not sure if we ever will request specific data for example projects other than what is listed in the remainder of section F. Others may have an idea of how this block is to be used.

2000-608-13

"Higa, Roy T POD"
<Roy.T.Higa@pod01.usace.army.mil>

11/15/2001 01:47 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: RE: FAR case 2000-608

The following comment is submitted:

Block 23. Relevant Projects -- it would be extremely helpful to request an "agency" or "business" Point of Contract (POC) with an accompanying Phone Number so the government verify Past Performance. I realize this information could be requested for SECTION H, but I believe most government agencies would find this information useful so recommend including another section in Block 23 to capture this "routine" data.

2000-608-14

November 15, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
Washington, DC 20405
E-Mail: farcase.2000-608@gsa.gov

Attention: Laurie Duarte

Dear Committee Members:

This fax is in response to notification of the proposed amendment to exchange your SF 330 for the SF 254/255 Architectural-Engineering and Related Services Questionnaire. Our firm would like to provide the following comments to be considered in your decision of whether to keep the current SF 245/255 or change to the new SF 330.

Rodney P. Kinney Associates is a small M/DBE engineering firm in Eagle River, Alaska. There are thousands of firms like ours across the country that have spent thousands of dollars buying and developing information systems that specifically respond to your current SF 254/255. In addition, all of these firms have paid to train personnel to understand and work with the current SF 254/255. It is costly to throw out this current system and develop a new system that will put the firm's qualifications information into a new SF 330 format. In the long run, it will take our marketing department as much time to produce the new SF 330 even when our systems have been redeveloped to fit this new form.

Will this move save large amounts of time and money? Will it be such an enormous benefit to the government that it will offset the added financial burden to companies? Would the costs borne by both the companies and the government to implement this change be worth it to either or both parties? Since the country is in a recession, we believe that the government should keep the same SF 245/255 forms.

Part I (Which takes the place of the SF 255)

Space for information in the SF 330 is very limited throughout and does not allow for much of the information clients have requested in the past. Examples include:

1. Title of Project (Clients in the past have project names that would never fit into this space).

2000-608-14

2. Resume. 22 Other is not nearly enough space to put additional degrees, state registrations and organizations. Some staff members have 10 to 15 state registrations alone.

3. Under relevant projects for resumes, 14 Project Descriptions, space needs to be larger. In our case, we do civil including, roads, drainage, grading, water and sewer, slope protection i.e., geotechnical investigation, soil and material testing, surveying, environmental impact studies, foundation design, hydrology studies, AutoCAD drafting and construction inspection for most of our projects. This would not begin to fit into the space provided unless typeface was so small you could hardly read it. Clients normally want to hear how the project we are using relates to the project we are proposing on.

4. No space is provided to demonstrate that we are a M/DBE qualified firm.

Part II (Which takes the place of the SF 254) comments.

Most civil engineers serve as both civil and geotechnical engineers. Alaska, Washington, Montana, Idaho, Oregon, Wyoming, Colorado, Nevada, and New Mexico do not have separate registrations for geotechnical engineers. You have indicated in your instructions that one person cannot be listed for two different functions as stated in parg. 9 of 53319 of your draft (Standard Form 330, Page 4.) Our firm has 4 registered professional engineers that serve as both the civil and geotechnical engineers. They have spent 20 years working in both capacities for our clients. Most of the projects our firm works on contains both civil and geotechnical services. To not allow firms like ours to count staff under both categories would hinder our abilities to sell both services to our clients. Most of the small firms through the US are in the same situation.

Under number 11 you do not allow space for year. How will you correlate dollars and years?

We appreciate your consideration of our comments.

Sincerely.
RODNEY P. KINNEY ASSOCIATES, Inc.

Nora Ford,
Director of Business Development
Rodney P. Kinney Associates, Inc.
16515 Centerfield Drive, Suite 101
Eagle River, Alaska 99577
FAX 907-694-1807
E-Mail: PNFord1749@aol.com
Phone: 907-694-2332

2000-608-15

"Sue Pressley"
<SuePressley@pdceng.com>

11/15/2001 06:48 PM

To: '"farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: New SF330

Dear Ms. Duarte:

I am a member of the A/E Community and feel strongly about the time that has been allowed for review and comments of the new SF330 Form. I belong to several organizations who feel just as strongly as I do and at this time I would like to make a recommendation that the date for receipt of comments be set for mid-January rather than December 18, 2001. This puts us in a very awkward time of the year with the Holiday season upon us.

Please consider this request and any others that you may receive.

Thank you and have a Happy Thanksgiving!

Sue Pressley
Marketing Coordinator
(visit our website @ www.pdceng.com)

2000-608-16

"The Culhams"
<culham@teleport.com>

11/15/2001 09:54 PM

To: farcase.2000-608@gsa.gov
cc: cculham@fs.fed.us
Subject: Fw: FAR Case 2000-608

----- Original Message -----
From: The Culhams
To: farcase.2000-608@gsa.gov
Cc: cculham@fs.fed.us
Sent: Tuesday, November 13, 2001 7:18 PM
Subject: FAR Case 2000-608

FAR Case 2000-608

These comments are made regarding the proposed final rule to consolidate Standard Forms 254/255 into Standard Form 303.

1. Part II, Block 5 of Standard Form (SF) 303

Part II Block 5 of the proposed SF-303 is to be completed with information regarding ownership of the Architectural-Engineering (A-E) firm. Instructions for the SF-303 stipulate that Block 5.b. is to be completed by indicating if the firm providing the completed form is a small business pursuant to the North American Industry Classification System (NAICS) and Federal Acquisition Regulation (FAR) Part 19. Providing only information regarding small business status is not adequate. The form should stipulate a more concise indication of an A-E firm's business size status.

Socio-economic programs of the FAR require that certain procurements must give consideration to business status such as, but not limited to, 8(a), Emerging Small Business, Small Business, Women Owned, HUBZone and Small Disadvantaged Business. These considerations are applicable to A-E and related procurements. Pursuant to the FAR requirements to consider socio-economic status A-E Qualification screening must include business size status. In most cases this screening is one of the first considerations for review of A-E qualifications. Example - Emerging small businesses must be considered first in A-E procurements under $25,000.

The proposed SF-303 does not provide adequate information to accommodate this business status screening and will require acquisition personnel, especially when using the short selection process allowed for pursuant to FAR Subpart 36, take additional steps to determine and confirm the size status of a business during the screening process. To avoid this burdensome step Block 5 should be designed to allow a firm to check its appropriate size status much in the same manner that the current Standard Form 254 allows. Additionally, more blocks should be added to allow a firm to indicate

2000-608-16

status relating Emerging Small Business, Women Owned Business, HUBZone and Small Disadvantaged Business.

The instructions for the SF-303 should be changed appropriately to discuss appropriate completion of the block format. An additional comment regarding the instructions is provided below.

2. Instructions for Completion of Part II, Block 5 of SF-303.

Generally the instructions provide adequate information and references to accommodate a firms research and proper indication of business size status. This is true in consideration of the change proposed in Number 1 above as well.

However, as the U.S. Small Business Administration is charged with the effort to assist businesses in determining their proper business status the instructions for Block 5. b. found on page 4 of the draft of the proposed SF-303 should be changed as follows.

The last sentence should be deleted and replaced with a sentence that essentially reads as follows: "Contact your local U.S. Small Business Administration office for any questions regarding Business Status."

Thank you for considering these proposed changes to the proposed SF-303.

/s/Carl R. Culham, CACM

1255 S.W. Blaine Court

Gresham, OR 97080

503.665.9533

culham@teleport.com

2000-608-11

"William Holley" <wtholley@pop200.gsfc.nasa.gov>

11/16/2001 12:34 PM
Please respond to wtholley

To: farcase.2000-608@gsa.gov
cc:
Subject: Comment on FAR Case 2000-608

Comment on 2000-608 New SF 330

In order to make architect engineer evaluations consistent on design-build contracts, I recommend you amend the Subpart 36.303-1.a.2.ii, by adding a paragraph (D) as follows: "Technical qualifications of architect-engineer members are to be submitted and evaluated using form SF 330."

Subpart 36.3- Two-Phase Design-Build Selection Procedures

36.303-1 Phase One.

(a) Phase One of the solicitation(s) shall include-
(1) The scope of work;
(2) The phase-one evaluation factors, including-
(i) Technical approach (but not detailed design or technical information);
(ii) Technical qualifications, such as-
(A) Specialized experience and technical competence;
(B) Capability to perform;
(C) Past performance of the offeror's team (including the architect-engineer and construction members); and
(D) Technical qualifications of architect-engineer members are to be submitted and evaluated using form SF 330.
(iii) Other appropriate factors (excluding cost or price related factors, which are not permitted in Phase One);

Sincerely,

William Holley, P.E.
Mail Stop 224
GSFC
Greenbelt, MD 20771
301-286-5901

- winmail.dat

2000-608-18

"Higa, Roy T POD"
<Roy.T.Higa@pod01.usace.army.mil>

11/19/2001 02:40 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: FW: Proposed Rule - FAR - New Consolidated Form for Selection of Architect-Engineer Contractors

Additional comments:

1. Overall this streamlined and condensed version should make evaluating A-E qualifications and experiences easier.

2. Suggest that we also solicit an alternate POC to include their phone number, e-mail address, etc., for part I section B.

3. Suggest that we include a column for "Worked w/ Prime before? Yes/No" for part I section C. There may be instances other than the projects in section F that the prime worked with the sub.

4. I think the form should be made available in a format whereby the A-E can input info directly into the form, and block sizes automatically increasing when needed.

2000-608-19

"Clark, Evie" <CLARK@alaska.coffman.com>

11/21/2001 01:22 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: Proposed SF330

I would like to add to the request for extending the comment period on the Proposed SF330.

These changes are EXTENSIVE... and changing databases will be VERY costly for architectural and engineering firms across the country.

I have already compiled 3-1/2 pages of comments, questions and suggestions... and STILL keep finding more every time I look at the package!

Thank you for consideration of this request.

Evelyn P. Clark, CCA
Coffman Engineers, Inc.
800 F Street
Anchorage, Alaska 99501
907/257-9242 Direct
907/276-6664 Main
907/276-5042 Fax
clark@alaska.coffman.com
www.coffman.com

2000-608-20

"Allen Taylor"
<ataylor@mcrpdesign
.com>

11/21/2001 11:42 AM
Please respond to
ataylor

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR case 2000-608

Gentlemen:
In review of your Proposed SF 330/Draft to replace SF 245/255 I submit the following suggestion for your review:

Revise the title of form(s) and references from Architect - Engineer Qualifications to Architecural - Engineering Qualifications. I sounds clumsy to reference singular and plural expressions within the same title and may be ungrammatical. Although I am not an expert nor have I researched the titles grammatical accuracy, it may occur to you to do so.

Thank you.

E. Allen Taylor III, AIA/Principal
MATEU CARREÑO RIZO & PARTNERS
Two Landmark Center
225 E. Robinson Street, Suite 225
Orlando, FL 32801
T: 407.426.1288
F: 407.426.8607
e: ataylor@mcrpdesign.com

2000-608-21

"Azer Kehnemui" <Azerk@skaengineers.com>

11/21/2001 03:55 PM

To: '"farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: FW: Proposed Form SF330

> My comments related to the draft of SF330, dated 10/19/01
>
> 1. Under List of Experience Categories (Profile Codes), Code F01 Fallout
> Shelters; Blast-Resistant Design,It would be more appropriate to have two
> separate profile codes: F01 Fallout Shelters and B03 (or B02)
> Blast-Resistant Design.
> What with the existence of the current Interagency Security Design
> requirements for Federal Facilities, blast-resistant design is applicable
> to most federally-owned or occupied buildings, though these buildings are
> not necessarily fallout shelters. In addition the term "fallout shelter"
> means something quite different than a blast-shelter or blast-resistant
> building.
>
> 2. Under List of Experience Categories (Profile Codes), a category of
> "Embassies and Chanceries" would be appropriate, even though SF330 may not
> be applicable to State Dept.-related projects.
>
> 3. Again, under List of Experience Categories (Profile Codes), a category
> of "Mixed-Use Building Complexes", commonly used in commercial
> construction, could also be helpful. This would normally imply a
> large-size project, and a mixture of commercial office, residential,
> parking and retail construction.
>
>
>
>
>
>

> Azer Kehnemui [Azer Kehnemui] , D.Sc., P.E.
> Principal
>
> SK&A
> Smislova, Kehnemui & Associates
> 1709 N Street, N.W.
> Washington, D.C. 20036
> Tel. 202-659-2520
> Fax. 202-659-1097
> Email: azerk@skaengineers.com
>

2000-608-22

"Gonzalez, David A NAO02" <David.A.Gonzalez@NAO02.USACE.ARMY.MIL>

11/26/2001 09:40 AM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: Comments on FAR Case 2000-608

Dear GSA Representative,
Please forward these comments to the appropriate office/person.

I have served on an AE selection board. It takes a long time to read through the general and specific qualifications to extract the information needed to be able to compare one company to another to determine which are qualified to do the work as well as rank them.

It doesn't matter if you use two forms SF254/SF255 or one form SF330 with two parts. That's an administrative detail. What's important is that the board members can easily find the relevant information to compare the companies point by point from the forms in front of them. So a standard presentation (format) is desired to ease comparison. Some firms don't use the standard forms, but rather provide their info on high quality binders (after all, quality of the submitted forms is an example of the quality of their work) including high quality paper, use of color, etc.

I believe that your goal of formatting such that it is easy to key into a database is not worthwhile. The board members are not going to key the data into any database nor is it likely that anyone else will enter the data from the forms into a database and then extract it back out of the database and provide it to the board. The selection board will use the forms mailed to them by the AE's under a specific CBD announcement, not a database (ACASS included if it does not contain info on the companies under consideration) in the selection process.

(p9 #23). The SF 330 appears not to allow sufficient space for individuals to provide text describing their previous jobs. Most of the subjective assessment is taken from the textual descriptions of work that they have done.

(p10 # 26/27) What's the point of requiring the reference (project owner)? Keep the AE honest? It's not like the selection board is going to contact all of the numerous project owners listed or any of the project owners to ask how the AE did during the board process.

(p10 #28) SF330 appears not to allow sufficient space for AE's to provide text describing their previous jobs.

The SF 330 Section G (p11) appears not to allow one person to have had multiple roles in the same contract (i.e. it does not account for differing roles per task order within a base contract, e.g. project manager in one task order, architect in another)

It appears to allow only one function per person and doesn't appear to allow qualification of level (e.g. junior vs. senior electrical engineer)

Otherwise, seems like the same info has been requested.

Best of luck,
-Dave Gonzalez
(757) 441-7521

608-22

Background:
I received a printed document titled Federal Register/Vol 66, No 203/ Friday Oct 19th 2001/ Proposed Rules; Part III, DOD, GSA, NASA; 48 CFR Parts 1, 36 and 53, Federal Acquisition Regulation; New consolidated Form for Selection of Architect-Engineer Contractors; Proposed Rule.

It said I could provide comments over internet to "farcase.2000-608@gsa.gov". I was redirected to the GSA home page and from there didn't know where to go to provide my comments. Keyword search resulted in "**Undefined Error**

Undefined Error extracting file! */data/WWW/ARNet/discuspro_admin/secure/1/1.html* could not be opened!

$!: **No such file or directory**

Please contact webmaster <mailto:steve.welch@gsa.gov> if this problem persists. "

Top of Form 1

2000-608-23

"Valli Johnsen"
<vjohnsen@floridaarchitects.com>
11/29/2001 03:41 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: FAR Case 2000-608 comments

November 29, 2001

General Services Administration
Washington D. C.

RE: FAR Case #2000-608

To Whom It May Concern:

I have been responsible for creating, maintaining and submitting 254/255 forms on behalf of architectural firms for over 13 years, and was glad to see that there is interest to streamline the process. Please realize that most Public Agencies require a 254 and/or 255 in their RFP's, and will probably follow the 330 as well. You are setting the standard for most public agencies including school boards, colleges, cities, etc. etc. etc.

Given that we will have to work with whatever you develop for a long, long time and for almost every submittal we prepare, I feel it's in my best interest to submit my comments.

1. Part I, Sections A, B, C, D (page 8) Combines 254 Page 1 and 255 Page 6 and includes box to check if organizational chart is attached as separate page.

It appears as though an organizational chart is required as a separate sheet. Personally, I feel that an A/E organizational chart for itself and consultants is an additional page stating the obvious, usual and customary organization of managing a project, unless unique or unusual situations apply. I can't think of a project where we were not directly responsible to the Owner or Owner's Rep, or where we didn't manage our own consultants, or work laterally with CM's or Contractors.

Otherwise, is a simple page to complete.

2. Part I, Section E (page 9) Combines 255 Section 7, and Section 8 as it applies to the individual's experience.

#15 - #22: Same info as 255, Section 7.

#23: becomes redundant, cumbersome and time consuming since the information is also required in other sections of the form. Will end up taking a lot of time to edit to be consistent with the other sections and each time the relevant projects have to change for each new submittal.

Suggest limit #23 to be matrix corresponding to the relevant project# included in Part I, Section F.

Also, #23 does not ask what FIRM the individual was with when performing the work, therefore, all work included in this section would be assumed to have been performed by the submitting firm.

If it is a project that was performed by the individual while with another firm, perhaps additional project sheets for individual experience can be added to Part I, Section F - since we usually do that anyway.

If these suggestions are taken, would be room on each page for 2 resumes, reducing the submittal bulk.

608-23

3. Part I, Section F - replaces 255, Section 8

#28: Should include the photo(s) of the project, rather than submitted as a separate page - which would require more time and editing to correspond to the correct project and contribute to more bulk of the submittal. If suggestion for #31 is incorporated, then there would be more room on this page for the photos and additional information considered important for the selection committee to see.

Also, suggest limiting the project information to ONE page per project.

#31 will become cumbersome and time consuming to edit for consistency for each submittal, as teams change with project relevance.

Suggest including a matrix indicating the # or letter of the corresponding consultant in Section C.

This page should ask the role and/or responsibilities of the submitting firm - similar to the 254 - "P", "IE", "C", "JV".

4. Part I, Section G - does not replace any part of the 254 or 255

Again, redundant to other sections of the form, and time consuming for consistency and change for each submittal.

Suggest eliminating.

5. Part I, Section H -

Good page to include anything considered important that is not already covered in the other sections.

Suggest limiting to one page or keep as two page if eliminate Section G.

6. Part II

Response to General Instructions, #1: How does this the information on this page indicate a firm's actual qualifications for a project? #10 & #11 asks for index of revenues by profile code (same as before) however, now includes another category of experience. This has always been a time consuming effort, in a continual updating process and now it's adding yet another layer. And does it really tell you anything about the firm's ability to perform the work? It would make sense if this were used to determine if it is a small business, etc. - but then you would only need a lump sum, gross annual fee amount. The same applies to Federal, Non-Federal work.

The amount of revenue, fees can vary depending on the type of firm, type of actual responsibilities, location of the project, locations of the owner's paying the fees, etc. - and therefore $$ amounts shown on this page are not really an accurate gauge of the firm's ability. And, the fees and/or construction amounts are already given in the relevant project pages. And this is all assuming that the firm is reporting actual dollars.

It seems to me that if an agency selects a firm based only on the Part II form, it is selecting a firm based on their fee volume.

If GSA is simply looking for a one page form of firm profiles to refer to for projects not requiring a public announcement, then perhaps a re-designed one page form, kept separate from the 330, that just includes one line project info and references would be more appropriate.

As for the format, this page asks for much of the same information as Section I, Parts A, B, C & D, and has yet another signature page. The additional information it asks for can be combined with the 1st page of Section I.

608-23

The requirement that this form be completed by each team member firm AND an additional form for each branch office adds an inordinate amount of preparation time, asks some of the same information supplied in other areas of the 330, and again, fee volume does not equate to the ability to perform.

Suggest this form be eliminated as a companion form to Part I.

Overview

Most A/E firms have the 254/255 in digital format, which can be quickly retrieved and printed. It is the editing for consistency throughout the submittal, and updating of information that can be very time consuming. If pages such as resumes and project sheets can remain consistent and simply inserted as relevant to the submittal, it would streamline the process tremendously. This would be impossible with the 330 as presently designed.

The basic information included in the forms can always be supplemented by additional information required in the solicitation, if the project warrants.

Thank you for your consideration.

Sincerely,

Valli Johnsen
Florida Architects, Inc.
8517 South Park Circle
Suite 150
Orlando, Florida 32819
407.370.5555
vjohnsen@floridaarchitects.com

2000-608-24

"Pickering, Dave" <pickerdl@sverdrup.com>

12/04/2001 02:40 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc: "Pickett, Lori" <picketls@sverdrup.com>, "Bryan, Karen" <bryanka@sverdrup.com>, "Mahler, Tom" <mahlertw@sverdrup.com>
Subject: Jacobs Sverdrup Response to Request for Public Comment

We have reviewed the proposed SF 330 and can recognize no problems with it from our standpoint.

Sverdrup is committed to doing business with the federal government and, as such, we will adapt our procedures to comply with new processes or modified forms as necessary. We commend any effort to streamline processes and the proposed form seems to move in that direction.

David L. Pickering
Jacob Sverdrup Contracts

2000-608-25

"Earl, William F LRH"
<William.F.Earl@Lrh01.usace.army.mil>

12/05/2001 09:11 AM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc: "Warda, Robert F LRDGL" <Robert.F.Warda@lrdgl.usace.army.mil>
Subject: FARcase2000-608

- Comments on Form SF 330 - (12-3-01).doc

608-25

CELRH-EC-CM (1180) 3 December 2001

MEMORANDUM FOR General Services Administration
FAR Secretariat (MVP)

SUBJECT: FAR case 2000-608

1. Upon review of the consolidated form SF330, it is determined that the new form appears as a more efficient format with definite advantages over the existing SF's 254 & 255.

2. The proposed form change is timely and appropriate. The Council should be congratulated on a job well done.

3. For technical evaluation consideration, it might be helpful to have an index (quick reference) with page numbers for location of each section.

Ivan L. Farley
A/E Contracts Team Leader
Contract Management Section
Engineering & Construction Division

CF:
CELRH-EC-C
CELRH-EC-CM

2000-608-26

clive
<clives@earthlink.net
>

12/05/2001 11:26 PM
Please respond to
clives

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR case 2000-608

Comments on the Draft SF330
Many thanks for reviewing this.
I'd be keen to get your feedback.
--
* * * * * * * * * * * * * * * * * *
Clive Shearer, PE
Management Consultant
425/643-1233

FORM 330 - PART I
The form is more structured than the old 255, and also requires organization charts.
These, plus the 'portrait' format are beneficial changes.
However, there are two concerns, one minor and one major:

CONCERN 1 (minor):
All pages must now be numbered, plus the total number of pages noted on each page.
The benefit of numbering pages is obvious.
But the requirement that the total be given on every page will mean extra word processing,
Printing and binding any time a page is added to, or subtracted from the completed document.
Changes prior to submittal are inherent in most architecture, engineering and photogrammetric companies.

PROPOSED SOLUTION:
Each page should be numbered, but the total number of pages noted on the first page only.
Then any pages added or subtracted will only impact the first page and the pages that follow the change.
This will save time, paper and resources.

CONCERN 2 (major):
Section F - Block 31 poses a major problem:
Adding team member firms that have worked on each project is not an onerous requirement,
but the reality is that it will force Prime-Contractors to focus a lot more on selecting Sub-Contractors
with whom they have worked in the past.
In other words, the opportunity for a Sub-Contractor to develop a new relationship with a Prime will be limited.
This is bad news for business development, bad news for new companies trying to get teamed with an
experienced firm, and even bad news for the government.
This is because Primes will be tempted to contract with firms with whom they have worked before,
in lieu of teaming with a specialist, perfectly suited for that contract,
but with no prior experience with the Prime.

2000-608 - 26

They may even keep contracting with a mediocre firm simply because they may fear teaming with a new sub-consultant (as it will look bad in Block 31 to have blank spaces.) In summary, Block 31 would be a governmentally imposed impediment to free competition, and may also result, in some cases, to less than satisfactory project results.

Section F - compounds the above problem:
In the 255, each Sub-Contractor typically provided their own list of 10 projects, and these were added to the Prime's list of 10 projects in the submittal. The instructions for Section F, states "present 10 projects, unless otherwise specified by the agency."
This would compound the difficulty mentioned above as a Sub-Consultant's project experience won't get demonstrated, again giving the Prime-Contractor less inclination to team with a firm with whom they have not worked in the past.

Section G - also compounds the above problem:
Section G re-lists the 10 projects from Section F, and then requires that the Prime-Contractor note the involvement of key personnel in those 10 projects. This compounds the above-mentioned problem as it will look bad if the Sub-Contractor's personnel did not work on any of the Prime's projects, even though the Sub-Contractor may have a wealth of experience with other teams.

PROPOSED SOLUTION
Fortunately, the solution is not too difficult to implement.

Solution 1.
Eliminate Block 31.
Replace it with a blank space.
Allow each submitter the discretion to describe the best features of their project in terms of its applicability to the proposed project.
This might be
· proposed team members worked on that project,
(if they choose to mention this, rather than having it mandated),
· the scope matches the proposed project,
· a tight schedule was met,
· money was saved,
· unusual problems were solved etc.
In other words, turn Block 31 into an expanded Block 28. (Block 28 is tiny anyway)

Solution 2:
Allow each Sub-Contractor to add their own 10 projects to the submittal.
This will need the minor change of adding a Block to the top of Section F with space for the Sub-Contractor's company name.

Solution 3:
Allow each Sub-Contractor to add their own Section G to the submittal.
This will need the minor change of adding a Block to the top of Section G with space for the Sub-Contractor's company name.
Then the 10 projects will be the Sub-Contractor's projects and the key personnel listed will relate their experience to the Sub-Contractor's own projects.

2000-608-27

"Gagliano, Frank C MVN" <Frank.C.Gagliano@mvn02.usace.army.mil>

12/10/2001 02:51 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc: "Thomas, Clarence E MVD" <Clarence.E.Thomas@mvd02.usace.army.mil>, "Satterlee, Gerard S MVN" <Gerard.S.Satterlee@mvn02.usace.army.mil>, "Fairless, Robert T MVN" <Robert.T.Fairless@mvn02.usace.army.mil>, "Flock, James G MVN" <James.G.Flock@mvn02.usace.army.mil>, "Gautreau, Paul M MVN" <Paul.M.Gautreau@mvn02.usace.army.mil>, "Gagliano, Frank C MVN" <Frank.C.Gagliano@mvn02.usace.army.mil>
Subject: Comments to FAR:New Consolidated Form for Selection of A-E Contractors; Proposed Rule

The following are comments to the Federal Register, 19 Oct 2001, publication and request for comments on the subject item, specifically, on the proposed SF 330 - Architect-Engineer Qualifications. These comments are specifically from Engineering Division, New Orleans District, U. S. Army Corps of Engineers (CEMVN-ED).

a. Page 5 of SF 330 does not list Hydraulic Engineer or Hydrographic Surveyor among the List of Disciplines; is there a provision to add to the printed list?

b. Pages 6 and 7of SF 330 does not list Geodetic Surveying or Topographic Surveying among the List of Experience Categories; is there a provision to add to the printed list?

c. The following comment is offered from an evaluator for A-E qualifications:

In the SF 254/255's, much of the relevant information is taken from block 10, which may be used by the A-E contractors to specifically address the evaluation requirements of the solicitation. The solicitation is presented in the Commerce Business Daily (CBD)or to the Small Business Association. All other blocks of the SF 254/255s are used to validate what was stated in block 10; at least for the most part. May we assume that SF 330 will permit the AE's to continue to more thoroughly address the CBD evaluation requirements using the miscellaneous blocks rather than limiting their input to specific subject blocks?

Frank C. Gagliano
CEMVN-ED-SA
504/862-2622

2000-608-28

"Chris David"
<cdavid@adtekengineers.com>

12/10/2001 05:43 PM

To: farcase.2000-608@gsa.gov
cc: ksilberman@cecmw.org
Subject: FAR case 2000-608

The following are my comments relating to FAR case 2000-608 relating to the new SF 330 which is to replace the existing SF 254/255.

My primary comment is as follows:

The suggested "teaming" requirement and matrix contained in this form is anti-competitive and restrictive. The form will reduce competition and make it difficult for small and minority firms to develop Federal experience. Prime contractors will be highly motivated to maintain the same sub-contractor team from project to project, thus limiting opportunities. Prime contractors will make "go / no go" decisions soley on the basis of the teaming requirements suggested by the form, thus reducing competition.

The reason for this is that a great deal of emphasis is placed on 1) past experience of firms (prime and consultant) working together, 2) past experience of firms (prime and consultant) working together on similar projects, and 3) past experience of the people assigned to the project working together on the projects submitted as part of the form. The form basically asks, "has this team worked together and have all of the staff members submitted as part of this team worked together." That is a very difficult and limiting requirement and will preclude many firms (both big and small).

These seem like reasonable questions to ask. However, the "team" component is one of THE primary emphasis of the form. THE primary emphasis of the form should be "does the prime contractor have good experience and does the prime contractor have good references." The prime contractor, if it is a good business, will team with firms it believes it can perform well with.

Here's one of many examples of how the FORM reduces competition:

1) A GSA design project comes out in the CBD.
2) Sub-Contractor X has GSA experience.
3) Sub-Contractor X has experience with Prime Contractor X.
4) However, Sub-Contractor X has never worked together with Prime Contractor X on a GSA project.
5) Another Sub-Contractor, Sub-Contractor Y, has worked together with Prime Contractor X on a GSA project.
6) Both Sub-Contractor X and Sub-Contractor Y are equally qualified to do the project and the Prime Contractor X should feel free to choose either one. However, given the structure of the form, the matrix, Prime Contractor X will be much more likely to consider only Sub-Contractor Y. When Prime Contractor lists it's 10 project examples, it is going to include the Sub-Contractor it can "check" the most boxes with.

Right now, the 255 has one place to check "team" experience. ONE place. That is a fair requirement and gives the reviewer a feel that the team has worked together. Many firms work VERY hard just to get into the position that they can check that box in ONE place. It has taken me years, in some cases, to get a couple of small projects under our belt with a Prime Contractor before they would be willing to include me on larger contracts and could check the ONE box.

The SF330 extends this "team" experience into the 1) "relevant projects" section, 2) the "resume" section, and 3) "matrix" section. THIS UNNECESSARILY REDUCES COMPETITION.

2000-608-28

SOLUTION:

1. GET RID OF THE MATRIX ---FOCUS ON PROJECT EXAMPLES AND REFERENCES.

2. The form should simply ask the question "have the firms worked together."

OTHER COMMENTS:

1) Get rid of the "page number" boxes, especially the "of" box. Try to figure that one out when you are receiving information from other firms.
2) Get rid of the restrictive boxes on the resume where you are suppose to list projects. Just give us a box and indicate the type of information that should be provided in one sentence. This is going to happen anyway, you might as well give the freedom now.

Chris David
Principal

ADTEK Engineers, Inc.
Civil, Structural & Geotechnical Engineering
3251 Old Lee Highway, Suite 405
Fairfax, Virginia 22030
Phone: 703-691-4040
Fax: 703-691-4056

web site: <http://www.ADTEKengineers.com >

2000-60829

"Mel Chapman"
<mchapman@cfse.com>

12/11/2001 09:45 AM

To: farcase.2000-608@gsa.gov
cc:
Subject: FW: FAR case 2000-608

-----Original Message-----
From: Mel Chapman [mailto:mchapman@cfse.com]
Sent: Monday, December 10, 2001 5:32 PM
To: 'farcase.2000@gsa.gov'
Subject: FAR case 2000-608

My comments on the new SF 330 form are:

1. In Part II, the form does little to inform the government of the specific experience of the firm. The category is given but no particulars such as "Headquarters Buildings", "Spillway Modifications", etc. can be shown. This all has to come later when Part I is submitted. The smaller firms, that might not be as well known as the larger firms, will have trouble getting shortlisted off the Part II only.

2. In Part I, Section G,items 34, 35, 36, and 37, this is duplicate information that is already shown on the resumes. This section will present the same information in a different format allowing the government to review more quickly. We would hope the electronic forms are user friendly to allow the easy transfer of information between blocks.

3. The organization chart appears to be an attached item. If the chart can be sent electronically in Adobe format, it should be easily readable by the government. The various firms may have multiple organizational chart software which would make reading the organizational chart difficult.

Mel Chapman
Cook, Flatt & Strobel Engineers, P. A.
6111 SW 29th Street
Topeka, KS 66614
(785) 272-4706
(785) 272-4736 (Fax)
mchapman@cfse.com

2000-608-30

"Sue Tang"
<stang@han-padron.c
om>

12/11/2001 12:41 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR Case 2000-608

Dear Ms. Duarte:

Han-Padron Associates, LLP, (HPA) submitted written comments regarding the proposed SF 330 on December 5, 2001.

At this time, we would like to recommend one addtional change. Under Part I, List of Experience Categories (Profile Codes), we ask that "Underwater Inspection", a service commonly provided by marine facilities engineering firms, be included.

Regards,

Sue Tang
Marketing Administrator

2000-608-31

"Elizabeth Davis"
<Elizabeth.Davis@Smithgroup.com>

12/11/2001 11:31 AM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: Comments FAR Case 2000-608

<<SF330 Final Comments FAR Case 2000-608.doc>>

Elizabeth Davis
Marketing Systems Manager
SmithGroup
602-824-5383

- SF330 Final Comments FAR Case 2000-608.doc

2000-608-31

From: SmithGroup, 2800 N. Central, Suite 1200, Phoenix, AZ 85004
Elizabeth Davis – 602-824-5383
RE: FAR Case 2000-608

SF 330 Form – Part 1

Comments

1. The form seems very tight in its design and appears to be lacking the flexibility of the existing 254/255 forms.

2. There are many black graphic lines and boxes on the form. Since the form is "tight", this use of lines makes it difficult to read.

3. The portrait format will be easier to work with.

4. Overall, the form appears to be somewhat more complex than the existing 254/255 forms, which leads to concerns of its flexibility and ability to be generated from a database.

Questions

5. Will the A/E user be allowed to expand the form, as necessary, to allow more space for information such as project descriptions?

6. Will the A/E user be allowed to re-create the form to present the information in an aesthetically pleasing format, as long as the information remains the same?

7. Section E – Block 20: "If the person has more than two relevant degrees, show in Other Professional Qualifications (block 22)." Is it possible to expand the form, if necessary, to include all degrees in Block 20? Dividing the location of the degree information into two separate blocks will be challenging when creating this form from a database.

8. Section E – Block 21: "If the person has more than two relevant professional registrations, show in Other Professional Qualifications (block 22)." Is it possible to expand the form, if necessary, to include all relevant registrations in Block 21? Dividing the location of the registration information into two separate blocks will be challenging when creating this form from a database.

9. Section E – Block 23: Can more than five projects be listed as relevant experience for team members?

10. Section E – Block 23-3: Please elaborate on the type of information required for the "professional services" block and the "construction" block, are you requesting the year professional services was completed and the year construction was completed?

11. Section E – Block 23-4 attachment of photos: How and where are photos to be attached? Are color laser prints acceptable in lieu of actual photographs? Please provide instructions for labeling the photo so that the reader knows which project is being represented.

12. Section E – Block 23-5: Please elaborate on the information required for this field. Are you requesting a title role such as "mechanical engineer" or "project manager", or are you requesting a description of the duties the individual performed in this role for the project?

13. Section F – Block 26: Is the actual project owner name to be listed or just the term government agency, institution, corporation, etc?

14. Section F – Block 28 - attachment of photos: How and where are photos to be attached? Are color laser prints acceptable in lieu of actual photographs? The 255 Item 8 form allowed for an image of the project to be included directly on the Item 8 form itself, will this be allowed on the new form in lieu of attaching a separate piece of paper with an image on it? If the goal is to cut down on paper, having the project image reside on the same sheet as the project information will help meet this goal. Please provide instructions for labeling the photo so that the reader knows which project is being represented.

2000-608-31

15. Section F – Block 28: Can this space be expanded to accommodate all of the information being requested?

16. Section F – Block 29-b: Is the fee information required for all projects? Some A/E firms consider this information confidential.

17. Section G – Item 36 and 37: The instructions for completion of this matrix are confusing. Having a matrix such as this may require the A/E firm to complete this section manually, rather than being able to generate this part of the form from a database. Perhaps the use of letters instead of numbers would be less confusing. Example: use the letter "P" to indicate the individual participated in the project in any capacity; and the letter "S" to indicate the individual performed the same or similar role on the project.

SF 330 Form – Part 2

18. Will we have the flexibility to expand the page to accommodate all the information, or is it required that the form be limited to one page? For firms with a large number of employees, the space allocated for projects and discipline counts will be limiting.

19. Section 10: Is this list to include a project example for every "relevant" experience category, the implication being that if an experience category is not relevant, it would not be included in this specific Part II (unlike the more general predecessor, SF254)?

List of Disciplines

20. The list does not include disciplines such as mechanical designers and electrical designers, but does include mechanical engineer and electrical engineer. How should mechanical and electrical designers be classified? In some states, a mechanical or electrical designer cannot legally be referred to as an engineer unless they are licensed in that profession in which case they must be referred to as a mechanical designer or electrical designer.

21. An individual who is a Project Manager is generally an Architect or Engineer as well. How does one determine which discipline should be their primary function when their primary function is both?

22. Based on the written instructions to date regarding disciplines, it is our understanding that an A/E firm can create an unlimited number of additional disciplines, without a function code, to use for individuals that do not fall under the codes provided by the government. Is this assumption correct? There are many disciplines that are not represented on the government provided list.

Profile Codes

23. Based on the written instructions to date regarding profile codes, it is our understanding that an A/E firm can create an unlimited number of additional profile codes, without a code number, to use with projects that do not fall under the codes provided by the government. Is this assumption correct? There are many project types that are not represented on the government list.

24. Instructions for Part II - Block 10 indicate that "...A particular project may be identified with one experience category or it may be broken into components..." Many projects have several profile codes that are applicable. For projects that list several profile codes, do the revenues need to be broken down by profile code for the project as well?

25. If a firm completed a hospital project for which they provided cost engineering, laboratory design, and security system design, should all of these corresponding profile codes be used for the project or should just the profile code for hospital and medical facilities be used?

26. Will a description or explanation of the profile codes be provided to aid in determining if a project should be classified under a particular code?

2000-608-32

"Linda Rodgers"
<lrodgers@gnv.3001data.com>

12/12/2001 05:42 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: Far Case 2000-608

On the new form SF 330, please add to the List of Disciplines:
GIS Technicians
LIDAR or Remote Sensing Technicians

also

Add to the List of Experience (Profile Codes)
LIDAR or Remote Sensing

Will there be more area in the project area for a project descirption and in the personnel areas to expand on their experience?

2000-608-33

"Jackson, David A NWK" <David.A.Jackson@nwk02.usace.army.mil>

12/13/2001 10:59 AM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: Federal Register/Vol 66, No. 203/Friday, October 19, 2001/Propose d Rule

A typo was found on page 53322, under Code UO1: the word "Ordnance" is misspelled

2000-608-34

"Baker, William"
<wbaker@dewberry.com>

12/13/2001 04:22 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: FAR Case 2000-608

On behalf of the Dewberry Companies, I submit our comments on the proposed new SF330. Please feel free to contact me for further clarification if required.

William C. Baker
Director, Strategic Planning & Business Development
Dewberry Companies
703-849-0404
wbaker@dewberry.com

- Response comments to new SF330 Public.doc

2000-608-34

The Dewberry Companies

8401 Arlington Boulevard
Fairfax, VA 22031
703.849.0100
www.dewberry.com
Contact: William C. Baker

SF 330 Comments Response

FAR case 2000-608

General:
We are in support of a change to the current SF255/254 form; to what extent is the question. Change is in response to the growth and complexity of technology. How will change shape the future of our industry?

We offer the following suggestions to the SF330:

1. Should the form be landscape in lieu of portrait?

2. What is the required font size? If 10 point, hard to read; if 12 point, difficult to fit in required information in block size indicated.

3. If this is in electronic format, comment 2. above may not be applicable as long the block ranges are defined.

4. Will the form be available in Microsoft Word and/or some other industry acceptable format?

5. Suggest a transition period for SF255/254 to SF330 of two-five years.

Para C. Paperwork Reduction Act

1. 33 hour preparation does not include initial conversion and preparation from SF255/254 which could be extensive and burdensome to most firms. Select database computer firms are addressing the issue of a conversion software tool and what the impacts might have on our industry.

List of Disciplines (Function Codes):

1. How is the list expanded for additional functions?

List of Experience Categories (Profile Codes):

1. The understanding is the profile "codes" have been changed to accommodate an alpha numeric system with the potential to add additional categories as warranted. The difficulty this creates is a conversion process from the old profile codes numbering system, e.g. 063 to M01, etc. Some firms have utilized the three digit numbering system (063) as their marketing and project number classifications. The change could be extremely burdensome when and if a conversion computer program could be identified.

The Dewberry Companies
8401 Arlington Boulevard
Fairfax, VA 22031
703.849.0100
www.dewberry.com
Contact: William C. Baker

608-34

SF 330 Comments Response

FAR case 2000-608

Part I – Contract – Specific Qualifications:

E. Resumes of Key Personnel Proposed for this project, 23. Relevant Projects, Block (4) Description:

1. Can the blocks be enlarged so information can be readable?

G. Key Participation in Example Projects:

1. Automatically disqualifies firms/personnel with little specific experience and those firms/personnel targeting entry into new markets. Disqualifies most small to medium firms/personnel due to limited and/or specialized project experience.

H. Additional Information, Block 38:

1. Suggest standardizing requested information from Note 24 and included in this Block:
    a. Professional capabilities.
    b. Specialized experience and technical competence.
    c. Capacity to accomplish the work in the required time.
    d. Past performance on contracts with respect to cost control, quality of work, and compliance with performance schedules.
    e. Geographic location and knowledge of the locality of the project, provided that application of the criterion leaves an appropriate number of qualified firms, given the nature and size of the project.
    f. Any other special qualification required under this announcement by the contracting activity.

608-34

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Contact: William C. Baker

SF 330 Comments Response

FAR case 2000-608

Architect-Engineer Qualifications Form
Part II – General Qualifications:

Block 4. Duns Number:

1. Is the Dun and Bradstreet information proprietary?

Block 8a-8c Former Firm Names:

1. Same as comment 1. above.

Block 9. Employees by Discipline, Part a. Function Code:

1. Limited to 20 entries. Most large firms have more than 20 functions.

Block 10 Profile of Firm's Experience and Annual Average Revenue for Last 5 Years, Part a. Profile Code:

1. Not enough entry lines for medium to large firms to accurately define.
2. Multiple profile codes may apply to one project; how are they entered.

2000-608-35

"Pavlides, Michael G" <MGPavlides@pbsj.com>

12/13/2001 10:37 AM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc: "Skipper, Kevin E" <KESkipper@pbsj.com>
Subject: Comments on Far Case 2000-608 (SF330)

<<SF330 Comments.doc>> Please accept the attached comments from PBS&J concerning the SF330 forms to replace the SF254/255..

Michael G. Pavlides
Vice President
PBS&J
12101 Indian Creek Court
Beltsville, Maryland 20705
301.210.6800 Ext. 433
301.210.5159 (fax)
mgpavlides@pbsj.com

- SF330 Comments.doc

608-36

I. General Comments regarding the SF 330

1) We applaud the efforts to streamline the SF254 and SF255. While there is some improvement, the SF330 does not appear to provide significant change to warrant the cost of revision and conversion of all information that is currently in standard and modified SF254/255 formats.
2) The standard "portrait-style" format for the forms is not as easy to use as "landscape format" of the current SF254/255and is a less efficient use of space for text information. The forms are very space-limited. We have assumed that submitters will have the opportunity to modify the forms, expand the space accordingly, and use landscape format.
3) For some types of submissions, Joint Ventures in particular, the SF330 may not be as efficient to prepare (or review) as the current SF254/255 (as typically modified by submitters).

II. Comments regarding the SF330:

1) **The List of Discipline Codes (Function Codes)** should include some additional descriptions that are repetitively used for A-E and Construction Management projects such as:

    - Contract Administrators,
    - Quality Control/Quality Assurance (QA/QC) Specialists, and
    - under "Engineers" we propose the addition of "Water Resources"

    We presume that "Geodetic Surveyors" and/or "Topographic Surveyors" is meant to be inclusive of Photogrammetrists? If not, should the category be added?

    "Geospacial Information Systems" could be re-stated as "GIS Specialists." If it is left as is, should "Geospacial" be spelled "Geospatial" ?

2) **The List of Experience Categories (Profile Codes)** and subsequent development of the Professional Services Revenue Index Number is notably difficult for many A-E firms to maintain accurately and current. A-E projects typically include many of the experience categories, however, some firms do not maintain separate cost information for each of the experience categories on a per project basis and consequently may be erroneously reporting entire project revenue for each of the experience categories. This distorts their experience base. It is possible therefore that the Revenue Index Numbers are of questionable accuracy, and if that is the case, the reliability of this Index as an indicator of experience and capability. is very questionable and of little value. An alternative approach might be to request the number of projects performed for each of the Experience Categories over the past 3-5 years and the value of the largest single project specifically.

    We presume that additional profile codes can be added by firms as appropriate.

2000-608-35

3) **SF 330, Part I, Page 8 Comments:** Should this page or the instructions to it, include a small business indicator? For example, perhaps another column can be added next to the Subcontractor Column indicting "small business designation"?

4) **SF330, Part I, Page 9 Comments:** Under 23. Relevant Projects, box (5) Specific Role – should there be a request in the box or the instructions thereto to cite the "number of years in the role and/or project?" Duration may be a stronger indicator of experience than just involvement.

   The instructions to Page 9 (please reference SF 330, Page 2, Section E instructions) specifically direct the submitter to group resumes by "firm". Should there be consideration given to also permitting ordering the resumes according to the submitted organizational chart if desired by the submitter? In some cases this might be more appropriate for the review of the qualifications.

5) **SF330, Part I, Page 10 Comments:** Under 31, Firms From Section C Involved With This Project - should the dollar volume of work each firm performed with the project be listed or cited as a requirement in the instructions? This would be a good indicator of the level of project involvement and actual experience gained by the firms.

   Also under **31, Block (2):Firm Location (city and state)** appear to be redundant to Part I, Section C, Proposed Team info. We recommend elimination and use of the space for expansion of block 3. Role.

6) **SF330, Part I, Page 11 Comments:** Should the Prime, JV, Subcontractor columns from Part I, Page 8 be repeated on the left hand side of this page to indicate which firm the personnel are with?

7) **SF 330, Part II, Comments:**

   - Box 7 cites a reference to ",,,,block 3a....", however there is no block 3a. Should this reference be to "......block 2a......" ?

8) Instructions to Block 33: this paragraph references the CBD instead of FedBizOps.

2000-608-36

McCluggage Van Sickle & Perry

December 13, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
Attention: Ms. Laurie Duarte
Washington, DC 20405

Via Fed Ex

RE: FAR Case 2000-608
SF 330, Proposed Rule

Dear Ms. Duarte:

Thank you for the opportunity to comment on the proposed SF 330 form. We believe the current SF 254 and SF 255 forms have provided a beneficial avenue for emphasizing Architect-Engineer Qualifications the past 25 years. We are concerned about the proposed SF 330, specifically in two areas:

1. Part 1, Section F, 29b. Questions about past fees are inappropriate. Providing past fees without a corresponding definition of scope of work gives unclear information for the job being pursued.

2. Part 1, Section G, 34-36. This is a terribly confusing section. We are not sure the benefit this information would provide to the firm submitting the form.

Thank you for your consideration of our concerns.

Sincerely,

Jeffrey T. Van Sickle, AIA
Chief Executive Officer

JTV:dlo

ARCHITECTS • PLANNERS • LANDSCAPE ARCHITECTS • INTERIOR DESIGNERS

WICHITA:
P.O. Box 3848, Wichita, KS 67201 • 125 S. Washington, Wichita, KS 67202
PH 316-262-0451 • FAX 316-262-5465 • *E-mail: mvp@southwind.net*

SALINA:
603 United Building • 119 West Iron, Salina, Kansas 67401
PH 785-823-3149 • FAX 785-823-7124 • *E-mail: mvp3@midusa.net*

Recd 12/14/2001

2000-608-37

Johnmapps@aol.com
12/14/2001 10:38 AM

To: farcase.2000-608@gsa.gov
cc:
Subject: SF 330 comment

December 14, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW
Room 4035
ATTN: Laurie Duarte
Washington, DC 20405
RE: FAR Case 2000-608

Dear Ms. Duarte:

The Management Association for Private Photogrammetric Surveyors (MAPPS) is a national association of more than 155 private sector firms, employing more than 6,000 individuals, engaged in professional surveying and mapping services, many of which are contractors to the U.S. Government.

We appreciate this opportunity to comment on the proposed SF 330, for Architect-Engineer Qualifications.

MAPPS commend the task force that developed the SF330. We know a considerable amount of time and effort went into this proposal, and we deeply appreciate the dedication of those involved. We generally find the form to be an improvement over the current 254-255 and believe it will not only save time for competing firms, but provide much more useful information to Federal contracting agencies.

The one shortcoming we found in the proposed SF 330 is its treatment of the surveying and mapping profession. The "Brooks Act" and the FAR were amended in the late 1980's, by revising the definition of architectural and engineering services to specifically include "surveying and mapping". As a result, the 254/255 is currently used, and the SF 330 will be used, for procurement of surveying and mapping services.

We do not believe the proposed SF330 adequately reflects state-of-the-art practice and the full range of services provided by surveying and mapping firms, nor the range of services required by and procured by Federal agencies. The current proposal has a List of Disciplines (Function Codes) and a List of Experience Categories (Profile Codes), that are not as well organized as possible, and fail to provide competing firms, or evaluation teams in agencies, an ability to fully consider the personnel and experience of firms. As a result, we recommend the attached revisions to the proposed forms.

These proposed revisions have been developed jointly by MAPPS, ASPRS and the American Congress on Surveying and Mapping (ACSM). It is our understanding that ASPRS and ACSM will be filing separate, but similar comments. The attached proposal reflects the combined and unified recommendation of the surveying and mapping community, including those individuals in private practice, as well as those in government services, including the Federal surveying and mapping workforce.

Again, we commend the team that worked on development of the proposed SF 330, we appreciate this opportunity to comment and we urge the adoption of the SF 330 with these recommended improvements.

Sincerely,

608 31

John M. Palatiello
Executive Director

Recommended SF 330 Changes RE: Surveying and Mapping

Revise the List of Disciplines (Function Codes) by striking:

Cartographers
Geodetic Surveyors
Geospacial (sic) Information Systems Specialists
Topographic Surveyors

And re-organizing them in a new list with a general category and sub category, just as the form proposes for Engineers. Our proposal is to list surveying and mapping disciplines as follows:

Surveyor and Mapping Scientists:
_ _ Aerial Photographer
_ _ Cartographer
_ _ Geodetic Surveyor
_ _ Geographic Information Systems Specialist
_ _ Hydrographer
_ _ Image Analyst/Photo Interpreter/Photo Lab Specialist
_ _ Land Surveyor
_ _ Photogrammetrist
_ _ Remote Sensing Scientist

We would also suggest adding a general category for "Engineering/Design Software Developer"

Revise the List of Experience Categories (Profile Codes), by striking:

Aerial Photogrammetry
Construction Surveying
GIS Development/Analysis
Hydrographic Surveying
Land Boundary Surveying
Surveying: Platting, Mapping; Flood Plain Studies
Topographic Mapping

And re-organizing them in a new list with a general category and sub category. Our proposal is to list surveying and mapping disciplines as follows:

Surveying and Mapping

_ _ _ Aerial Photography & Airborne Data and Imagery Collection and Analysis
_ _ _ Cartography
_ _ _ Charting (Including Nautical and Aeronautical)
_ _ _ Close Range or Terrestrial Photogrammetry
_ _ _ Construction Surveying
_ _ _ Digital Orthophotography
_ _ _ Digital Elevation & Terrain Model Development
_ _ _ Environmental & Natural Resource Mapping (habitat, natural and man-made phenomena)
_ _ _ GIS Services: Development/Analysis/Data Collection
_ _ _ Geodetic Surveying (Ground and Airborne GPS)
_ _ _ Geospatial Data Conversion (including scanning, digitizing, compilation, attributing, scribing and drafting)

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_ _ _ Hydrographic Surveying
_ _ _ Land Surveying
_ _ _ Location/Addressing Systems
_ _ _ Photogrammetry
_ _ _ Remote Sensing
_ _ _ Topographic Surveying and Mapping

Flood Plain Studies should be a separate, independent category and a new separate, independent category should be established for Environmental Planning.

2000 608-38

"Jacobazzi, Joseph D LRC" <Joseph.D.Jacobazzi@lrc02.usace.army.mil>

12/14/2001 03:12 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc: "Roncoli, Mark A COL LRC" <Mark.A.Roncoli.COL@lrc02.usace.army.mil>, "Evick, Donald R HQ02" <DONALD.R.EVICK@HQ02.USACE.ARMY.MIL>, "Warda, Robert F LRDGL" <Robert.F.Warda@lrdgl.usace.army.mil>, "Salinas-Nix, Velma LRC" <Velma.Salinas-Nix@lrc02.usace.army.mil>, "Rochford, William A LRC" <William.A.Rochford@lrc02.usace.army.mil>
Subject: Chicago District Comments to FAR case 2000-608

Comments from the Chicago District, US Army Corps of Engineers, to the Proposed Rule - New Consolidated Form(SF 330) - FAR case 2000-608 - are attached.

We are appreciate the opportunity to comment on the proposed rule change.

Joseph D. Jacobazzi

Chief, Engineering Division

<<Form330_.doc>>

- Form330_.doc

2000-608-38

FAR case 2000-608
Comments to New Consolidated Form for Selection of Architect-Engineer Contractors from Chicago District, US Army Corps of Engineers

Part I - Contract-Specific Qualifications

Sections D - In addition to an organization chart and detailed information of key personnel, the firms responding to a solicitation should also indicate all other personnel by discipline and location (Branch Office) that they are willing to dedicate to the proposed work. This information is important to determine expected capacity of the firm particularly for an Indefinite Delivery Contract where specific requirements may not be known at the time the solicitation is issued.

Section E - Block 23. There may be instances where it would be advantageous to list more than five projects for each individual - such as a solicitation for an individual technical expert with substantial experience. For this reason, suggest adding the following to the start of this paragraph, "Unless otherwise required by the announcement for services"

Section E - Block 23. The instructions should provide some latitude to modify the standard format of Section E when a more detailed description of experience is needed for a particular solicitation. Suggest adding a statement to paragraph 23 that the format shown for Section E may be modified as necessary to fit a particular selection requirement.

Section E - Block 23. The instructions to complete block 23 of Section E should emphasize that the descriptions of relevant projects should address, where they apply, the specific selection criteria contained in the announcement of services.

Section F - Blocks 28 and 31. Suggest modifying Section F format - blocks 28 and 33 on the proposed format do not allow sufficient space to adequately describe projects or additional information. Suggest redesigning the form to allocate more space to blocks 28 and 33 by reducing the area allocated to list firms in block 31 from nine to three. If more than three firms need to be listed, these could be included on a separate continuation sheet.

Section F - Block 28. The instructions for completing block 28 of Section F should indicate that he description of each project should address the specific selection criteria contained in the announcement for services. Also, in addition to identifying relevance of the project to the intended work we should also require that the firm indicate their specific responsibility in regards to the project. Identify precisely what work they performed on the project. Many times we have more than one firm referring to the same project and it is not stated exactly what role they performed.

Section G - Block 36. Suggest eliminating the use of numbers in the matrix. Recommend a "X" for an individual having experience on the indicated project. It is uncertain what value a "2" designation would have and will likely lead to confusion.

List of Disciplines (Functional Codes) - Page 5 - Suggest adding, "Hydraulic Engineer" under the list of Engineers.

List of Experience Categories (Profile Codes) - Suggest adding, "Diaphragm Walls", "Groundwater Remediation; Modeling", "Hydrology", "Navigation Structures - Locks and Dams", and "Sedimentation Analysis" to the list of experience categories.

Part II - General Qualifications

Blocks 9 and 10 - Suggest modifying the form to clearly indicate that the information in Block 9 is not related in any way to the information in Block 10.

2000-608-38

Block 11 - Annual Average Professional Services Revenues of Firm for Last 3 Years. Currently, one of the factors used as a tie-breaker on DOD selections is the volume of **DOD** work in the past 3 years. Unless this rule proposes to change this to the total volume of Federal work in the past 3 years, it would be advantageous to breakout the Federal work in the past 3 years for each Federal agency.

2000-608-39

"Sauerwein, Rick"
<sauerwein@BATTEL
LE.ORG>

12/14/2001 05:29 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: FAR Case 2000-608

Laurie - Here are Battelle's consolidated comments regarding the proposed SF 330. Should you have any questions please contact me.
<<SF 330 Battelle Comments.doc>>

R, Rick Sauerwein
Director, Navy Programs
(805) 382-0983

- SF 330 Battelle Comments.doc

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Battelle's Comments Regarding Replacement of SF 254/255 with SF 330

The proposed SF 330 should be a marked improvement over the SF 254/255, but the "Information Collection Requirement" is still significantly underestimated.

The form also seems to significantly overestimate the importance of previous experience with team members.

We do not see any place to add information on management capabilities or to show understanding of the needs and issues of the client (the former Section 10), which could be a detriment to distinguishing one firm from another.

The requirement to show proposed key staff against the projects presented in the form tends to favor, those firms with only a small number of staff who will show up on nearly every project, rather than larger, more diverse firms with a number of staff qualified for the positions, but may not have been involved on the majority of the jobs presented to show capability.

We support the addition of Section 23, which should provide valuable discriminating information.

We support the use of Part II to present specific information on branch offices that may be more local to the client than offeror's corporate headquarters.

We expect that there will be a significant cost to all A/E's in adopting these forms. Most of them already have an established format and process for completing the SF 254/255.

The Part I, Section C requirement to submit separate Part II's for **each** branch office is excessive. In today's collaborative web-based engineering design environment, it is commonplace to use task-oriented teams from multiple locations to provide the most cost-effective project execution. The government's requirement to list every possible participating branch office inhibits the A/E's ability to effectively manage resources and bring the best available talent to the project based on often-changing competitive resource demands. We recommend that only the lead branch office be listed in Block C.

Part I, Section D: See comment for Part I, Section C.

Part I, Section E, Block 19: See comment for Part I, Section C. The government should not be concerned with where the resources are coming from, but rather should focus on gathering information that will confirm the A/E's ability and commitment to provide the desired work product in the required time.

Part I, Section E, Block 23: The checkbox for "Photos Attached" is more appropriate for Section F and should be eliminated here to allow adequate space for the project description.

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Part I, Section E, Block 28: This information is perhaps the most important data point in the A/E selection process, and more space should be allocated to ensure completeness.

Part I, Section F, Block 31: This requirement over-emphasizes the importance of the past working experience of team members to the detriment of the space available for the essential information provided in Block 28. Recommend eliminating this requirement entirely or at a minimum reducing it to no more than 3 citations.

Part II, Block 1: We recommend that "FILE COPY" be entered in this block when Part II is being submitted to regional Procurement Offices so that they may keep a copy on file for unadvertised requirements.

Part II, Block 10.b: Please clarify what is to be entered in this space. Should the generic "Description" provided with the Profile Code be used, or should specific capabilities requested in the RFP be noted?

2000-608-40

"Thomas, Clarence E MVD" <Clarence.E.Thomas@mvd02.usace.army.mil>

12/14/2001 04:54 PM

To: '"farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc: "Ward, Jim O MVD" <Jim.O.Ward@mvd02.usace.army.mil>, "Thomas, Clarence E MVD" <Clarence.E.Thomas@mvd02.usace.army.mil>
Subject: FAR case 2000-608

The Mississippi Valley Division is focused on flood control and navigation work in the Mississippi River Valley. We contracted for over $70 million of Architect-Engineer services in fiscal year 2001. Overall the new SF 330 is a good product. We offer the following comments on new SF 330 - Architect-Engineer Qualifications (FAR case 2000-608):

Instructions, Part 1, Section F: Change "Present ten projects" to "Present up to ten projects".

List of Disciplines (Function Codes): Add the following:

Hydraulic Engineer
Hydrographic Surveyor

List of Experience Categories (Profiles Codes): Add the following:

Flood Control Studies and Design
Hydraulics; Open Channel
Hydropower Generation
Levees and Dikes
Locks and Dams; Shallow Draft Navigation
Navigation Studies and Design
Pumping Plants; Flood Control
Surveying; Geodetic

List of Experience Categories (Profiles Codes): Change the following:

Change "Dams (Earth; Rock); Dikes; Levees" to "Dams (Earth; Rock)"
Change "Topographic Mapping" to "Topographic Surveying and Mapping"

Form, Part I, Section C. PROPOSED TEAM: Have two columns for subcontractors "SUBCONTRACTOR NEVER WORKED WITH PRIME BEFORE" and "SUBCONTRACTOR WORKED WITH PRIME BEFORE". See SF 255, Block 6.

Form, Part I, Block 11: Have two columns "ANNUAL AVERAGE FOR LAST 3 YEARS" AND "LAST 12 MONTHS".

Form, Part I, Section F, parenthetical instructions: Change "or 10 projects" to "or up to 10 projects".

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Form, Part II, Block 7: Change "If block 3a" to "If block 2a".

Form, Part II, Block 12c: Delete "OF AUTHORIZED". It is redundant and not consistent with Part I, Block 41.

2000-608-41

"Kenneth W. Forsyth" <forscon@email.msn.com>

12/15/2001 12:23 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR Case 2000-608

Comments attached are in MS Word format, and are provided by:

Kenneth Forsyth, P.E.
Forsyth Consulting
6137 Coronado Drive
Mobile, AL 36693-3725
Phone 251.666.2253

- FARCase2000-608.doc

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SUBJECT: FAR Case 2000-608

A. Instructions

1. GENERAL INSTRUCTIONS, PARAGAPH 1: The second sentence indicates that agencies may use Part II as a basis for selecting at least three of the most highly qualified firms *for discussions prior to* requesting submission of Part I. If Part I is to be requested, it should be requested prior to the types of discussions envisioned under the Brooks A-E Law. This is because information contained in Part I may be critical to determining what needs to be discussed with the firms. Ideally (assuming there is no public announcement) the selecting agency would review Part II from more than three firms, and would request Part I from all firms that appeared qualified. The A-E Evaluation Board would then have all the information necessary to make an informed decision in designating three of the firms "most highly qualified" prior to having discussions with the firms.
2. Block 17, Years Experience. Use of word "relevant" in this context is unnecessary and will raise questions as to its meaning, i.e., relevant to architecture or engineering, or a specific type of work.
3. Section F. Last sentence in first paragraph should read "Present *a maximum of* ten projects…"
4. Section H, Block 38: Recommend adding a note similar to the following: "Do not exceed specified maximum number (if any) of pages indicated by selecting agency."

B. SF 330, PART I

1. Block 22, Other Professional Qualifications. This block as currently shown is too small to be useful. Recommend increasing available space by a factor of two to three.
2. Block 23. (4). Relevant Projects, Description. This block is also much too small. There is just not enough space to provide the required information. Amount of space should be doubled.
3. Block 28. Brief Description of Project and Relevance to this Contract. This block is the most seriously short of space. Space available should not be less than is currently available in SF 255, Block 8. The most common type of A-E contract now in use is the Indefinite Delivery Contract (IDC). There is no way to describe, even briefly, the relevance of an IDC in the space currently provided, nor even the average MILCON or Civil Works project. Space should be increased to at least ¾ page. If continuation pages are used and the information is not contiguous, the evaluation boards will waste a great deal of time and effort flipping back and forth between pages. It is therefore essential that at least minimally adequate space be provided in each block.
4. Virtually all firms now use data processing equipment to prepare these submittals. The space problem could be solved by specifying in the instructions that firms may increase the size of certain blocks in order to maintain the contiguous nature of information, providing that agency page limits are observed. Most firms currently increase the size of both Block 7 and Block 8 in SF 255, for the same reasons. This eliminates the need for continuation sheets. Part I should be read like a book, not a newspaper's front page.

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2000-608-42

Professional Engineering Consultants, P.A.

December 14, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

Phone: 202/501-4755

RE: FAR Case 2000-608
SF 330, proposed rule

Dear Ms. Duarte:

The comments contained within this letter and within the attached pages are submitted to support our belief that the proposed changes in Federal Acquisition forms (as referenced above) are counter productive and should be abandoned.

Conversations with Ms. Cecelia Davis, procurement analyst for the effort to implement these changes, indicated that the goal of the proposed rule was to make the process easier, more effective, resulting in better responses and more cost effective selections. She encouraged us to comment as to whether or not this was being accomplished with the proposed rule. We believe <u>not one of the goals has been met.</u>

We have organized our comments according to the topics outlined in the Federal Register.

Section I.	Comments on whether this collection of information is necessary for the proper performance of functions of the FAR, and will have practical utility.
Section II.	Comments on whether our estimate of the public burden of this collection of information is accurate and based on valid assumptions and methodology.
Section III.	Comments on ways to enhance the quality, utility and clarity of the information collected.
Section IV.	Comments on ways in which we can minimize the burden of the collection of information on those who are to respond.
Section V.	Other comments and concerns.

We would specifically like to address the attached documentation of actual and estimated costs for completing the existing and proposed forms (Section II). This includes our actual

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12/17/01

60842

cost of completing SF 254 and 255 forms and a comparison of what we estimate the new forms will require. By our calculations, the amount of time it will take to prepare the proposed form will be at least twenty-five (25) times greater to fifty (50) times greater than what the Federal Register sites as the reporting burden.

This vast difference between what the committee has estimated it takes to complete forms and what it actually takes to prepare the forms, stems from the grossly underestimated figures that the committee began with and which they acknowledge were erroneous.

> "The current SF 254 approved information collection requirement states that it takes 1 hour to complete; and the current SF 255 approved information collection requirement states that it takes 1.2 hours to complete. Experience has shown that these hours are substantially underestimated." *(Federal Register Vol. 66, No. 203/Friday, October 19, 2001/Proposed Rules, Page 53314, Section C.)*

Not only were these numbers substantially underestimated, the committee continues to grossly underestimate the amount of burden required in its proposed Annual Reporting Burden estimates. The register does not indicate how the numbers were estimated and does not provide any evidence of substantiating efforts made to validate the estimates.

It would seem that a system, which has worked relatively well over the past twenty-six (26) years (1975 forward), should not be considered for total replacement with a form that will cause excessive annual reporting burdens. The SF 254 and 255 have resulted in numerous responses and quality projects. The proposed SF 330 form will result in this firm responding to fewer requests and providing less information of value.

In effect, the proposed SF 330 will achieve the opposite effect of selecting from the greatest pools of A-E talent. Instead the government will receive less-qualified contractor responses and fewer numbers of qualified A-E contractors. This appears to be the exact opposite of the committee's stated goals for implementation.

These arguments are further compounded by the FCC Technical Report No. 130 on which the committee based the development of the proposed form. In Part 3 of the report it states,

> "90% of the government and 73% or the private sector are pleased with the current forms." ..."There was a very strong consensus among the respondents that the SF 255 is generally an effective format for presenting A-E qualifications for a specific project." *(Federal Facilities Council Report Number 130, Page 13.)*

According to the conclusions in the Federal Facilities Council Report Number 130 (Page 22) *Survey on the Use of Standard Forms 254 and 255 for Architect-Engineer Qualifications*, the SF 254 and 255 are effective.

> "...This survey also shows that the SF 254 and 255 are effective formats for presenting A-E qualifications... All information on the forms is used by various (procurement) agencies and should be retained."

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The survey further suggested the forms could be improved to enhance their effectiveness, but the report in no way not suggested that the SF 254 and 255 forms should be abandoned and a new form take its place. We contend the committee's goal of ease and effectiveness will not be realized with the proposed SF 330.

Further, we believe this proposed regulation effort entraps industry A-E firms by asking for fees on previously completed projects, and therefore it provides a fee-based scorekeeping mechanism for Federal agencies to procure future contracts. We contend that these provisions, as set forth in the proposed SF 330, violate the *Brooks Architect-Engineer Act (Please see further discussion on this in Section III of this response.)*

If streamlining the forms and reducing the public reporting burden are the goals of the committee, it is our desire to see this proposed rule abandoned. We strongly encourage and advise the FAR Secretariat to seek valid, balanced data thereby gaining input on changes that will accomplish your stated goals and win the support of all of the parties involved in the procurement process.

We invite you to contact our firm for input on real world manhours, costs and work efforts. Our firm encourages the committee to take steps to base their proposed regulations on scientifically obtained data, and if this is not accomplished and communicated to us, we keep our options open for further legislative or legal action.

Respectfully submitted,

PROFESSIONAL ENGINEERING CONSULTANTS, P.A.

John H. Bailey, P.E., Ph.D.
Vice President

Attachments to this letter: Sections I - V
(further technical comments)

CC: Congressmen, Kansas (6)
ACEC, Executive Director
Kansas Consulting Engineers, G. Barbee

608-92

Section I. Comments on whether this collection of information is necessary for the proper performance of FAR, and will have practical utility.

According to the conclusions of in the Federal Facilities Council Report Number 130 (Page 22) *Survey on the Use of Standard Forms 254 and 255 for Architect-Engineer Qualifications*, the SF 254 and 255 are effective.

> "...This survey also shows that the SF 254 and 255 are effective formats for presenting A-E qualifications... All information on the forms is used by various agencies and should be retained."

The survey further suggests that the forms could be improved to enhance their effectiveness, but the report does not suggest that the SF 254 and 255 forms should be abandoned and a new form take their place.

It is our position that the proposed SF 330 stretches far beyond the improvements suggested in the Technical Report Survey. We believe that it is not necessary for the proper performance of the FAR and that it will not have any more practical utility than what is currently available in the SF 254 and 255 forms.

Further, we believe that the proposed SF 330 will add to the A-E reporting burden as demonstrated by our data found in the following section.

Professional Services Fees

The collection of "fee" information or "professional services" information *(Federal Register Vol. 66, No. 203/Friday, October 19, 2001/Proposed Rules, Page 53317, Section F, No. 29 and Page 53325* ***Section F, No. 29 a and b****)* is not necessary for proper performance of FAR functions and will have no practical utility. This data is not necessary nor is it legal. Collection of this information violates the *Brooks Architect-Engineer Act* procurement provisions for obtaining professional services.

As it states in the *Brooks Architect-Engineer Act,* Title 40, Subchapter VI, No. 542 Congressional declaration of policy:

> "The Congress hereby declares it to be the policy of the Federal Government...to negotiate contracts for architectural and engineering services on the basis of demonstrated competence and qualification for the type of services required..."

The *Brooks Architect-Engineer Act* does not say that it is the policy of the Federal Government to negotiate contracts for architectural and engineering services on the basis of fee performance. Asking for fees on professional services will have such effect. We do not support fees included in federal procurement forms and plan legislative and legal action if this is not abandoned.

In the FCC Report No. 130, SF 255 Question 7, Page 17, this comment was made,

> "Clarify whether the estimated cost is the A-E fee or the construction cost."

This comment is not asking for fees to be added to the form. This is asking for clarification. This Clarification could be as simple as eliminating the column titled "Work for Which Firm Was/Is Responsible" *(SF 255, Item 8, Part e)*. It should not include fees because that would lead to selection of firms based on fees rather than qualifications.

608-42

Section II. Comments on whether our estimate of the public burden of this collection of information is accurate and based on valid assumptions and methodology.

In this section, we present our estimates of the public burden of the proposed SF 330. It is our belief, based on our actual calculations that the public burden outlined in the Federal Register are not valid and continues to be grossly underestimated.

Annual Reporting Burden Estimates
Our numbers prove the committee's Annual Reporting Burden to be grossly underestimated. We have been producing SF 254 and 255 submittals for more than 25 years and are able to supply the committee with actual production costs. Please see Section II, Exhibits A & B of this section.

If the proposed SF 330, Part I proposed rule is implemented, it will require our staff slightly more than twice the current effort to accomplish the same task. (Refer to Section II, Exhibit A.) It currently takes our staff 39 hours to complete the SF 255 versus the 85 hours it would take to complete the proposed SF 330.

With regard to the annual reporting burden on the proposed Standard Form 330, Part II, we estimate, after a learning period (during which time, the Part II production would require perhaps as much as double our estimate), we will invest at least 143 hours per year in the completion and compilation of the data necessary for this annual pre-qualification form (Please see Section II, Exhibit B). Presently, we spend fifty-seven hours to complete the SF 254. This is 57 times greater effort than the current SF 254 requirement estimates of 1.0 hours.

The committee's estimates alone indicate that a 400% greater effort will be required between the current SF 254 form and the proposed Part II, SF 330 (1.0 hours versus 4.0 hours). How is it possible to increase an estimate of effort by 400% and not feel that it is significant burden?

Not only are these numbers substantially underestimated, the committee continues to grossly underestimate the amount of burden required in its proposed Annual Reporting Burden estimates. The register does not indicate how the numbers were estimated and does not provide any evidence of substantiating efforts made to validate the estimates.

It would seem that a system, which has worked relatively well over the past twenty-six (26) years (1975 forward), should not be considered for total replacement with a form that will cause excessive annual reporting burdens. The SF 254 and 255 have resulted in numerous responses and quality projects. The proposed SF 330 form will result in this firm responding to fewer requests and providing less information of value.

In effect, the proposed SF 330 will achieve the opposite effect of selecting from the greatest pools of A-E talent. Instead the government will receive less-qualified A-E contractor responses and fewer numbers of qualified A-E contractors. This appears to be the exact opposite of the committee's stated goals for implementation.

608-42

Survey Method
As demonstrated by our calculations and based on the survey method outlined in the Technical Report No. 130, we believe that the numbers estimated by the committee are based on invalid assumptions and methodology.

The survey on which the ad hoc committee based its proposed rule assumptions was unfairly weighted toward federal agencies. "188 from Federal agencies and 56 from A-E firms."(*Federal Facilities Council Report Number 130, Page 3.)* Not only was the data used unbalanced, it was not controlled by the standing committee. This is demonstrated by the Technical Reports description of its Survey Method.

> "In some agencies only one consolidated response was requested from a field activity. Other agencies allowed individuals to respond, resulting in many responses from a single activity."

How can this data be considered valid? There is no scientific or analytical basis for it to be valid. On this point alone, the committee should abandon its proposed rule and conduct valid scientifically based research on how the existing forms are performing and how, if any, modifications are needed. Perhaps this study would find that no improvements are needed at all.

Other SF 254 –255 Miss-conceptions
More erroneous data was found in SF 254 Question 3 in Technical Report 130, "Is the 254 effective for your purposes?" (*Federal Facilities Council Report Number 130, Page 5 & 6.)* In the Synopsis of Comments, it states that the "Private sector A-E firms commented that they often 'tailor' a SF 254 for a specific project announcement." It is our understanding that this is a misuse of the SF 254 on the part of these A-E firms and in all the years that we have prepared SF 254 and 255, we have never practiced tailoring our 254 to a specific project.

In a casual poll of our colleagues on the matter, they agreed that they did not change their SF 254 from one project to the next, but understood that was the job of the SF 255. Though we do resubmit the SF 254 with a SF 255, we do not alter or change the SF 254 from the form that is originally sent annually to the A-E Contract Administration Support System (ACASS) maintained by the Army Corps of Engineers.

Perhaps this problem would be better served with a clarification on what the SF 254 is and how it should be used. Is the SF 254 a picture of the total firm, kept on file for agencies to use to evaluate qualified firms for projects at or below the simplified acquisition threshold or is it a document that spoon feeds the agency what it wants to hear? What kind of information do the agencies want? More importantly, what kind of information does the industry wish to portray in terms of qualifications and competency?

608-42

SECTION II, EXHIBIT A

ANNUAL REPORTING BURDEN

INDIVIDUAL PROJECT RESPONSE ISSUES

Considering data on responses from the most recent three (3) years, our firm has responded to seventeen (17) federal level solicitations from various federal agencies either as a prime or as a sub-consultant. In terms of annual reporting burden the data below would require multiplication by a factor of 17.

SF 255 FORM - *Existing Form*

	PEC Estimates		Government Estimates	
	Hours	Cost*	Hours	Cost*
As Prime	39.0	$2,028.	1.2	$62.40
As Sub-Consultant	15.6	$812.	not addressed	

SF 330, PART I FORM - *Proposed Form*

	PEC Estimates		Government Estimates	
	Hours	Cost*	Hours	Cost*
As Prime	85.0	$4,420.	25.0	$1,300.
As Sub-Consultant	65.0	$3,380.	not addressed	

* $52.00 per hour was used as cost factor for both PEC and Government Cost Estimates. Cost includes hourly wage plus benefits/overhead.

The above costs estimates do not reflect the manhours and costs associated with learning the proposed SF 330 form. The learning curve costs will be significant. Costs of developing the proposed SF 330 were also not factored in the Costs estimates. These costs would include paying for the re-design of the electronic forms and any training available.

We have no real life experience on which to estimate the burden that will be caused during the initial learning curve or the re-design of the proposed SF 330 form to fit within our already established electronic format.

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SECTION II, EXHIBIT B

ANNUAL REPORTING BURDEN

ANNUAL PREQUALIFICATION ISSUES

SF 254 Form - ***Existing Form***

	PEC Estimates		**Government Estimates**	
	Hours	**Cost***	**Hours**	**Cost***
Annual Submittal	57.0	$2,964.	1.0	$52.

SF 330, Part II Form - ***Proposed Form***

	PEC Estimates		**Government Estimates**	
	Hours	**Cost***	**Hours**	**Cost***
Annual Submittal	143.0	$7,436.	4.0	$208.

* $52.00 per hour was used as cost factor for both PEC and Government Cost Estimates. Cost includes hourly wage plus benefits/overhead.

The above costs estimates do not reflect the manhours and costs associated with learning the proposed SF 330 form. The learning curve costs will be significant. The costs of developing the proposed SF 330 were also not factored in the costs estimates. These costs would include paying for the re-design of the electronic forms and any training available for our staff members.

The reduction of profile code response categories from the presently allowed field of 30 codes to 20, along with the addition of 31 (From 117 to 148) possible profile code categories, will consume many hours of deliberation and data re-coding.

We have no real life experience on which to estimate the burden that will be caused during the initial learning curve or the re-design of the proposed SF 330 form to fit within our already established electronic format.

608-42

Section III. Comments on ways to enhance the quality, utility and clarity of the information collected.

In this section, we present several specific issues that need clarification. Though we believe that the whole idea of the SF 330 should be scraped until more scientifically valid basis can be used for its inception, we have decided to include specific issues that were glaringly misleading, confusing or needed to be addressed with the proposed SF 330 form.

SF 330, PART I – SPECIFIC QUALITY AND CLARITY CONCERNS

Branch Office Issue

On page 53314 of the Federal Register Proposed Rule FAR Case 2000-608, it states that the proposed rule eliminates information of marginal value such as lists of all offices of a firm. However, Part I states several times within its structure, "If a firm has branch offices, complete this section for the particular branch office(s) proposed for the contract." This complicates completing the Part I portion of the proposed SF 330 and presents many questions.

- Does each branch office have to fill out a Part II to be turned in annually or to be turned in for each specific project contract?
- Is the purpose of Part II (254) to get a view of the company as a whole?
- Do the government agencies want the whole picture or part of the picture?
- Would the submitting firm have to include the requested information for each branch office?
- Isn't asking for information in another place, not eliminating it at all?
- Would a team be scored lower for having their team in different locations? And wouldn't that cause a firm to limit the pool of personnel that would work on a specific project. This would limit the agency from receiving the best-qualified personnel as part of the team.
- Could this information be better served in the resume section of the form?

According to the definition for Branch Office: "A geographically distinct place of business or subsidiary office of a firm that is part of the proposed team." This definition suggests that each office will have to be identified separately. This information is asked for in Part I, Section C, Proposed Team.

In an attempt to use the proposed SF 330 form, we discovered that our firm would have to include four separate addresses for our firm alone. We had put together a project specific team of experts for the project. When developing a team, we draw from all of our offices to match the project with the best-qualified personnel. Because our offices are located in one state, geographic locations are not at issue for us. But we understand the larger firms with more diverse office locations, would be limiting their pool of experts. Thereby not providing the best personnel for the project.

608-42

Part I, Section E of the proposed SF 330
versus Item 7 of the SF 255

Through the attempt to make it more electronic friendly the proposed form is inflexible and limits the firm from representing a true picture of its employees.

Our firm has been using an electronic database for filling out 255 & 254's since 1990. We have found that while a certain amount of data blocks are necessary, too many data blocks limit the design, flexibility and adaptability. It is necessary to have a degree of flexibility in the form design to allow for electronic use. Too many data blocks inhibit the form; they do not enhance it.

There is not enough room for multiple education entries. Personnel with Doctorate degrees would not be accurately represented. The same holds true for multiple licenses held by a professional presented for a project.

Unlike the SF 255, the proposed SF 330 leaves little space for elaborating on specialized experience, type of clients served, and limits relevant projects to five. This does not portray a complete portrait of personnel, like the SF 255, Item 7.

To illustrate this, we attempted to complete the proposed SF 330, Part I, Section E for one of our employees and the subsequent Item 7 of the SF 255 currently in use. The picture presented in the proposed SF 330 is not the same as what exists in the SF 255. The proposed SF 330 does not capture the complete picture and the new form does a disservice to the review Federal Agencies.

Part I, Section F of the proposed SF 330
versus Item 8 of the SF 255

Fees

We have discussed fees in previous sections of this comment submittal. In this section, we present that the confusion associated with naming fees alone is a basis for abandoning their requirement in the proposed SF 330.

How will fees be defined? Are they design fees alone? Are they design and construction administration fees? Are they design plus any ancillary service (survey, geology, special studies, feasibility determinations, etc)? Each project dictates a host of fee-based issues and concerns that cannot and should not be part of an A-E qualification process for any type of A-E selection. The relative nature of contracting fees contributes to this phenomenon. There are four to five ways of negotiating fee types. Asking for fees allows comparative price shopping, not the selection of the most qualified firm for the job. The *Brooks Architect-Engineer Act* is clearly violated by this "un-defined" request for fees.

As it states in the *Brooks Architect-Engineer Act,* Title 40, Subchapter VI, No. 542 Congressional declaration of policy:

> "The Congress hereby declares it to be the policy of the Federal Government…to negotiate contracts for architectural and engineering services on the basis of demonstrated competence and qualification for the type of services required…"

608-92

Federal agencies should be selecting professional services "...on the basis of demonstrated competence and qualification," NOT FEES. We contend that this language prohibits fees or cost of A-E services from consideration.

Example Projects

The proposed SF 330 is not clear about whether 10 example projects from sub-consultants will need to be submitted or if a certain number of the 10 projects should include example projects from sub-consultants. This needs clarifying and brings up other questions.

If sub-consultants do submit, does that mean 10 example project pages from each sub? What if the submittal has 5 subs or 8 subs, if you have to include each Branch Office Example Project list? Do the Federal Agencies want 80 sheets of paper for Section E?

If only the prime's example projects are used, that would not provide a complete picture of the team's experience. It would leave out experience that Federal Agencies will want to consider. For example, a project that requires a specialized service might require a specialized sub-consultant with which few prime firms have ever worked. Their experience would not be included in the 10 example projects and might be overlooked in the agencies' scorekeeping. This would eliminate qualified firms from consideration and limit the number of firms in the pool.

The Example Projects Section F, No. 31 asks for team members who worked on this project. In some instances more than adequate space is provided for this, for other situations there is not enough room. This information is repeatedly requested in the proposed form SF 330 and is extraneous and should not be included on the proposed form. It does NOT reflect the prime respondent's experience.

No. 31 is merely a scorekeeping mechanism. It is a database nightmare that will create significant expense to submitting parties' reporting burden. It is redundant. Perhaps this space could be used for project description, awards, additional project information and photos? This would eliminate the need for the photo check box included throughout the form and would reduce the amount of paper required for submittals.

The Example Projects Section F, No. 32 indicates space for awards, but not much. Exemplary projects often win many awards. Why provide so much space for the "Firms from Section C Involved with This Project (No. 31)." Subsequently, the "Additional Project Information (No. 32)" data field is grossly inadequate, makes little sense and should not be included. Additional information could be included in the description area, if more space could be reserved for it.

Part I, Section G of the proposed SF 330
Key Personnel Participation in Example Projects

Data blocks don't match previous data block sizes, causing database maintenance problems. The exercise of completing this Section was painful and confusing, especially Section G, No. 36. Little guidance is given for defining participation and the form leaves the submitter baffled at is purpose. Compilation of the matrix alone, which is a scorekeeping exercise and database anomaly, is redundant and time consuming. Of all the components in Part I of the SF 330, the matrix page creates the greatest annual reporting burden.

608-42

SF 330, PART II – SPECIFIC QUALITY AND CLARITY CONCERNS

Part II Profile Codes
Only being allowed twenty (20) profile experience codes and one page to portray a firm's general qualifications is extremely limiting. This will result in much too narrow of a definition for defining a firm's true qualifications to offer services.

To further compound this problem the committee increased the number of profile codes from which to define your company's scope. Increasing the number of profile codes and limiting the number allowed to report limits the power of the submitting firm to define itself.

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Section IV. Comments on ways in which we can minimize the burden of the collection of information on those who are to respond.

In this section, we present several specific issues that address minimizing the burden of the collection of information on those who are to respond to the proposed SF 330. Though we believe that the Proposed Rule SF 330 should be abandoned, we have decided to include specific issues that overwhelmingly increase the burden of collection with the proposed SF 330 form.

SF 330, PART I – SPECIFIC BURDEN OF COLLECTION CONCERNS

Part I, Section E of the proposed SF 330
versus Item 7 of the SF 255

Redundant Information Request & Spacing
The proposed SF 330, Section E repeats information, in abbreviated form, that is also provided in Part F & G. Not only is this redundant and unnecessary, it adds to the burden of reporting and because the spaces are different from one section to the next, it is not conducive to electronic reporting of the data.

To demonstrate – the project title space in Section E of the proposed SF 330 is about one-fourth the size of the project title space in Section F. This would require our electronic database to have two data blocks and two separate titles for the same project. The project title is repeated again in Section G with an entirely different space requirement.

This same problem exists with the project description (SF 330, Part I, Section E, No. 23, a, 4) asked for in Section E and the space available for the project description asked for in Section F (SF 330, Part I, Section F, No. 28). Minimize the burden of collection by

Part I, Section F of the proposed SF 330
versus Item 8 of the SF 255

References
Understanding that asking for email and fax presents a more convenient way for Federal Agencies to contact professional references, we believe that this is an invasion of the privacy of our clients who agreed to be our references. This invasion of politeness would require us to contact references and ask permission to use their email again adding to our burden of reporting. This should be stricken from the form.

Project Description
This differs from the SF 255, Item 8 in that the Item 8 asked for "Nature of Firm's Responsibility." We have more than 3000 projects in our project database that we monitor and have adjusted to fit the SF 255 style of reporting. All of these projects will have to be re-researched to provide all the information proposed in the SF 330.

> "Indicate scope, size, cost, principal elements and special features of the project." *(Federal Register/Vol. 6, No. 203/Friday, October 19, 2001/Proposed Rules/Page 53317/Section C No. 28)*

Just imagining the manhours and cost of this task alone is astronomical.

608-42

Photo Submission
The proposed SF 330 leaves less space for project description and photos. Though it asks for more information, it provides less space to provide that information. Photos of projects are requested separately. Why not provide that space within the form. Database software packages include photo insertion capabilities. Photos provided separately, greatly adds to the amount of paper *(Please see the discussion of the amount of paper in Section III, SF 330, Part I, Section F, Example Projects of the Comment Submittal).* The amount of paper poses problems when agencies place limits on the number of pages that can be submitted for a project.

Example Projects Design Flexibility
The Proposed SF 330 does not allow for a one-page submission of example projects. This is the answer to the amount of paper and reporting burden. The existing SF 255 allowed firms the flexibility to send a one-page example project list. If the submission called for a one-page project list, the prime firm submitted 10 projects on one-page each. The sub-consultants for the submission then provided 10 projects on one-page. This flexibility allows the submittals to be manageable and eliminates the amount of paper burden that the SF 330 proposes.

608-42

Section V. Synopsis of Concerns

1. Comment Period Extension
The FAR Secretariat should extend the comment period by at least thirty (30) days, and perhaps sixty (60) days to allow sufficient time for input from the private sector architectural-engineering community that will be affected dramatically by the proposed rulemaking and proposed SF330 form implementation. Please extend the deadline to at least January 18, 2002, or if possible extend the deadline to February 18, 2002.

2. Requesting Fees
Requesting fees in the proposed SF 330 allows comparative shopping based on fees and not qualifications on the part of the Government. There are at four and some firm's have five ways of negotiating fee types. This would allow the forms to compare what cannot be compared.

The proposed SF 330 offers NO definition of fees (design only; design + administration; design plus any Ancillary services such as survey or geology; construction inspection services).

We believe that this proposed regulation effort entraps industry A-E firms by asking for fees and provides a scorekeeping mechanism for Federal agencies to procure contracts. We contend that these provisions, as set forth in the proposed SF 330, violate the *Brooks Architect-Engineer Act (Please see further discussion on this in Section III of this response.)*

3. The Survey Method & Ad Hoc Committee Composition
The survey on which the ad hoc committee based its proposed rule assumptions was unfairly weighted toward federal agencies. Not only was the data used unbalanced, it was not controlled by the standing committee.

How can this data be considered valid? There is no scientific or analytical basis for it to be valid. On this point alone, the committee should abandon its proposed rule and conduct valid scientifically based research on how the existing forms are performing and how, if any, modifications are needed. Perhaps this study would find that no improvements are needed at all.

Further the ad hoc committee that created the proposed rule consists of three individuals. Federal Agency representatives, who it is possible, have never completed a procurement form. Private-sector industry professionals should be represented in the committee, not just asked to comment.

3. Key Personnel Participation in Example Projects (SF 330, Part I, Section G)
This Form is redundant and an oversimplified scorekeeping mechanism that will perform administrative selection duties for the Federal Agencies. It is our belief that Federal Agency procurement officers are supposed to be examining qualifications, not reading a pre-prepared scorekeeping sheet like this matrix.

The matrix form is:

- Extremely difficult to gather data;
- Extremely confining in terms of depicting relevancy to project under consideration due to prior team assignment; and

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- Redundant in that the A/E firm is expected to score and summarize data that is already contained in other pages of the Part I, SF 330.

4. Significantly More Paper
The way the proposed SF 330 form is designed and defined creates more paper, not less. When one sheet, plus photo sheet, are requested for each project submitted, it creates more paper than the present SF255 Form. The lack of definition and flexibility of the proposed SF 330, Part I, Section F makes the amount of paper that could be submitted, such as in the case of a number of sub-consultants, mind boggling.

5. Substantially More Public Reporting Burden
The public reporting burden is substantial and significant. It will be more costly to be considered for A-E selection as a result of implementing the proposed SF 330. When the cost of submitting rises and the potential for profit lowers, firms will consider it less profitable to submit for government work and the pool from which the Federal Agencies will decrease. Without the competition the Federal Agencies will end up paying more for A-E professional services.

6. Transitional Costs
Only three (3) primary Federal Agencies (Department of Defense, General Services Administration, and National Aeronautics and Space Administration) worked on this proposed rule. Only one representative from each of these agencies sat on the committee for this proposed rule. Not one representative from the private sector, who actually completes government submittals, was involved in the committee efforts.

The committee's decisions will have rippling effect on other federal agency levels and departments; not to mention that many of the states in the United States subscribe to the use of the SF 254 and SF 255 formats for methods at the state project selection levels. We see no guidance or oversight to cause a simultaneous transition. Consequently, for many years, possibly as many as five (5) years, the A-E industry will be saddled with completing both SF 254s, 255s and 330s, as well as undue duplication and transitional costs that are overwhelming.

7. Branch Office Issue
On page 53314 of the Federal Register Proposed Rule FAR Case 2000-608, it states that the proposed rule eliminates information of marginal value such as lists of all offices of a firm. However, Part I states several times within its structure, "If a firm has branch offices, complete this section for the particular branch office(s) proposed for the contract. This complicates completing the Part I portion of the proposed SF 330.

Under the proposed Part II SF330 Form it will be possible to complete the annual pre-qualification materials for each of a firm's branch offices; however, in so doing the firm will fragment the receipt and response to project solicitations due to the address and contact person being different for each branch office. The branch office can only submit the profile codes and project experience performed by that branch office. We believe this limits the ability of firms to provide a true picture of their capabilities and to select a team from a large pool of experts from different offices.

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8. Part II Profile Codes

Only being allowed twenty (20) profile experience codes and one page to portray a firm's general qualifications is extremely limiting. This will result in much too narrow of a definition for defining a firm's true qualifications to offer services.

To further compound this problem the committee increased the number of profile codes from which to define your company's scope. Increasing the number of profile codes and limiting the number allowed to report limits the power of the submitting firm to define itself.

2000-608-43

"Kay Rutter"
<krutter@mecompanies.com>

12/17/2001 02:12 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: Comments re: FAR case 2000-608

Dear General Services Administration:

I have reviewed the draft SF 330 and appreciate the efforts to streamline the process and the data collection. I fully support the use of a single form; however, I don't think even this reduced format will substantially reduce the paperwork burden for A/E firms.

Comments:
Definition of Disciplines and Experience Categories would be appreciated.

The type is small and hard to read, and it seems that many of the boxes are way too small for the information requested, especially using a typewriter. Even if the form is automated, it still may require using a tiny font to fit in the details.

Examples: Part 1B, #10 - Fax number
Part 1E, #22 - Other qualifications
Part 1E, #23 (4) - Description
Part 1F, #32 & #33
Part 1G, #34 & 35

Part 1D needs more definition as well--I'm confused as to whether to supply one overall organization chart or one chart for everyone involved (annotating who belongs to which company), or to segregate by company and/or location involved.

Part 1F: I like the 1 sheet / project concept, but pictures should be included on that page, not as additional sheets--consultants will begin adding 1-page marketing pieces and calling them the "photographs."

Also, the project pages need to have a numbering system so that they can be easily cross-referenced with the example project columns on Part 1G #36. Even though the projects are numbered in #37 at the bottom of Part 1G, others might do as I did and overlook that section until finished reading #34-36.

Will consultants be permitted to include multiple pages of Part 1H #38 (Additional Information)?

KayAnn Taylor Rutter
Marketing Manager
M-E Companies, Inc.
(614) 818-4900 ext. 307

2000-608-44

"Herlihy, Jean M." <jherlihy@GFNET.com>

12/17/2001 10:59 AM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc: "Zimmerman, Jere D." <jzimmerman@GFNET.com>
Subject: FAR Case 2000-608

Laurie Duarte:

Please consider the attached comments regarding the new SF 330.

Thank You.

Gannett Fleming, Inc.
202 Senate Avenue
Camp Hill, PA 17011
Jean Herlihy
Environmental Resources Business Development
717-763-7211ext. 2618

<<Draft SF 330.pdf>>

- Draft SF 330.pdf

December 17, 2001

Comments on Draft SF 330, Architect-Engineer Qualifications Federal Register Vol. 66, No. 203/Friday, October 19, 2001/Proposed Rules

608-44

General Comments

1. Will this form be available electronically in Microsoft Word/Word Perfect format, similar to the SF 254/255?

2. If available electronically, how flexible are the fields? Are there character limitations per field? Can fields (or data blocks) be removed to provide for others to be enlarged or added to if we need to get more info into the form?

3. Page 53316 of the Federal Register, Item 1 under GENERAL INSTRUCTIONS: the last line in the last paragraph states "If a firm has branch offices, submit a separate Part II for each branch office seeking work." If proposed personnel for a contract are located in multiple branch offices, must a separate Part II be submitted for each office?

Specific Comments

1. Regarding the List of Disciplines (Function Codes):

    a) Consider a mechanism to identify additional discipline(s) at the proposer's discretion.
    b) At a minimum, the following disciplines should be added: Archaeologists, Hydraulic Engineers, Sanitary Engineers, Geophysicists.
    c) Replace Engineer Code 23 Foundation/Geotechnical, and 30 Soils with Geotechnical (Foundation/Soils)

2. Regarding the List of Experience Categories (Profile Codes), add a category "Geophysical Studies"

3. Regarding Part I, Section E. to what extent are the fields flexible? Is the intent to keep this form to one printed page per person?

4. Regarding Part I, Section F, to what extent is field 28 (description) flexible? Responding to multi-discipline IDCs, with a very limited field and a ten-project description limit would be very difficult. Is the intent to promote larger Project Teams with more specialized capabilities of each team member?

5. Regarding Part II, will proposers be limited to 20 disciplines (i.e. 20 lines within field 9)? Larger firms will likely have more than 20 disciplines, and may have personnel classified within nearly all of the 52 for the List of Disciplines. Refer to specific Comment no. 1, above.

6. Regarding Part II, is it the intention for proposers to select the Experience Categories that constitute the largest component of work for the firm, or categories that are most appropriate for the specific contract being sought? Larger firms may have significant experience in more than 20 categories.

2000-608-45

"Molly M. Maguire" <mmaguire@schemmer.com>

12/18/2001 11:36 AM

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR Case 2000-608

Attached are our comments on the SF 330 draft. We appreciate the opportunity to review the draft and look forward to the implementation of the final version.

What is the target date for implementation?
thanks.

Molly M. Maguire (mmaguire@schemmer.com)
The Schemmer Associates Inc.
Architects-Engineers
1044 N. 115th St. Suite 300
Omaha, NE 68154-4436
(402) 493-4800 - phone
(402) 493-7951 - fax

- sf 330.doc

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- Part I

1. Page 10 – Examploe of projects. Is there a limit to the length of the description of project?

2. H – Additional Information. Do you want a signature at the bottom of the 1st page with additional pages attached as you state or signature at the end of Section h even if there is more than one page?

3. When would photos be requested?

4. Is there a font guidline (size or style – 10 pt. or any smaller okay??)

- Part II

1. If prequalifications are submitted yearly (it sounds like we have a choice?):
   a. is there a date preferred for this submittal?
   b. is there a list of agencies who need this on file? Can we get that list?
2. Are projects in Part II:
   a. Customized to each RFP? or,
   b. done as they are now on a once-a-year basis? (It sounds like they are done every time, but could be done yearly also....confusing.)
   c. or both??

- You estimate Part 1 to take 25 hours and Part II to take 4 hours. We think this is conservative.

- Will samples be posted somewhere so that we can properly pattern after them?

ALSO:
1. In the header of page 53316, it talks about the public burden for completing the form. I am unclear if we are to comment on the validity of the 29 hours to complete for Part 1. Don't know how the number was derived. It seems low, and will vary greatly with the size complexity and composition of the team required.

2. The page number/total pages will be a pain. We recommend that this be LEFT OUT.

3. Page 53317, Section D. Organizational Chart. Is it supposed to have a sequential page number also?

4. Item 23 on Part 1, Relevant Projects. Item (4) of a, b, c, etc. The space to describe the project is tiny. Are we allowed to re-draw and expand the block. A question would be if this were permissible? Also in this Item (4) one can

608-45

check for photo, which it seems can be confused with Item 27, block 28 check for photo.

5. Keeping photos straight and referenced between prime and subconsultants related to Item 4 will be a struggle to keep clear.

6. Item 23, Part 1, a, b, c, etc. instructions limit to five projects per key personnel resume.

7. Item H, 38, now becomes the old Item 10 from SF 254, correct?

8. Is the new form going to be available in electronic format? What application software?

2000-608-46

"Herring, Ricardo (OD/ORS)" <herringr@ors.od.nih.gov>

12/17/2001 04:15 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: SF 330 Architect - Engineer Qualifications

To Ms. Laurie Duarte:

I am please to submit my comments on the proposed SF 330 for your consideration.

<<SF 330 Comments.doc>>

Ricardo C. Herring, FAIA

- SF 330 Comments.doc

608-46

December 17, 2001

Laurie Duarte
General Services Administration,
FAR Secretariat (MVP)
1800 F Street, NW
Room 4035
Washington, DC 20405

Subject: Standard Form 330 Architect – Engineer Qualifications FAR case 2000-608

Dear Ms. Duarte:

Thank you for the opportunity to review the proposed Standard Form 330 (SF 330) and offer the following comments.

> *Consider Equal Employment Opportunity as a selection criterion for the following reasons:* Affirmative Action is a performance requirement of Federal contracts under Executive Order 11246 or FAR 22.8- Equal Employment Opportunity (Contract Compliance). Sub Contracting Plans are used to enforce the equal opportunity provisions of the FAR. However, A/E selection is based on qualification it is difficult to require a subcontracting plan after you selected the highest qualified firm based on their proposed team that includes subcontractors.

I recommend Section H be change to Equal Employment Opportunity and a new section be added (I) Additional Information.

Again thank you for the opportunity to comment on SF 330 and if I can be of further assistance please do not hesitate to call me (301) 402-2048.

Sincerely

Ricardo C. Herring, FAIA
Senior Architect
Design, Construction and Alteration Branch, TRG
Division of Engineering Services, ORS
National Institutes of Health

2000-608-47

"Jacquelyn Schingeck" <jschingeck@centuryeng.com>

12/17/2001 04:29 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR Case 2000-608 Comments

Thank you for allowing us the opporunity to comment on the proposed Standard Form 330.

- SF 330.doc

608-49

December 17, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW
Room 4035
Washington, D.C. 20405

ATTN: Laurie Duarte

RE: FAR Case 2000-608

Ladies and Gentlemen:

Century Engineering, Inc. offers below our comments concerning the draft of the Standard Form 330 for use in the selection of Architect-Engineer Contractors.

Part I, Contract Specific Qualifications:

Page Number and Total Pages: In most cases, the majority of the proposal will be completed with two exceptions – information has not arrived from subconsultants and the supplemental information is still being written. The requirement to have each page numbered and indicating the page total prevents any part of the proposal from being finalized and printed without having the proposal 100% completed. Would it be possible to have the total number of pages on the first page only?

Firms from Section C Involved With This Project: We appreciate the value of prior working experience between team members however, we feel that this hampers expanding our relationships with minority firms and small businesses. If a firm is newly formed and the principal worked on a project at his/her prior place of employment, can this be considered? Can positive consideration be given if the new relationship is with a small or disadvantaged business?

Names of Key Personnel and Role in this Contract: This requirement makes it difficult for a newly hired senior staff member to be submitted on projects in a key role for a significant amount of time. Since the projects submitted are examples of the work performed by the firm, a newly hired individual would not have played a role in that project. Since most agencies prefer the submission of projects that are completed in order to acquire reference information, it could be several years before this individual would have any completed projects to contribute. This requirement makes it difficult to replace and/or add senior level staff and utilize them in key roles.

2000-608-47

Part II, General Qualifications:

If a firm is multi-discipline providing more than one discipline on a particular submission, is Part II required for each discipline as well as each branch office?

We appreciate the opportunity to comment on this proposed Standard Form 330.

2000-608-48

"Robert Irwin"
<RIrwin@HNTB.com>
12/17/2001 06:28 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: Attn Laurie Duarte

Ms. Duarte,
Please find attached our responses to the SF 300 form.

<<final comments.doc>>

Robert Irwin
Marketing Manager, Information
Corporate Marketing Services

HNTB
816.527.2733 / RIrwin@hntb.com / fax 816.472.5004
715 Kirk Drive * Kansas City MO * 64105

- final comments.doc

608-48

HNTB
715 Kirk Drive
Kansas City MO 64105
FAR case 2000-608

Comments concerning the proposed SF330 form

Tuesday, December 18, 2001

Dear Laurie Duarte,

Below you will find comments concerning the proposed SF330 form. Individuals who currently work on our SF254 provided their comments either through emails or, as you will note, directly on the form.

Sincerely,

Robert Irwin
Marketing Manager
HNTB

COMMENTS ON NEW FEDERAL FORM SF - 330

E. DEHN 11/30/01

1. At first glance the new form appears to be an oversimplification of the old SF-254/255 forms. On closer inspection there seems to be some real good material for quick comparison of firms responding to a given CBD announcement.

2. The new profile code numbering system is going to be a problem for awhile until everyone can cross-reference from one to the other. The old system started with 001 and was numbered consecutively. The new system starts with A01—, B01—, C01—, etc., based on the first letter of the description for each profile code.

3. The "Discipline Function Codes" are greatly improved! No more nebulous terms like "estimators", "spec writers", etc. Now, everyone fits neatly in to a specific discipline. All engineers do their own estimates and specifications.

4. The matrix of key people, Part I, Section G, has been used by LANTDIVNAVFAC for many years. It does a good job of graphically identifying proposed project team member's roles on the representative projects listed. Our task force action item for developing DOD style resumes should give us some good info for this on particular responses.

5. Part I, Section E, the new team resume forms, are much too compressed! Too much info & not enough room. Especially true for Section 22 – "Other Professional Qualifications". Will they allow an extended resume for key people or are we stuck with the one page?

6. Part I, Section H is comparable to the old SF-255, Section 10.

7. Part II, which is intended to replace the old SF-254 is going to be quite cumbersome in that they want a Part II filled out for each office seeking work. If we look at the Savannah Corps of Engineers as an example, we may need to submit a dozen Part II forms to cover all our offices within their area of jurisdiction or, having special services to offer that could be of interest.

8. Part II form should have a space for the firms "ACASS" number.

9. Part II, Section 10 will be very long + difficult to figure the dollar value of all the profile codes that may apply to a particular project. And, don't forget, this will need to be done for each office!

10. Part II, Section 10 does not identify the "firms role" on projects listed, i.e., prime, sub, JV, etc. Many firms (DBE & small businesses in particular) are predominantly subconsultants and do not serve as the prime firm on their projects. The form as it stands does not make the distinction of the firms role as the old SF-254 used to.

It is definitely more in depth. There will be a lot of research and databasing on our part to keep up with new information required (roles individuals held on specific projects, firms involved in specific projects) but it does give an opportunity to show which individuals participated in included projects.

I think that it is more concise and to the point.

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1. Overall, the form is not user friendly; I wouldn't want the be the reviewer. It looks as if they are trying to cram as much info as possible into as small a space as possible. I personally find this much harder to review.

2. Resumes and Projects are on the same page; this will be cumbersome for the reviewer. Some consultants will try to add boxes, some will add pages, it will be hard to compare apples to apples.

3. The layout of the boxes is not organized in a way that is easy to fill in or easy to follow. I agree with the comments below regarding the images check box and attaching images.

4. It looks like they are combining the 254 and 255 in no apparent order; this form is not an improvement over the existing 254 255, in fact, as a reviewer, I think it is much more difficult to use. The benefit of the current 2-form system is the 254 can include standard background info, while the 255 is project specific. The 330 skips back and forth between the 2.

5. Not sure what the benefit of the new form is.

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1. The SF330 leaves us much less room for creativity (space-wise) and innovation in the way we present our qualifications. Uses lots of tables instead of the current Section 7 and 8s, which have form info at the top and leave most of the page blank. On the positive side it makes things easier, but it also makes it more difficult to differentiate us from our competitors.

2. SF330 does make it much easier on the reviewer to score firms (i.e. requires a matrix cross-referencing people with projects)

3. A question I have is - Is Part I required to be prepared by all members of a team (as the 255 is required to be prepared by all members of the team for Caltrans and some gov't agencies). If so, this will most likely place a burden on large firms to help smaller firms prepare the SF330

2000-608-49

"Bammann, Christina"
<cbammann@webster
.wilbursmith.com>

12/18/2001 09:43 AM
Please respond to
cbammann

To: farcase.2000-608@gsa.gov
cc: JSalmond@wilbursmith.com
Subject: Laurie Duarte-SF300

Please see the attached for comments regarding SF330.

- additions to the List of Diciplines.doc

2000-608-49

December 18, 2001

Ms. Laurie Duarte
General Services Administration
1800 F Street, NW
Room 4035
Washington, DC 20405

Re: FAR to Replace SF254 with SF330- New Consolidated form for selection of A/E Contractors; Proposed Rule

Dear Ms. Duarte:

We have reviewed the proposed rule and respectfully submit the following disciplines for your consideration and possible addition to the proposed List of Disciplines (Function Codes):

<u>Engineers</u>

- Highway
- Construction
- Hydraulic
- Seismic
- Sanitary

We acknowledge, as indicated in the directions, that additional disciplines may be added after the listed disciplines, but recommend that the above be added among the primary disciplines/ functions.

Respectfully,

Jasper Salmond
Principal Associate
Wilbur Smith Associates

IT Corporation
312 Directors Drive
Knoxville, TN 37923-4799
Tel. 423.690.3211
Fax. 423.690.3626

A Member of The IT Group

2000-60850

December 17, 2001

General Services Administration,
FAR Secretariat (MVP)
1800 Front Street, NW
Room 4035
ATTN: Laurie Duarte
Washington DC, 20405

Dear Ms. Duarte:

REF: IT Corporation's Comments on Federal Acquisition Regulation; New Consolidated Form for Selection of Architect-Engineer Contractors, 48 CFR Parts 1, 36, and 53, Proposed Rule [Page 53314]

IT Corporation, one of the country's leading supplier of environmental consulting and construction services, is pleased to comment on the proposed rule for the "New Consolidated Form for Selection of Architect-Engineer Contractors", SF 330, Architect-Engineer Qualifications. Our specific comments are enclosed.

Generally, we find the rulemaking does not meet the intent to limit the submission length of the existing SF254 and SF255 forms. We believe the estimate to complete the proposed SF330 Part I form is about 60 hours (not the 25 hours estimated in the proposed rulemaking) for a large business the size of IT Corporation and to present the large, complex projects that the government requires . We also find the "Branch Office" reference point (i.e., the geographical office which represents the offerer) does not apply to a matrix-managed firm as IT Corporation. We find the proposed definition of Branch Office could require us to represent an office with no relevancy to the offered solicitation. With the proposed SF330, we also do not understand how to convey the relationship of a Branch Office to the other offices that may support the work.

For proposed SF330 Part II, we estimate it will take approximately 80 man-hours to complete the comprehensive company information (not the estimated 4 hours). We understand this Part should be prepared for each Branch Office and for each project in that office. Furthermore, IT Corporation estimates that if we were to follow the instructions, we must send out more than 1000 Part II's to the appropriate Federal Agencies. We do not believe this effort would streamline the existing system.

Recd 12/18/01

608-50

We strongly urge the Government to revise the proposed SF330 Form and implementing instructions in light of large businesses. We believe the Proposed Rulemaking has been tailored to single office, small businesses submitting on small, simple projects. We believe the proposed rules have not considered the impact to the large, matrix-managed firms with offices in each State submitting qualifications on both small and large projects.

Should you have questions regarding this information, you may call me at (865) 690-3211 in Knoxville, Tennessee.

Sincerely,
IT CORPORATION

William A. Gauntt

William A. Gauntt
Vice President

Enclosure

608-50

IT Corporation Comments on Proposed SF 330 as a Replacement for Existing SF 254/ SF 255

(Proposed Rule, FR Volume 66, No. 203, pg. 53314)

Proposed Rule: The Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils) are proposing to amend the Federal Acquisition Regulation (FAR) to replace SF 254, Architect-Engineer and Related Services Questionnaire, and SF 255, Architect-Engineer and Related Services Questionnaire for Specific Projects, with SF 330, Architect-Engineer Qualifications. SF 330 reflects current architect-engineer practices in a streamlined and updated form, organized in data blocks that readily support automation.

IT Corporation's (IT) Approach to Comments: These comments are presented as a section-by-section comparison of the SF 330 and its counterpart section from the SF 254/ SF 255.

Introductory Section –
In the section on public reporting burden, the estimate for the preparation of a Part I is listed as 25 hours. This estimate is very low. A more accurate estimate is an average of 40-80 hours, depending upon the complexity of the scope of services.

The estimate of 4 hours for Part II is also extremely low. A more accurate estimate is an average of more than 80 hours for a firm as large as IT, especially Part II elements 9 and 10 for the companywide submittal. Additionally, in accordance with the "branch office" definition given, a Part II would have to be completed for each IT location—about 80 at the present time. This could take another 80 hours at the minimum for the submittal.

As a general comment, the layout of the Part II form is extremely restrictive and cumbersome to complete. There is not enough room to conveniently enter the information requested (unless this will be performed electronically with automatic scrolling). Perhaps the form would print much better if was in landscape rather than portrait.

SF 330, Part I – Contract-Specific Qualifications: The contents of Part I is the equivalent of the SF 255. It allows the contractor to present its specific qualifications for the contract specified.

- **General** - Throughout the instructions there is a constant reference to "Branch Office" and a requirement that information be provided specific to this entity. This is not relevant to IT as a matrix organization in which office locations do not represent specific business entities. This document does not include a section for the labor category and number of employees available for the contract as Block 4 of the SF 255 does.

- **Part I, Section A. Contract Information (Former SF 255 Blocks 1-2b)**
There is no place for the client's name in this section. It should be added.

- **Part I, Section B. Architect- Engineer Point of Contact (Former SF 255 Block 3)**
The instructions do not indicate if there is a requirement that the "Point of Contact" must possess any specific position in the company (i.e., Officer of the Company).

- **Part I, Section C. Proposed Team (Former SF 255 Blocks 5 & 6)**
The requirement for branch offices involved in the performance of the contract suggests separate business entities exist within the firm. IT is a matrix organization and our office locations do not represent separate branch offices, but merely locations at which resources reside within the Company.

2000-608 30

- **Part I, Section D. Organization Chart of Firms and Key Personnel (No SF 255 equivalent)**
  No comments.

- **Part I, Section E. Resumes of Key Personnel Proposed for this Contract (Former SF 255 Block 7)**
  The new format for resumes includes additions that will result in improved representation of the qualifications and relevance of the key personnel for their role on the contract. However, the highly prescribed structure does not provide for a narrative overview of the key personnel experience. It is too restrictive and does not allow for the offeror to present their complete story.

- **Part I, Section F. Example Projects which Best Illustrate Proposed Team's Qualifications for this Contract (Former SF 255 Block 8)**
  The new format allows for expansion of relevant project information and allows for a direct link to be provided between the Section E Key personnel and the Projects. This increases the importance of having previous working experience with team members. However, the highly prescribed structure restricts the amount of narrative text that can be provided on a one-page project description. The "branch office" issue is raised again here.

- **Part I, Section G. Key Personnel Participation in Example Projects (New Section)**
  This is a very effective way of forcing the connection between the example projects and the key personnel. This is something that most A-E contractors currently try to do in Block 7 or 8 of the SF 255.

- **Part I, Section H. Additional Information (Former SF 255 Blocks 9 & 10)**
  No change from SF 255.

- **Part I, Section I. Authorized Representative (Former SF 255, Block 10 Signature Block)**
  No comments.

SF 330, Part II – General Qualifications: Part II of the SF 330 is the equivalent of the SF 254. It is the document that allows the contractor to present the general qualifications of the firm or a specific branch office of the firm.

- **General** – It appears that we must prepare the SF 330, Part II document (s) and provide them to "appropriate central, regional and local offices of each Federal Agency". The General instruction also asks that a Part II be prepared for each "branch office". If IT were to prepare Part II documents for each IT office and provide them to the appropriate Federal Agency offices, we would be preparing more than 1000 Part II documents for distribution. The instruction further requires that a Part II must be prepared for each project that includes a branch office as part of a team.

  The instructions need revising. Understanding and complying with the instructions is critical in that the General Instruction states that essentially a short list of firms for selected procurements can be compiled by a agency without an announcement, by merely reviewing Part II's on file.

- **Part II, Element 1. Solicitation Number** – For large businesses, any part II submitted with a Part I for a specific project will be tailored.

- **Part II, Element 2a-f. Firm or Branch Office name and address** – The same issue raised in the Part I discussion applies here. This is not totally relevant to IT as a matrix organization in which office locations do not represent specific business entities.

2000-608-50

- **Part II, Element 3. Year Established** – A firm with the size and history of IT would be hard pressed to track all of the different office locations to their origins. If able to comply, the information would not have any relevance to the process. We recommend a time limit be applied if this section remains (i.e., going back three years).

- **Part II, Element 4. DUNS Number** – No comments.

- **Part II, Element 5. Ownership** – No comments.

- **Part II, Element 6a-d. Point of Contact** – IT would list just one POC for all Part II documents

- **Part II, Element 7. Name of Firm** – No comments.

- **Part II, Element 8a-c. Former Firm Names** - A firm with the size and history of IT would be hard pressed to track all of the different office locations to their former names. If able to comply, the information would not have any relevance to the process. We recommend a time limit be applied if this section remains (i.e., going back three years).

- **Part II, Element 9. Employees by Discipline** – This section will need to be prepared for about 80 offices if we go the route of preparing one for each "branch office". This is not relevant to the submittal in most cases.

- **Part II, Element 10. Profile of Firm's experience and Annual Average Revenue for the Last 5 Years** – Preparing this information for "branch offices" is not possible. We accumulate revenue on a business line basis, not geographic offices.

- **Part II, Element 11. Annual Average Professional Services Revenue for the Last 3 Years** – Same issues as element 10. This information is compiled firm wide, but is very difficult to arrive at by office location.

- **Part II, Element 12. Authorized Representative** – We would provide only one authorized representative for the firm.

Summary of Comments - We strongly urge the Government to revise the proposed SF330 Form and implementing instructions in light of large businesses. We believe the Proposed Rulemaking has been tailored to single office, small businesses submitting on small, simple projects. We believe the proposed rules have not considered the impact to the large, matrix-managed firms with offices in each State submitting qualifications on small or large projects.

URS

2000-608-51

17 December 2001

General Services Administration
FAR Specialist (MVP)
1800 F Street, NW, Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

Re: Standard Form 330 – Architect-Engineer Qualifications

Dear Ms. Duarte:

Thank you for giving us this opportunity to review and comment on the SF 330. We understand the need both to streamline the proposal process and develop a format that supports automation. We look forward to implementing the new procedures and would like to offer our assistance in developing them, as appropriate. Please contact Sonda LaHendro and/or Forrest Terrell at the addresses and telephone numbers below to discuss our questions and comments and/or enlist our assistance in developing the new proposal formats.

Sonda LaHendro
URS Group, Inc.
1 Penn Plaza, Suite 610
New York, NY 10119
Tel. 212.330.1983
Fax: 212.947.6975
Email: sonda_lahendro@urscorp.com

Forrest Terrell
URS Group, Inc.
10975 El Monte, Suite 100
Overland Park, KS 66211
Tel: 913.344.1000
Fax: 913.344.1011
Email: forrest_terrell@urscorp.com

Respectfully,

Sonda LaHendro

Sonda LaHendro
Federal Programs Marketing Manager

Enclosure

2000-608-31

URS is pleased to review the SF 330 and send our comments, questions, and suggestions. Overall, we have two primary areas of concern: (1) It appears that creativity is being removed from the proposal process, which is unfortunate as that makes proposals more reader friendly for the reviewer. (2) We are concerned that SF 330 format will not lend itself well to conveying the amount and type of information federal agencies will need to select the most qualified contractor – especially when bidding on large, nationwide procurements. Our specific questions, comments, and suggestions, which support these concerns, follow.

Overview. Annual Reporting Burden. The Public Reporting Burden is estimated to average a total of 29 hours per response (25 hours for Part 1 and 4 hours for Part 2) per response. These numbers are greatly underestimated for large businesses. In fact, these numbers could be doubled or tripled to provide a large business enough time to prepare these forms.

Part 36.603. The proposed text change for Part 36.603 includes "removing from paragraph (d) introductory text 'shall' and adding 'must' in its place". What is the significance of this change?

Comments and Questions on Part I – Contract Specific Qualifications

1. **Section B, 12-14.** The Contractor is requested to "indicate each individual branch office that will be part of the team". For ID/IQ types of contracts, we often do not know in advance which branch offices will be required to support the technical effort.
2. **Section D, Organizational Chart of Firms and Key Personnel.** Will proposing contractors be allowed to include accompanying text or explanations with the organization chart? If not, sufficient information may not be conveyed to the evaluator.
3. **Section D, Organizational Chart of Firms and Key Personnel.** Reference is made to an organizational flowchart. We suggest using the more common term of organizational chart.
4. **Section E, Resumes of Key Personnel Proposed for this Contract – Block 20.** The width of this block may not be wide enough for degrees with longer names or dual majors. We suggest combining categories of information. We also suggest having fewer "blocks" and "cells" to clean the page and make it more reader friendly.
5. **Section E, Resumes of Key Personnel Proposed for this Contract – Block 20.** What is the difference between Discipline and Specialization? The instructions say it is " the area of emphasis" but is Specialization really necessary? We suggest combining Discipline and Specialization into one category.
6. **Section E, Resumes of Key Personnel Proposed for this Contract – Block 23.** The "Specific Role" would most likely only be a few words (such as Peer Reviewer), but the Description would be many words. There is the potential for a substantial amount of wasted space in this format.
7. **Section E, Resumes of Key Personnel Proposed for this Contract – Block 23.** The Year Completed category has not been requested in the past. This may be an easy task for small firms, but will require more time and effort for larger firms to research.
8. **Section E, Resumes of Key Personnel Proposed for this Contract – Block 23.** What is the distinction between "title" and "specific role"?

9. **Section E, Resumes of Key Personnel Proposed for this Contract – Block 20.** In the past, URS has put two resumes on one page to keep the page count to a minimum. The one-resume per page format will greatly increase the amount of paper that must be produced and read. Exhibit A illustrates the format we've used for two-per-page resumes. It is easy to read (information is still entered into table cells, making it easy to enter and control information, but the lines have been removed for a cleaner look). We suggest that a simpler design be considered.

10. **Section F – Example Projects Which Best Illustrate Proposed Team's Qualifications for this Contract.** Sections 28, 32, and 33 seem particularly limited. Proposing contractors will not be able to convey appropriate project relevance in the space provided, especially for nationwide contracts, if we are required to submit one-page project descriptions. We suggest reducing the amount of space provided to Section 31, Firms from Section C Involved with This Project, and increase the amount of space in Sections 28, 32, and 33.

11. **Section G – Key Personnel Participation in Example Projects.** This matrix is less useful (tells the reader less) than a matrix tying people and projects to scope of work areas (which would show at a glance that we have people with experience in the specific areas requested in the CBD announcement). A proposed alternative is attached (Exhibit B).

12. **Section G – Key Personnel Participation in Example Projects.** The definition of "key personnel" does not seem to be consistent with the "Sample Entries for Section G (Matrix)", which lists a CADD Technician as "key personnel." Please clarify.

13. **Section H – Additional Information.** It is not clear if pictures and/or graphics will be allowed in this section as they are in other areas of the format (e.g., Sections E23 and F28). Please clarify.

Comments on Part II – General Qualifications

1. **General Question.** For a national contract, are two Part II forms required - one for the corporation and one for the lead branch office?

2. **Part II Section 2a. Firm or Branch Office Name.** Page 1 of the SF330 under General Instruction, #2 states "If a firm has branch offices, submit a separate Part II for each branch office that is part of team." This would be a monumental task for large firms. For example, URS has 200+ offices in the United States. We would be required prepare various iterations of Part II to include staff members from other URS offices who may work on a federal contract. A branch office is defined as a geographically distinct place of business or subsidiary office of a firm. Even a simpler, localized contract, could require multiple versions of Part II to be prepared and submitted to support an individual contract. This could generate large amounts of paperwork.

3. **Part II, Section 9.** There is a conflict between the requirement that "each person can be counted only once according to his/her primary function" and Code 47 – Project Manager on the List of Disciplines. All Project Managers fall into one of the other technical disciplines. On an ID/IQ contract, an individual may be a project manager on one task order and serve only a technical role on another task order. We recommend that either Code 47 be deleted or the requirement that each person can be counted only once be modified.

4. **Part II, Section 10.** We find this section to be problematic. Most of our projects are multi-disciplined and include several (if not tens) of the categories on the List of Experience Categories. Allocating revenue to the specific categories would be virtually impossible, given that our projects overlap so many different categories. Another problem is that the List of Experience Categories mixes types of projects (e.g., harbors) with types of technical support (e.g., cost engineering and analysis). What if we have a project involving cost engineering and analysis of a retrofit to a harbor? How is the revenue for that project reported without either double counting or providing incomplete information?

Conclusion

Thank you for giving us this opportunity to review and comment on the SF 330. We understand the need both to streamline the proposal process and develop a format that supports automation. We look forward to implementing the new procedures and would like to offer our assistance in developing them, as appropriate. Please contact Sonda LaHendro and/or Forrest Terrell at the addresses and telephone numbers below to discuss our questions and comments and/or enlist our assistance in developing the new proposal formats.

Sonda LaHendro
URS Corporation
1 Penn Plaza, Suite 610
New York, NY 10119
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Forrest Terrell
URS Corporation
10975 El Monte, Suite 100
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Tel: 913.344.1000
Fax: 913.344.1011
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Exhibit A – Sample URS Two-Per-Page Resume Format

a. **Name & Title:**

b. **Project Assignment:**

c. **Name of Firm with Which Associated:**

d. **Years of Experience:** With this Firm____ With Other Firms ___

e. **Education:** Degree(s)/Year/Specialization

f. **Active Registration:** Year First Registered/Discipline

g. **Other Experience and Qualifications Relevant to the Proposed Project:**

- x
- x
- x, etc.

a. **Name & Title:**

b. **Project Assignment:**

c. **Name of Firm with Which Associated:**

d. **Years of Experience:** With this Firm____ With Other Firms ___

e. **Education:** Degree(s)/Year/Specialization

f. **Active Registration:** Year First Registered/Discipline

h. **Other Experience and Qualifications Relevant to the Proposed Project:**

- x
- x
- x, etc.

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Exhibit B
Block 7 – Engineering and Constructions Services Matrix
(place checkmark per person showing experience in scope of work areas)

					Engineering Services											Construction Support Services					Other Services			
Location	Staff Name	Registrations	Planning & design of military facilities	Planning & design of civil works projects	Plans	CADD drawings w/Microstation * AUTOCADD	Specifications	Use of SPECSINTACT Software	Design/Build RFPs	Construction cost estimates	Use of M-CACES Gold	Studies	Permit Applications	Use of Metric scale for new construction	GIS files for input to ESRI (Arcview/Arcinfo)	Shop drawing reviews	Field consultation	Design modifications	O*M Manuals	As-built drawings	GIS/Database	Force Protection	Security	Fire Protection
Corporate Sponsor																								
QA/QC Officer																								
Program Manager																								
Project Managers																								
Architects																								

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Location	Staff Name	Registrations	Planning & design of military facilities	Planning & design of civil works projects	Engineering Services											Construction Support Services					Other Services			
					Plans	CADD drawings w/Microstation * AUTOCADD	Specifications	Use of SPECSINTACT Software	Design/Build RFPs	Construction cost estimates	Use of M-CACES Gold	Studies	Permit Applications	Use of Metric scale for new construction	GIS files for input to ESRI (Arcview/Arcinfo)	Shop drawing reviews	Field consultation	Design modifications	O*M Manuals	As-built drawings	GIS/Database	Force Protection	Security	Fire Protection
Specification Preparation																								
Planning																								
Electrical Engineer																								
Mechanical Engineer																								
Civil Engineer																								
Structural Engineer																								

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					Engineering Services											Construction Support Services					Other Services			
Location	Staff Name	Registrations	Planning & design of military facilities	Planning & design of civil works projects	Plans	CADD drawings w/Microstation * AUTOCADD	Specifications	Use of SPECSINTACT Software	Design/Build RFPs	Construction cost estimates	Use of M-CACES Gold	Studies	Permit Applications	Use of Metric scale for new construction	GIS files for input to ESRI (Arcview/Arcinfo)	Shop drawing reviews	Field consultation	Design modifications	O*M Manuals	As-built drawings	GIS/Database	Force Protection	Security	Fire Protection
Geotechnical Engineer																								
Value Engineer																								
Fire Protection																								
Life Safety																								
Environmental Support																								
Force Protection																								
Security																								

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					Engineering Services											Construction Support Services					Other Services			
Location	Staff Name	Registrations	Planning & design of military facilities	Planning & design of civil works projects	Plans	CADD drawings w/Microstation * AUTOCADD	Specifications	Use of SPECSINTACT Software	Design/Build RFPs	Construction cost estimates	Use of M-CACES Gold	Studies	Permit Applications	Use of Metric scale for new construction	GIS files for input to ESRI (Arcview/Arcinfo)	Shop drawing reviews	Field consultation	Design modifications	O*M Manuals	As-built drawings	GIS/Database	Force Protection	Security	Fire Protection
GIS/Database																								
Cost Estimator																								
Surveyor																								
Subcontractors																								

Atkins
Benham

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2000-608-52

December 16, 2001

FAR Desk Officer
OMB
Room 10102, NEOB
Washington, DC 20503
and
General Services Administration
FAR Secretariat (MVP)
1800 F Street, N.W., Room 4035
Washington, DC 20405

Reference: Comments Regarding
FAR New Consolidated Form for Selection of
Architect-Engineer Contractors; Proposed Rule
Form SF330

Gentlemen:

This letter is written in response to your written request in the Proposed Rules in Federal Register / Vol. 66, No. 203 dated Friday, October 19, 2001.

Atkins Benham, formerly The Benham Group, has been providing architectural and engineering services to the federal government since 1909, and as a result has completed literally hundreds of Standard Form 254 and Standard Form 255 documents in response to Federal solicitation notices for A/E services. Members of our professional and marketing staff have dedicated themselves over the past two months to reviewing the proposed SF330 Form (replacement to the SF254 and SF255 forms) and prepared the following comments as to its potential use in future proposal responses.

Overall, the SF330 Form requires the same basic information collected for both the prime and potential consultants as was required with the SF254 and SF255 forms with a few exceptions. The new format has been changed to a "portrait-style" layout as opposed to the existing "landscape-style" format. The new format has more specific section layouts (i.e. more boxes) requiring information to be inserted where identified, leaving little space for flexibility. Additionally, many A/E firms that are fully automated in the preparation of this response will have difficulty adjusting to the new form with their existing software packages. This also applies to the creation of a whole new set of Experience Profile Codes.

12/18/01

Atkins

2000-608-52

During the course of our research and comparison studies, one question kept popping up regularly: Will this form be available electronically and also will it be expandable? There are a number of block sections that apply to our firm, in particular, but will require more space than what is shown on the example. On the other hand, there are some sections in the example that will not apply to our firm or joint venture and would need to be eliminated. Flexibility is an extremely important consideration in the layout of the form.

With regard to font size, for most federal agencies there has been the requirement by selection committees for the A/E to comply with a minimum font size in all solicitation responses. Most agencies are requesting responses be in a font size no less than 12 pt. The proposed SF330, in its current state, is approximately an 8 pt. document and allows responses in those sections to be about the same size or smaller. Even if the form is truly expandable, by increasing the font size of the responses to a 12 pt., the page count will increase dramatically from what the government anticipates by the current example form.

The proposed rules mention that less time will be necessary to prepare the new form as compared with the older format. We do not agree with this assessment. Two new sections (i.e., Section D – Team Organizational Chart and Section G – Key Personnel Participation Matrix) were typically included, if requested, in the Block 10 narrative section of the SF255. The creation of these two elements as separate sections along with the new page format and brand new Profile Code system, will **most definitely require more time to complete the form than the existing SF254 and SF255.**

The proposed rules also mention the desire of the federal government to apply the rules and implement the Paperwork Reduction Act as a part of this process. In researching the proposed SF330 form and comparing it to the existing SF254 and SF255 forms, it is apparent that this important element of the effort will not be met. Photos or renderings of past projects, typically included on the existing Block 8 of the SF255, are now being requested on a separate page, causing the Project Experience section to double in size. The Key Personnel Participation matrix and the Organizational Chart, typically included in the Block 10 Narrative of SF255, are being separated into their own sections. Again, this adds to the amount of pages required to complete the necessary form.

Specific questions or comments follow as they relate to each section:

Part I – Blocks 1 thru 11 – The proposed consolidated format doesn't include any spaces for ACASS numbers, CAGE codes, Federal I.D. Numbers or other required registrations for the Federal government that relate to past performance.

Is the Government eliminating these references from the required response?

Part 1 – The existing front page of the SF255 requests that all prime consultants identify how many professionals (by discipline) will be working on this particular project. It also includes space to identify numbers of personnel from any consultants assigned to the project, as well. The proposed new form has no such section. This form doesn't allow

2000-608-52

the A/E to identify the difference between the numbers of available staff at all offices and the numbers of professional staff who will work on this project specifically. If the section in Part II that refers to professional staff resources is the only section addressing this particular element of the response, the information received here could be very misleading.

Part I – Section D Organizational Chart – The proposed Rules refer to the identification of a firm name not individual or professional name. Projects are completed by people, not companies, and as a result of these instructions, it is difficult to understand how the Government wants the organizational chart to look.

Do you want individuals names in boxes with the designated firm name identified, as well? This is confusing. Also, this section is designated as a completely separate section on a separate page. This will create more time to develop and will definitely use more paper to produce.

Part I – Section E, Block 22 Other Professional Qualifications – Is this used to identify ALL states in which the professional is registered? Many professionals are registered in multiple states and some people are registered in multiple disciplines, especially in larger firms

Are we required to list EVERY state and EVERY registration in this Block? If so, can these blocks be expanded?

Part I – Section E, Block 23 Relevant Projects – This section seems unreasonably small space compared with the current format. Would seem difficult for selection boards to truly identify "best qualified" from small amount of information allowed in space provided. The proposed form layout is cumbersome and leaves less space to comment on relevance to a specific project. SF255 Block 7 format was one page but allowed more flexibility to create a logical methodology for including the individual on the design team.

Check if photos attached? Photos of what, the individual team members? This requires any photos to be placed on a separate sheet. What format, what size, how many per page and how do we identify which photo goes with which individual? Also, please see section addressing Paperwork Reduction Act.

Part 1 – Section F, Example Projects, Block 28 – Check if photo attached (could double page size to 20 pages for the section) as opposed to current 10 pages where photo is included on each project page.

Also, there are too many Block A thru I sections, not allowing enough room to expand Block 32 and 33. If the form is truly expandable here, will also make page count higher.

Part I – Section G, Key Personnel Participation Matrix – Yet another page added to the form.

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Small companies who have fewer employees doing the same work for every project will score higher here because of their lack of staff resources. This section might encourage the not-so-desired "bait and switch" behavior in A/E firms to score higher on this section. The A/E must show team members who have worked together before on past projects, regardless of whether these staff resources are actually available to be assigned to the project being advertised. We strongly encourage that the form be modified to stress the requirement that the **personnel identified in the submittal must be available for the project or this could be a cause for the government choosing NOT to enter into a contract with the selected firm.**

Part II – Section 10 – Profile of Firm's Experience and Annual Average Revenue for Last Five Years – Not nearly large enough for large firm typically involved in the design or construction of federal projects. Not enough room to fit project name, description and multiple profile codes on one line and include every project completed within the past three years. The way the form is created here, there is very little flexibility in this Block because of the adjacent Block 9. Also, if we input all required information as was common on SF254 for this part, we will go over one page for this Part.

We hope the above comments provide helpful feedback relative to the proposed SF330. If you have any questions or would like to discuss further any elements of this letter, I would be happy to make myself available to you at your convenience.

Sincerely yours,

ATKINS BENHAM, Inc.

Lance Benham, P.E.
Senior Vice President

LB:jls

2000-608-33

Allied Environmental Consultants, Inc.

December 17, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F. Street, NW, Room 4035
Washington, DC 20405

Attention: Ms. Laurie Duarte

Reference: FAR Case 2000-608
SF 330, Proposed Rule

Dear Ms. Duarte:

After careful review and consideration regarding the proposed changes in Federal Acquisition forms (referenced above), we have concluded that these changes are counterproductive and should be abandoned.

It is our understanding that the goal of the proposed rule was to make the process easier, more effective, resulting in better responses and more cost-effective selections. We believe that not one of these goals has been met.

The current system that has been in place for the past twenty-six years has worked relatively well and should not be considered for total replacement with a form that will cause excessive annual reporting burdens. According to the FCC Technical Report No. 130 on which the committee based the development of the proposed form, 90% of the government and 73% of the private sector are pleased with the current forms. Additionally, the survey further stated that the forms could be improved, but the report in no way suggests that the SF 254 and 255 forms should be replaced by a new form.

We have several concerns regarding the proposed SF 330. These are as follows:

Professional Service Fees

The collection of "fee" information or "professional services date of completion" information (*Federal Register Vol. 66, No. 203/Friday, October 19, 2001/Proposed Rules, Page 53317, Section F, No. 29 and Page 53325* **Section F, No. 29a. & b.)** is not necessary for proper performance of FAR functions, and has no practical utility. This data is not necessary nor is it legal. Collection of this information violates the *Brooks Architect-Engineer Act* procurement provisions for obtaining professional services.

12/18/01

The Anawalt House, 1109 N. Topeka ■ Wichita, KS 67214 ■ Mail: P.O. Box 234 ■ Wichita, KS 67201-0234
Phone: (316) 262-5698 ■ Fax: (316) 262-0736 ■ www.alliedenvironmental.com

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As the *Brooks Architect-Engineer Act* is written in Title 40, Subchapter VI, No. 542 Congressional declaration of policy:

> "The Congress hereby declares it to be the policy of the Federal Government...to negotiate contracts for architectural and engineering services on the basis of demonstrated competence and qualification for the type of services required..."

The *Brooks Architect-Engineering Act* does not say that it is the policy of the Federal Government to negotiate contracts for architectural and engineering services on the basis of fee performance. Asking for fees on professional services will have such an effect. We do not support fees included in federal procurement forms.

Time Needed to Complete Proposed Forms

The Committees estimates indicate that a 400% greater effort will be required between the current SF 254 form and the proposed Part II, SF 330 (1.0 hours versus 4.0 hours). Our practical experience shows that these numbers are grossly underestimated. Currently, it takes us approximately 40.0 hours to complete the SF 254 on an annual basis. If the committee's 400% increase estimate is accurate, it will take personnel in our firm approximately 160 hours just to complete Part II of the SF 330. This estimate does not take into account the number of extra hours for the learning curve, **nor does it account for the hours that it will take to perform the monumental task of recoding all of our databases to match the new proposed profile codes.**

It appears that there is no scientific or analytical basis for the numbers used by the committee for estimating hours needed for reporting. The proposed rule should be abandoned until scientifically based research on how the existing forms are performing and what, if any, modifications are needed.

Other Misconceptions

Contrary to what the Technical Report 130 stated, we do not tailor the SF 254 for a specific project announcement. It is our understanding that the SF 254 form is prepared on an annual basis and is used as a tool to help government firms evaluate qualified firms. We have never practiced tailoring our 254 to a specific project.

Quality and Clarity Concerns

Though we believe that the whole idea of the SF 330 should be abandoned until a more scientifically valid basis can be explained for its inception, we have decided to include specific issues that were glaringly misleading, confusing or needed to be addressed with the proposed SF 330 form.

- The form is inflexible and limits the firm from representing a true picture of its employees:

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  - There is not enough room for multiple education and/or multiple licenses entries
  - There is very little space for elaborating on specialized experience, type of clients served, and limits relevant projects to five.
- How will fees be defined?
- We understand that asking for e-mail and fax presents a more convenient way for Federal Agencies to contact professional references, however we believe that this is an invasion of the privacy of our clients who agreed to be our references. This invasion would require us to contact references and ask permission to use their email again adding to our burden of reporting. This should be stricken from the form.
- All of the projects that we maintain in our database for the past five years would be affected by the SF 330, in that all projects would have to be recoded to reflect the new coding system that is introduced with the SF 330 form. The costs associated with this task alone would be astronomical. Also, the profile codes are rigid and do not allow for additions to be made to further define or include specialized experience. As in the case of our firm, which is an environmental consulting firm, there is no way for us to describe our asbestos or lead-based paint experience, even though these are two of the most requested services by the Federal Government from environmental consulting firms.

If streamlining the SF 254 and 255 forms and reducing the public reporting burden are the goals of the committee, we would like to see this proposed rule abandoned. We would like to encourage you to seek valid, balanced data to gain input on changes that will accomplish your stated goals and win the support of all of the parties involved in the procurement process.

If you would like to speak to us further regarding this matter, please contact our office at your convenience.

Respectfully Submitted,

ALLIED ENVIRONMENTAL CONSULTANTS, INC.

William H. Keltner

William H. Keltner, P.E., L.S.
President

cc: Congressmen, Kansas (6)
Ad hoc Committee Members, SF 330
ACEC, Executive Director
Kansas Consulting Engineers, G. Barbee

2000-608-54

"Geary, Patricia"
<GEARYP@mail.rfweston.com>

12/19/2001 01:30 AM

To: '"farcase.2000-608@gsa.gov"' <farcase.2000-608@gsa.gov>
cc: "Geary, Patricia" <GEARYP@mail.rfweston.com>, "Irwin, Thomas J." <IRWINT@mail.rfweston.com>, "Leiter, Andy" <LEITERA@mail.rfweston.com>
Subject: FAR Case 2000-608 Comments on SF330

December 17, 2001

General Services Administration
FAR Secretariat (MVP)
Room 4035
1800 F Street, NW
Washington, DC 20405

ATTN: Laurie Duarte

RE: Proposed Standard Form 330
FAR Case 2000-608

Dear Ms. Duarte,

Roy F. Weston, Inc. (Weston) is pleased to submit the following comments regarding the replacement of the Standard Form (SF) 254 and SF 255 with SF 330. Weston provides over $120 million a year in services to federal government agencies including the Department of Defense, the General Services Administration and the National Aeronautics and Space Administration. Our contracts frequently result from the submittal of SF254 and SF 255 forms; based upon that experience we submit the following comments.

GENERAL COMMENTS

Weston has no problem with the SF254/255 as they are currently used. Our experience is that the time consumption in completing the forms is not related to the complexity of the forms, but rather to the complexity of the proposed opportunity. Change in format from SF254/255 may result in greater time and dollars spent in proposing. Also, the use of the singular SF330 form, rather than the two SF254/255 forms, may result in an SF330 format too simplified to provide adequate best value information to federal agencies.

SPECIFIC COMMENTS

The SF330 does not lend itself well to nationwide Indefinite Delivery/ Indefinite Quantity (ID/IQ) or broad scope of work contracts. Rather the form works well only for singular large projects at one location performed by one branch office. An example might be a potential contract for the US Army Corps of Engineers to provide Environmental Remediation Services for the North Atlantic Division, over a four-year period. The potentially hundreds of tasks could range from simple paper studies to site assessments to design to construction. The potential delivery order locations could be in any one of twelve states. The number of Weston personnel potentially performing on the contract could be over 1,000. The required correlation between personnel proposed, on undefined task orders, and project experience would require far more time consuming documentation in the SF 330 format than the current SF 254/255.

In Section E, the limitation to only five projects per resume is rather restrictive when trying to show experience relevant to large, broadly scoped contracts. Many environmental professionals are multi-disciplined which provides cost effective services to federal agencies. Can the proposing contractor lengthen the resume section to include more experience?

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In Section F, the space limitation for project descriptions is restrictive when trying to show experience relevant to large, broadly scoped contracts. A $50-million contract involving a hundred delivery orders at diverse locations across the United States with diverse scope of work for task orders requires much more space to explain. Can the proposing contractor lengthen the project experience section to include more experience?

In Part II, General Qualifications, Paragraph 9, the categorization of "project managers" as separate from other technical disciplines is not representative of multi-disciplinary personnel. Often an individual may perform "project management" on one task order and perform specific technical discipline duties on another. Can the list be structured to identify individuals who have more than one professional capability?

In the General Instructions, Part 2, Number 2, the requirement to include a separate Part II form for each branch office would require Weston to create and maintain Part II forms for approximately 50 offices. This requirement is time-consuming and expensive resulting in increased proposal costs.

Specific Instructions, Section D requires an organization chart for each branch office. On a nationwide/worldwide contract, Weston would have to provide over 50 organization charts. Could the requirement be amended to allow one organization chart appropriate to the program management of the contract?

CONCLUSION

In general, the SF330 does not lend itself well to nationwide Indefinite Delivery/ Indefinite Quantity (ID/IQ) or broad scope of work contracts. Weston has no problem with the SF254/255 as they are currently used. Our experience is that the time consumption in completing the forms is not related to the complexity of the forms, but rather to the complexity of the proposed opportunity. Change in format from SF254/255 may result in greater time and dollars spent in proposing. Also, the use of the singular SF330 form, rather than the two SF254/255 forms, may result in an SF330 format too simplified to provide adequate best value information to federal agencies.

Thank you for reviewing our comments. If you require any additional information, please contact me at 610-701-3123.

Very truly yours,

ROY F. WESTON, INC.

Patricia J. Geary
Federal Sales Director
gearyp@mail.rfweston.com
610-701-3123
610-701-3158 fax

2000-608-50

December 18, 2001

Laurie Duarte
General Services Administration,
FAR Secretariat (MVP)
1800 F Street, N.W., Room 4035
Washington, DC 20405

Farcase.2000-608@gsa.gov

RE: Standard Form 330

Dear Ms. Duarte:

Reid Middleton, Inc. has reviewed the proposed Standard Form 330 (SF 330) for Architect/Engineer Qualifications and would like to bring your attention to several issues to be taken into consideration.

Over 80% of our firm's work is for public agencies. In 2001, we have submitted over 500 qualifications packages. While only 8% of those were for federal agencies, we estimate that at least 30% required the Standard Forms 254 and/or 255 due to state, county and local agencies routinely requiring them. Thus, we have probably completed 150 forms this year alone. In addition, many of these submittals included multiple subconsultants. Based on this information, we believe that your estimates for annual reporting burdens are drastically lower than they should be.

Several individuals in our firm have reviewed the proposed SF 330 and have offered the following comments:

- It is unclear whether or not the form is expandable. Certain sections mention the option of attaching additional pages, but others do not. We feel that it is essential that the form be expandable in order to provide accurate information. For example, Sections E and F on Part II do not provide nearly enough space to include adequate descriptions.

- We have noticed that the Profile Codes are numbered differently on Part II for the proposed form than on the SF 254 and 255. This is a concern in regards to database maintenance and overall confusion. We are interested in learning the rationale for making this change.

- We feel that Part II - General Qualifications requests too much information on one page, and it is unclear as to whether or not this form is expandable.

Reid Middleton, Inc. is a 125-person civil and structural engineering, planning, and surveying firm with annual revenues of approximately $15 million. We have been providing exceptional service to public and private sector clients in the Pacific Northwest and Alaska for more than four decades. We offer technical expertise and a full complement of services to clients with projects in the following fields: airports, waterfront, site development, buildings, utilities, streets and highways, and surveying and mapping.

We appreciate the opportunity to provide feedback on the proposed Standard Form 330, and hope you will take these issues into consideration.

Thank you!

Reid Middleton, Inc.
728 134th St. SW, Suite 200
Everett, WA 98204
425-741-3800
425-741-3900 fax

12/18/01

2000-608-36

CH2M HILL
1250 H Street NW
Suite 575
Washington, DC
20005-3952
Tel 202.393.2426
Fax 202.783.8410

CH2MHILL

December 18, 2001

Proud Sponsor of
National Engineers Week 2000

Administrator FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
Washington, DC 20405

Dear Sirs:

Reference FAR Case 2000-608, New Consolidated Form for Selection of Architect-Engineering Contractors on behalf of CH2M HILL.

Employee-owned CH2M HILL, now more than 13,000 strong, operating out of 140 offices nation-wide, has served clients on six continents for 55 years with engineering, construction, operations and major project management services for water, wastewater, environmental, energy, nuclear, telecommunications, transportation, and high technology industrial infrastructure for both the public and the private sectors.

We have reviewed the subject regulation and prepared a proposal in the new format to determine the impacts on the time and cost of preparation. We have concluded that the new SF330 will significantly increase the cost to the architect-engineer industry of submitting proposals. Much of the cost will be incurred by the emphasis on "branch offices," which is not found in the SF254/SF255. This concept, as used in the SF330, does not reflect the way the architect-engineer industry does business and will impose unnecessary burdens on the industry with little benefit to the government. We strongly recommend against many of the requirements on listing branch offices in the new form. CH2M HILL offers the following comments for your consideration:

1. **General**. We recommend that the effective date for use of SF 330, if adopted, be no earlier than January 1, 2003, or six months following the approval of the amendment to the FAR to replace the SF254 and SF255, whichever is later.

2. **Part II-General Qualifications.**
   a. We commend the government for eliminating the old Section 11 of the SF254, the listing of projects in the last 5 years, since these data were not entered into the electronic database and apparently not used by the government.

   b. The requirement for submitting a Part II for each branch office will greatly increase the cost of preparing the Part II and we question the value of this information to the government. Our company has 140 branch offices. These offices are not profit centers, and therefore completing the form with historical revenues for each branch office will require our company to make major changes to our financial systems to collect these data. Currently, CH2M HILL submits four SF254s to the Corps of Engineers, one for each of the major business activities that do work for the Federal

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government (Transportation, Water and Energy/Environment) and a SF254 for the entire company. Each SF254 uses the personnel data for the entire firm, but the revenue varies based on the business unit. When we submit a proposal, we use one of these four SF254s based on the type of work. Therefore, we recommend a change in the regulation to allow companies to prepare the Part II either for the entire company only, or by "major business unit" rather than by branch office.

c. In Section 9, there is a requirement for both the numbers of personnel by firm and branch office. If the requirement for submitting a Part II for each branch office is eliminated, recommend that the only data needed for Part II is the firm-wide data.

d. In Section 10, there is no limit to the number of experience codes to be used for each Part II submittal. We recommend the instructions limit firms to use a maximum of 20 experience codes that best describe the firm's business.

e. The regulation is unclear as to the meaning of the term "revenue." Currently, the SF254 requires "fees" rather than revenues, which are viewed as the funds committed by the Federal government when awarding a contract. We recommend that the Part II continue with the use of fees, not revenues.

f. The regulation does not indicate the frequency of updating Part II. Contractors currently update the SF254 annually, and therefore we assume this will not change with the Part II. If this is not the intent, more frequent updates will put a greater burden on contractors.

g. We are unclear as to how Part II will be linked to the firm's ACASS number. This needs to be clarified.

h. Currently, the Corps of Engineers requires firms to update the SF254 that is linked to a contract awarded based on a SF255 submittal, for six years after award. This is a burden on firms and it appears the government does not use these updates for any purpose. We recommend that this requirement be eliminated with the issuance of the SF330.

3. **Part I, Contract Specific Qualifications.**

   a. **Section C, Proposed Team.** This section requires the listing of each branch office as if it is equivalent to a subcontractor. In the case of a subcontractor, there is a separate entity (corporate, partnership, or single proprietorship) and an associated level of responsibility that is important to recognize. In the case of branch offices, at least in CH2M HILL and many other large firms, a branch office is a place where people work but the accountability for their work rests with a business entity that may or may not be located at that office. Therefore, we do not believe the listing of branch offices in Section C as "Team Members" makes much sense. Additionally, it appears that Section C requires the listing of every branch office for which resumes are provided in Section E. In many cases, we will draw on numerous branch offices to get the appropriate technical resources for the scope of the contract, and in some cases we may have only one or two people from some branch offices on the team. If

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a listing of branch offices is required, then we recommend that the requirement to list branch offices in Section C be limited by "branch offices with significant roles on the team." We see no advantage to the government to have a listing of numerous branch offices that have limited involvement in the project. Our preference is to eliminate the branch office requirement in Section C entirely.

b. **Section D, Organization Chart of Firms and Key Personnel.** We do not understand the requirement for an "Organizational Flowchart" showing each firm (and each branch office) listed in Section C. Normally, a flowchart shows how work will be managed, but this does not appear to be what is intended by the requirement. To list all of the branch offices on a chart gets unwieldy, and we do not understand its value to the government. We also can show each firm, but since they are listed in Section C we do not see the need to list them on a chart. Normally, we show the key people from the subcontractors in a way that best represents their role on the project. We recommend that the government continue to simply require an organizational chart, which can be prepared by the firm commensurate with the scope of work and requirements of the government in the announcement, and if required by the contracting agency, that the firm affiliation and office location for each person be identified on the chart.

c. **Section E, Resumes of Key Personnel Proposed for this Contract**. In the past, we most often limited our resumes to one page, and in some cases have used one-half page for our technical resources, particularly for IDIQ contracts requiring a broad range of disciplines and geographic locations. By the design of the Section E form, we will have a minimum of a 2-page resume for each person. The government might consider whether it wants a rigid format or simply to define the information needed in the resume.

(1) Section E-22, Other Professional Qualifications. The items that can be included in this section are extensive. We recommend the instructions indicate that the contracting agency specify what it wants in this section, since we question that all contracting agencies want all the information listed in the instructions. It will be expensive for firms to include this much information in all resumes.

(2) Section E-23, Relevant Projects. We applaud the limitation of 5 projects per resume. We request a clarification whether those projects can be ones in which the person was involved when with another company, or only those projects of the firm in which the person is currently employed. We recommend that it be the former on the resume, since the government is attempting to get information on the person's experience, not the company's experience in this section of the SF330.

(3) In Section E-23(3), Year Completed. We applaud the ability to list projects not yet complete, since this may be some of the most current, relevant experience. However, we do not understand why the government would ask for separate dates for Professional Services and Construction when the SF330 is used only for Professional Services type contracts. If the government wants to get information

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on professional services provided during construction, we believe it will be adequately covered in the project descriptions and resumes if listed in the scope of work. Recommend Section E(3) be changed to simply require a date for Year Completed, or it may be more beneficial to the government to request "Years involved in the Project" for resumes to document the person's dates of involvement in the project.

(4) Section E-23(4) and (5). We strongly recommend a redesign so that Section 4, Description, and Section 5, Specific Roles, are arranged vertically (one over the other) rather than horizontally (next to each other) since we found in our pilot proposal that the project descriptions took up substantially more space than the specific roles of the individual, and therefore, much space was lost in the format.

d. **Section F, Example Project Which Best Illustrate Proposed Team Qualifications for this Contract.**

(1) Section F-29 and F-30. As with the format for resumes, we do not believe there is a need to have a block for year completed and cost of construction, since this information will not be relevant to professional services procured with the SF330. Recommend Sections 29 and 30 be consolidated to include the year the project, as defined in the description, was completed.

(2) Section F-31. We strongly recommend that the use of Section F-31 be limited to the listing of the team subcontractors, and not a listing of Branch Offices involved in the project. Section G provides the government with a matrix showing the relationship of the ten projects to the proposed Key Personnel, which provides the government with the most appropriate relationship between past experience and the proposed Team. CH2M HILL has not tracked branch office data and therefore, it would be costly to obtain it and document it on every completed project and task order. We think this would be the case with most larger A/E firms. In the case of an IDIQ contract with multiple task orders, different offices and subcontractors are often involved in the various task orders. The preparation of Section F-31 will be unmanageable in these instances.

CH2M HILL appreciates the opportunity to comment on the proposed SF330, and hopes the above comments will assist Federal agencies selecting A-E firms using qualification-based procedures. Care must be taken, however, so that unnecessary burdens and costs are not imposed on both Federal agencies and those who seek to provide services to the Federal Government.

Sincerely yours,

Richard L. Corrigan

Richard L. Corrigan
Senior Vice President
Governmental Affairs

2000-608-57

RECON

1927 Fifth Avenue, Suite 200
San Diego, CA 92101-2358

FAX TRANSMITTAL

TO:	General Services Administration	**DATE:**	12/18/2001
FAX NO.:	(202) 501-4067	**TIME:**	2:45 pm PST

FROM:	Sandra Fayette	**JOB NO.:**	0300
FAX NO.:	(619) 308-9334	**PHONE NO.:**	(619) 308-9333

NUMBER OF PAGES: 2 (including transmittal page)

DESCRIPTION OF MATERIALS BEING FAXED:

Comments on FAR case 2000-608 pertaining to the draft SF330 form.

COMMENTS:

Thank you for the opportunity to submit our comments.

☐ Hard copy to follow	☐ For review and comment

608-57

Federal Acquisition Regulation
New Consolidated Form for
Selection of Architect-Engineer Contractors
FAR Case 2000-608

Part I Contract Specific Qualifications

1. It doesn't appear to be necessary to number the blocks for Page Number (Block 1) and Total Pages (Block 2). They are not numbered on subsequent pages. It is recommended that the first block to be numbered be Title.

2. Section B – Architect-Engineer Point of Contact, Blocks 7-11. There is not a block for the contact person's firm name. It is recommended that this be added to the form.

3. Section D – Organization Chart. In the instructions, it is recommended to require that the organization chart contain blocks for Page Number and Total Pages.

4. Section E – Resumes. There is not a block to insert the key person's title at their firm. It is recommended that this be added to the form.

5. Section F – Example Projects. It is recommended to add a block for the project number for cross-reference with the matrix in Section G, Blocks 36 and 37.

6. Section F – Example Projects. It is duplicative to request the project cost in Block 28 (as stated in the instructions) and Blocks 29b/30b. It is recommended to delete the requirement for cost information in the instructions for Block 28.

Part II – General Qualifications

7. There are not blocks to provide firm's TIN, ACASS, or CAGE CODE. It is recommended that blocks for this information be added to the form.

2000-608-60

DEPARTMENT OF THE NAVY

NAVAL FACILITIES ENGINEERING COMMAND
1322 PATTERSON AVENUE, SE SUITE 1000
WASHINGTON NAVY YARD DC 20374-5065

IN REPLY REFER TO

18 Dec 01

From: Commander, Naval Facilities Engineering Command
To: General Services Administration, FAR Secretariat

Subj: PROPOSAL TO AMEND FAR TO REPLACE SF 254, ARCHITECT-ENGINEER AND RELATED SERVICES QUESTIONNAIRE FOR SPECIFIC PROJECTS WITH SF 330, ARCHITECT-ENGINEER QUALIFICATIONS

Ref: (a) FAR Case 2000-608

1. We have reviewed the subject proposed rule and believe consolidating the SF 254/255 into a SF 330 is an efficient and practical way to evaluate architect-engineering qualifications. The following minor comments and suggestions are provided:

(a) Instructions - Section E, Block 23 - add language to explicitly allow projects performed from other employers.

(b) Instructions - Section F, paragraph (1) - add "no more than" ten projects....

(c) Instructions - Section F, Block 28 - Consider noting a maximum number of photos that can be provided per project. A/Es tend to get carried away with this and send books of photos.

(d) Form - Section E, Block 22 - increases this block to accommodate more information. Most "key" personnel tend to come along with a substantial list of other professional qualifications.

(e) Form - Section E, Block 23 - change the title of the first block from "professional services" to "design services" or "design completion". Most A/Es are contracted to provide PCAS services as well and it may be confusing since they also provide professional services during construction.

008-30

(f) Form - Section F, Block 29 - also change from "professional services" to "design services" or "design completion".

(g) Under the list of disciplines (functional codes) - add a code for Anti-Terrorism Force Protection (ATFP).

(h) Under code D04 - "Design Build" - split it up by RFP preparation and design (for construction).

(i) Under code H01 - change to "waterfront facilities"; (piers, ships, etc.).

2. We support and agree that an electronic version of this form will improve the time constraints involved with preparing this required information.

3. The Point of contact is Frances Sullivan, who can be reached at (202) 685-9146, Sullivanfl@navfac.navy.mil.

Robert M. Griffin

ROBERT M. GRIFFIN
By direction

2000-608-59

"Ward, Ricky" <Ricky.Ward@kimley-horn.com>

12/18/2001 06:29 PM

To: farcase.2000-608@gsa.gov
cc: "Peed, Brooks" <Brooks.Peed@kimley-horn.com>, "Fischler, Angela" <Angela.Fischler@kimley-horn.com>, "Rankin, Tammy" <Tammy.Rankin@kimley-horn.com>, "Barrett, Laura" <Laura.Barrett@kimley-horn.com>, "Fares, George" <George.Fares@kimley-horn.com>, "Becker, Chad" <Chad.Becker@kimley-horn.com>, "Humbert, Amy" <Amy.Humbert@kimley-horn.com>, "Brittain, Melissa" <Melissa.Brittain@kimley-horn.com>, "Blaylock, Katie" <Katie.Blaylock@kimley-horn.com>, "Burchett, Fred" <Fred.Burchett@kimley-horn.com>
Subject: Comments on FAR case 2000-608 - New SF 330 form

On behalf of Kimley-Horn and Associates, we are submitting the following comments in regards to the new SF 330 form.

1. Whether this collection of information is necessary for the proper performance of functions of the FAR and will have practical utility.

* Not knowing the proper performance functions of the FAR it is difficult to comment on this aspect.
* At a glance it does appear that there is practical utility in using the new SF 330 form versus the SF 254 and SF 255 due to its more concise presentation of the information. If selections are made from this form, federal contract backlog is no longer a consideration as is currently reported in Item 9 of the SF 255 (we consider this a positive).
* There is no longer a requirement to list projects as part of Part II of the SF 330, which is currently required for the SF 254. While this reduces the effort to prepare this aspect of the new SF 330, it eliminates any qualitative judgements that can be made from a review of individual project descriptions and makes the review of Part II entirely quantitative based on the information listed in Items 10 & 11. This can potentially bias reviewers of the form against firms that report limited revenue (relative to the competition) in the relevant profile codes. Using this numerical reporting may not give an accurate perspective of a firm's capabilities nor of their potential performance for a particular project, even when combined with the project specific portion in PART I of the SF 330.
* Has any consideration been given as to how non-federal government entity will try to utilize this form, just as they now do with the SF 254/255? It would certainly be in the private sector's interest to maintain a level of consistency with these forms. If the point made in Bullet Point 3 above is a concern to a non-federal government entity, we presume that many will continue to utilize the current SF 254/255 forms.

2. Whether our estimate of the public burden of this collection of information is accurate, and based on valid assumptions and methodology.

* The 25-hour estimate for PART I may be understated. This will be especially true for projects involving large teams with lots of resumes. Some of the project data requested, such as Year Completed, will require research to obtain. Customizing this information to the relevancy of the contract will be even more critical as the overall amount of information is being limited (less projects on resumes and no projects in PART II). An extensive amount of time can also be put into the development and presentation of material to be included in Section H of PART I.
* Four hours for PART II may be reasonable IF the information for Items 10 & 11 is readily available. If this information has to be collected on a branch office basis, it could be very time consuming.
* Beyond the completion of this form, the data requirements will

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necessitate that firms spend more time, energy, resources and money to capture this information, thereby increasing overhead costs.

3. Ways to enhance the quality, utility, and clarity of the information to be collected.

PART I

* Can a third line be included for Item 20 to account for multiple advance degrees - BA, MS, PhD?
* Item 20 b & c - can you better define discipline versus specialization?
* Item 26 & 27 - clarify owner (of project) versus client (contractual relationship, i.e., as a subconsultant).
* Item 27 - owner point of contact versus point of contact for contractual relationship if a subconsultant?
* Section H - can graphics/photos be included? Is there a page limit?

PART II

* Is it necessary to report Item 10 and 11 information on a branch office basis? Our firm does not even capture nor report this information on anything other than a firm wide basis and would therefore be unable to provide this on a branch office basis.

General Comments

* Many of the individual blocks appear very limited in size or will require a small font to accommodate the size. Will respondents be able to manipulate the form to accommodate the information?
* Add Intelligent Transportation Systems to the List of Disciplines and List of Experience Categories

4. Ways in which we can minimize the burden of the collection of information on those who are to respond through the use of appropriate technological collection techniques or other forms of information technology.

* As previously mentioned, the burden will be on respondents to capture data that they have not historically captured, both for past projects and resumes as well as for the future.
* Can like information on PART's I and II be automated so that the data only has to be entered once?
* What electronic formats will be utilized, or will respondents be responsible for developing/purchasing electronic formats?

Ricky

Ricky Ward, PE
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P.O. Box 33068
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2000-608-60

"VOYCIK, John" <JVOYCIK@G-and-O.com>

12/18/2001 05:46 PM

To: ""farcase.2000-608@gsa.gov"" <farcase.2000-608@gsa.gov>
cc: FPT <FPT@G-and-O.com>
Subject: SF330 Comments

Greenhorne & O'Mara, Inc. of Greenbelt, Maryland respectively submits the following comments in regard to the creation of the new SF 330 which will replace the existing SF 254/255 for Architectural/Engineering and related services within the federal government under the purview of the Brooks A-E Act.

1. Overall, we think this is a good consolidation of the current SF 254/255 into one document, the SF 330. We believe it will facilitate the development of A/E qualifications in a more integrated and cost effective manner.

2. The new SF 330 seems to be developed with a "portrait" verses "landscape" page format. We would suggest the option or ability to also submit the SF 330 in a landscape format.

3. The discipline function codes should include such categories as computer software programmer, archaeology, photogrammetrist, hydraulic engineer, systems engineer, force protection specialist and military planner. We would recommend the elimination of the term draftsperson. The term CADD Technician covers this discipline function in today's business environment. Also, the word "geospacial" is mis-spelled. It should read "geospatial."

4. We recommend that the experience categories entitled force protection and biotechnology be added. We would also recommend that the terms for E01, Ecological & Archeological Investigations; and for F01, Fallout Shelters, Blast-Resistant Design be separated into four distinct experience categories. The experience category for S10 should be parsed into two distinct categories: Surveying, Platting and Mapping as one and Flood Plain Studies as the other.

Thank you for the opportunity to comment.

2000-608-61

"Lisa Jenkins"
<lisa@smps.org>

12/18/2001 05:03 PM

To: farcase.2000-608@gsa.gov
cc: "Ron Worth" <ron@smps.org>, "Jeannine Nelson" <jnelson@smps.org>
Subject: Far case 2000-608

Ms. Duarte:

The Society for Marketing Professional Services (SMPS) represents 5,200 marketers and business developers from architectural, engineering, and construction companies throughout the United States. As you can imagine, the release of the draft form of SF 330 has generated much interest among our members. Our members will work directly with the final form to submit their firms for consideration on projects, and they are very interested in its development. We have encouraged the members to submit feedback on the form directly to you, and I understand several have done so.

We will be placing a link to the Federal Register on our web site so our members can check in for announcements on SF 330's development. In keeping with our educational mission, we also are planning a session at our annual conference in July to introduce the form and educate members on the differences between SF 254/255 and SF 330.

As the form is finalized, if you should have an interest and need, SMPS would be happy to recommend members for a review panel on SF 330. Please feel free to contact me directly if we can be of assistance.

In addition, SMPS is happy to offer you or someone else in your department a free one-year membership in the Society. Because many of our members provide services to the government, you may find it useful to receive our publications and participate in events. Please let me know if you would like to take advantage of this opportunity, and I will make the necessary arrangements.

To learn more about SMPS, please visit our web site at www.smps.org.

Thanks very much for your time, and I look forward to hearing from you.

Best regards,

Lisa Jenkins

Lisa S. Jenkins
Director of Communications
Foundation Liaison
The Society for Marketing Professional Services
99 Canal Center Plaza, Suite 250
Alexandria, VA 22314
Phone: 703-549-6117 or 800-292-7677, ext. 230
Fax: 703-549-2498
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Web site: www.smps.org

Read a good business development book lately? Browse in the new SMPS Bookstore http://store.yahoo.com/marketing-resource-center/ from the comfort of your desk chair--and enjoy convenient online ordering.
Happy Holidays!

2000-608-62

"Patricia Caruso"
<caruso@tamsconsultants.com>

12/18/2001 04:44 PM

To: farcase.2000-608@gsa.gov
cc: "Albert DiBernardo" <DiBernardo@tamsconsultants.com>, "Kenneth Standig" <STANDIG@tamsconsultants.com>
Subject: FAR case 2000-608

Experience category D04 design build is not a type of project, but a "delivery system." Virtually any type of project (bridge, highway, courthouse, factory) can be procured thru the design-build process, but since, on section 10 of part II, you cannot double-count your projects, we would, for example, list an airport project being done under design-build, either as an airport terminal or as a design build project, but not both.

Since this approach does not accurately represent "the number of projects by type" that we are planning or designing or supervising, we suggest dropping this category. Alternatively, for clarity, we suggest a new column for "project delivery," such as design-bid-build, design-build, fast track, etc. That way, we could show experience, for example, for airports AND design build...

Thank you for the opportunity to comment. We look forward to the final output.
output.

Pat Caruso
Manager, Marketing Services
TAMS Consultants, Inc.
300 Broadacres Drive
Bloomfield, NJ 07003

2000-608-63

"Denny Marlin (E-mail)" <architects@gla1.com>

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR Case 2000-608, SF 330, proposed rule

12/18/2001 12:02 PM

December 18, 2001

General Services Administration
FAR Secretariat (MVP)
ATTN: Ms. Laurie Duarte
1800 F Street, NW, Room 4035
Washington, DC 20405

RE: FAR Case 2000-608
SF 330, proposed rule

Dear Ms. Duarte:

This letter is written in response to the proposed change in Federal Acquisition forms, as referenced above. It is our belief that the proposed SF 330, scheduled to replace the SF 255 and SF 254, is not an appropriate response to the need for updating the current forms and should be reevaluated.

Conversations with Ms. Cecelia Davis, procurement analyst for the effort to implement these changes, indicated that the goal of the proposed rule was to make the process easier, more effective, resulting in better responses and more cost effective selections. She encouraged us to comment as to whether or not this was being accomplished with the proposed rule. We do not believe that this will be accomplished with the proposed rule.

It seems particularly important to point out that it appears to us that the calculated time to complete the proposed SF 330 is severely underestimated. Initially, the time it will take to prepare this form will be substantially greater. Currently, we have several years' worth of past submittals that we use to speed the process of developing each submittal. We estimate that it will take a minimum of two years of submitting the proposed SF 330 to begin to rebuild this base. In addition, a great deal of time and resources will need to be allocated, simply to make the necessary changes to the profile codes in our company database. This will be further complicated by need to submit fees as opposed to construction costs on previous projects. We have no centralized database for recording fees, as we have had no need to have that information readily available. The gathering of fee information, by itself, could require as much as three hours per project. This could translate into as much as 30 hours per submittal until, at which time, this information could be updated. We estimate it could require as much as two years to update this fee information. In addition, there will be multiple reformatting issues, potential software upgrades, and information gathering that will substantially increase the amount of time and cost required to submit for a project utilizing the proposed SF 330. By our best estimates we expect that the amount of time that will be required to submit a proposed SF 330 will be two to three times greater than the amount of time it takes to submit the current SF 255.

This vast difference between what the committee has estimated it takes to complete forms and what it actually takes to prepare the forms, stems from the grossly underestimated figures that the committee began with and which they acknowledge were erroneous.

2000-608-63

"The current SF 254 approved information collection requirement states that it takes 1 hour to complete; and the current SF 255 approved information collection requirement states that it takes 1.2 hours to complete. Experience has shown that these hours are substantially underestimated." (Federal Register Vol. 66, No. 203/Friday, October 19, 2001/Proposed Rules, Page 53314, Section C.)

Not only were these numbers substantially underestimated, the committee continues to grossly underestimate the amount of burden required in its proposed Annual Reporting Burden estimates. The register does not indicate how the numbers were estimated and does not provide any evidence of substantiating efforts made to validate the estimates.

It would seem that a system, which has worked relatively well over the past twenty-six (26) years (1975 forward), should not be considered for total replacement with a form that will cause excessive annual reporting burdens. The SF 254 and 255 have resulted in numerous responses and quality projects. The proposed SF 330 form will result in this firm responding to fewer requests and providing less information of value.

In effect, the proposed SF 330 will achieve the opposite effect of selecting from the greatest pools of A-E talent. Instead the government will receive less-qualified contractor responses and fewer numbers of qualified A-E contractors. This appears to be the exact opposite of the committee's stated goals for implementation.

These arguments are further compounded by the FCC Technical Report No. 130 on which the committee based the development of the proposed form. In Part 3 of the report it states,
"90% of the government and 73% of the private sector are pleased with the current forms."
…"There was a very strong consensus among the respondents that the SF 255 is generally an effective format for presenting A-E qualifications for a specific project." (Federal Facilities Council Report Number 130, Page 13.)

According to the conclusions in the Federal Facilities Council Report Number 130 (Page 22) Survey on the Use of Standard Forms 254 and 255 for Architect-Engineer Qualifications, the SF 254 and 255 are effective.

"…This survey also shows that the SF 254 and 255 are effective formats for presenting A-E qualifications… All information on the forms is used by various (procurement) agencies and should be retained."

The survey further suggested that the forms could be improved to enhance their effectiveness, but the report in no way not suggested that the SF 254 and 255 forms should be abandoned and a new form take its place. We contend that the committee's goal of ease and effectiveness will not be realized with the proposed SF 330.

Further, we believe that this proposed regulation effort entraps industry A-E firms by asking for fees on previously completed projects, and therefore it provides a fee-based scorekeeping mechanism for Federal agencies to procure future contracts. We contend that these provisions, as set forth in the proposed SF 330, violate the Brooks Architect-Engineer Act.

The collection of "fee" information or "professional services date of completion" information (Federal Register Vol. 66, No. 203/Friday, October 19, 2001/Proposed Rules, Page 53317, Section F, No. 29 and Page 53325 Section F, No. 29a. & b.) is not necessary for proper performance of FAR functions, and has no practical utility. This data is not necessary nor is it legal. Collection of this information violates the Brooks Architect-Engineer Act procurement provisions for obtaining professional services.

2000-608-63

As the Brooks Architect-Engineer Act is written in Title 40, Subchapter VI, No. 542 Congressional declaration of policy,
"The Congress hereby declares it to be the policy of the Federal Government…to negotiate contracts for architectural and engineering services on the basis of demonstrated competence and qualification for the type of services required…"

The Brooks Architect-Engineer Act does not say that it is the policy of the Federal Government to negotiate contracts for architectural and engineering services on the basis of fee performance. Asking for fees on professional services will have such effect. We do not support fees included in federal procurement forms.

In the FCC Report No. 130, SF 255 Question 7, Page 17, this comment was made,
"Clarify whether the estimated cost is the A-E fee or the construction cost."

This comment is not asking for fees to be added to the form. This is asking for clarification. This clarification could be as simple as eliminating the column titled "Work for Which Firm Was/Is Responsible" (SF 255, Item 8, Part e). It should not include fees because that may lead to selection of firms based on fees rather than qualifications.

If streamlining the forms and reducing the public reporting burden are the goals of the committee, it is our desire to see this proposed rule abandoned. We strongly encourage and advise you to seek valid, balanced data thereby gaining input on changes that will accomplish your stated goals and win the support of all of the parties involved in the procurement process.

We invite you to contact our firm for input on real world manhours, costs and work efforts. Our firm encourages the committee to take steps to base their proposed regulations on scientifically obtained data.

Respectfully submitted,

Denny Marlin
Marketing Coordinator

Gossen Livingston Associates, Inc.
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phone (316) 265-9367 fax (316) 265-5646
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2000-608-64

"Pam Ekey"
<pekey@hornershifrin.com>

12/18/2001 12:54 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: FW: FAR case 2000-608 comments

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
Attn: Laurie Duarte
Washington DC 20405
December 18, 2001

Re: FAR case 2000-608

Horner & Shifrin, Inc. has reviewed the proposed Standard Form 330 and generally found it to be an improvement over the SF 254 and SF255. A few of the concerns noted include the following:

In the short term, the new SF330 will create more paperwork and more tracking for the engineering community until non-federal agencies that also use the SF 254 and SF 255 switch to the new reporting method. Until then, A/E firms will be required to maintain duplicate tracking systems to accurately report their experience to various agencies.

We also are concerned about the very small space available to describe project experience on Section E. Resumes of Key Personnel and Section F Example of Projects Which Best Illustrate Proposed Team's Qualifications. Neither section provides space to adequately describe relevant experience. Will federal agencies allow A/E firms to modify the form to allow additional space to describe their qualifications?

Is the intent of this form to eventually allow electronic submission? If so, will there be a limit on allowable file size? What specific software will be required to prepare and submit these forms electronically?

The list of Experience Categories (Profile Codes) seems to have been unnecessarily renumbered. No categories appear to have been added to or removed from the categories that appear on the SF 254 and 255. However, the renumbering of the categories will cause A/E firms to modify existing databases just to reflect the new numbering system.

We are in favor of adding the organization chart – it is something that we have been adding to SF255 submittals and find the chart to be a useful reference for our clients.

Pam Ekey, CPSM
Manager, Business Development

608-64

Horner & Shifrin, Inc.
5200 Oakland Avenue
St. Louis MO 63110
Phone: 314/531-4321
Fax: 314/531-4321
www.hornershifrin.com

2000-608-65

"Sandra Fayette" <sfayette@recon-us.com>

12/18/2001 05:25 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR case 2000-608@gsa.gov

Attached are our comments on FAR case 2000-608 pertaining to the draft SF330. Thank you for the opportunity to submit our comments.

Sandra Fayette
Business Development Coordinator
RECON Environmental, Inc.
1927 Fifth Avenue, Suite 200
San Diego, CA 92101
Tel (619) 308-9333
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sfayette@recon-us.com

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2000-608-65

Federal Acquisition Regulation
New Consolidated Form for
Selection of Architect-Engineer Contractors
FAR Case 2000-608

Part I Contract Specific Qualifications

1. It doesn't appear to be necessary to number the blocks for Page Number (Block 1) and Total Pages (Block 2). They are not numbered on subsequent pages. It is recommended that the first block to be numbered be Title.
2. Section B – Architect-Engineer Point of Contact, Blocks 7-11. There is not a block for the contact person's firm name. It is recommended that this be added to the form.
3. Section D – Organization Chart. In the instructions, it is recommended to require that the organization chart contain blocks for Page Number and Total Pages.
4. Section E – Resumes. There is not a block to insert the key person's title at their firm. It is recommended that this be added to the form.
5. Section F – Example Projects. It is recommended to add a block for the project number for cross-reference with the matrix in Section G, Blocks 36 and 37.
6. Section F – Example Projects. It is duplicative to request the project cost in Block 28 (as stated in the instructions) and Blocks 29b/30b. It is recommended to delete the requirement for cost information in the instructions for Block 28.

Part II – General Qualifications

7. There are not blocks to provide firm's TIN, ACASS, or CAGE CODE. It is recommended that blocks for this information be added to the form.

2000-608-66

"Lisa Jenkins"
<lisa@smps.org>

12/18/2001 05:03 PM

To: farcase.2000-608@gsa.gov
cc: "Ron Worth" <ron@smps.org>, "Jeannine Nelson" <jnelson@smps.org>
Subject: Far case 2000-608

Ms. Duarte:

The Society for Marketing Professional Services (SMPS) represents 5,200 marketers and business developers from architectural, engineering, and construction companies throughout the United States. As you can imagine, the release of the draft form of SF 330 has generated much interest among our members. Our members will work directly with the final form to submit their firms for consideration on projects, and they are very interested in its development. We have encouraged the members to submit feedback on the form directly to you, and I understand several have done so.

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As the form is finalized, if you should have an interest and need, SMPS would be happy to recommend members for a review panel on SF 330. Please feel free to contact me directly if we can be of assistance.

In addition, SMPS is happy to offer you or someone else in your department a free one-year membership in the Society. Because many of our members provide services to the government, you may find it useful to receive our publications and participate in events. Please let me know if you would like to take advantage of this opportunity, and I will make the necessary arrangements.

To learn more about SMPS, please visit our web site at www.smps.org.

Thanks very much for your time, and I look forward to hearing from you.

Best regards,

Lisa Jenkins

Lisa S. Jenkins
Director of Communications
Foundation Liaison
The Society for Marketing Professional Services
99 Canal Center Plaza, Suite 250
Alexandria, VA 22314
Phone: 703-549-6117 or 800-292-7677, ext. 230
Fax: 703-549-2498
E-mail: lisa@smps.org
Web site: www.smps.org

2000-608-67

"Laura Templeton"
<LLT@rettew.com>
12/18/2001 04:09 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: Comments on SF 330: FAR Case 2000-608

Attached are my comments. Thank you for the opportunity to provide feedback. If I can be of further assistance, please feel free to contact me via e-mail or at 717-394-3721, extension 3128.

Laura L. Templeton
Director of Client Services
RETTEW Associates, Inc.

- Publiccomments.doc

608-67

Ms. Laurie Duarte
General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW
Room 4035
Washington, D.C. 20405

RE: FAR Case 2000-608

Dear Ms. Duarte:

Below are my comments regarding the draft SF 330. To put these comments in some context, I am a marketing director for a 200-person multidisciplinary engineering firm that currently uses the SF 254 and SF 255 to respond to a wide variety of federal as well as state-level contracting opportunities.

General Comments

- **Time for Completion**: I believe that 29 hours is a fair estimate of completion time **after** companies get the mechanisms and procedures in place to collect the data and information in the format required. Until such time, I estimate it will take between 45 and 50 hours. Breaking down the revenue and other information by branch office will initially be quite time-consuming for companies who do not currently collect this information in this manner. For example, my company has six locations from which we can manage projects, but revenues are not currently broken out by office location because all billing is handled by our headquarters, and we currently track revenues by our company's service areas (land development, surveying, natural sciences, etc.), not by office location.

  Another effort that will initially be quite time-consuming and difficult is breaking down annual average revenue for the last five years according to the new list of profile codes. It will be no problem applying the new list of profile codes to any new work coming in. Where the problem lies is re-categorizing the past work. Many companies will want to do this because they will want to show past revenue (experience) in some of the new profile codes made available through the SF 330 such as "Design-Build," "Geographic Information System Development/Analysis," "Sustainable Design," and the various surveying categories (construction, hydrographic, and land boundary) that were formerly combined.

- **Paperwork Reduction:** I do not believe that the SF 330 will result in paperwork reduction until submission is electronic. In fact, I think that requiring consultants to place a separate SF 330, Part II, on file for each of its branch offices that might seek work with an agency will cause proliferation of paperwork that will be burdensome to the consultants and agencies alike.

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- **Grammatical issue:** "Which" is frequently used incorrectly throughout the form (e.g., "example projects which best illustrate proposed team's qualifications for this contract"). In most cases, the word should be "that."

Specific Comments

- **SF 330, Part I, Section C:** I think this section is confusing with regard to the use of branch offices. For example, let's say a consultant is proposing on a regional open-end contract that would potentially be staffed out of several offices. Does each branch office get listed in a separate box under Question 12, or is the firm's name listed once under Question 12, with all of the various addresses listed in the corresponding box under Question 13? And if each of the offices gets a separate box/listing under Question 12, are they all designated as "prime" or is just the headquarters office from where the work will be managed listed as "prime"?

- **SF 330, Part I, Question 23 (Resumes):** I believe that separating "description - box 4" from "specific role - box 5" will require significantly more time in form preparation for consultants because many have resume databases in which all of this information is combined into one paragraph or field. It is also unlikely that having these separate fields will appreciably assist the reviewers in assessing responsiveness. I would recommend combining these two into a field called "project description and specific role." This will also give consultants enough space to provide a meaningful response.

- SF 330, Part I, Questions 26 and 27 (Example Projects): The instructions for these questions need to be clarified. Question 26 says "project owner or user" while Question 27 wants a point of contact for the "project owner or the organization which contracted for the professional services." I think these instructions could result in a hodge-podge of information. For example, we often do work for architects (the organization that contracted for our professional services), but they are neither the owner nor user of the subject facility.

- **SF 330, Part I, Questions 29 and 30:** It would be much easier for consultants in terms of database management if we could put an **estimated** date of completion in boxes 29a and 30a rather than discussing the status in Question 28. I think it would be easier for evaluators of consultant qualifications to quickly identify project status as well.

- **SF 330, Part I, Question 38:** Is it permissible to include graphics and/or photographs in this section, even if not specifically requested? Will any page limit be set for federal submissions? Unless this is the case, I do not think the SF 330 will substantially reduce paperwork and/or time required for a submission, as compared to the current SF 254/255.

- **SF 330, Part II, Questions 6a-6d:** When completing Part II for a branch office, is it permissible that the contact listed be located in the headquarters office? In many cases, these are the personnel handling contractual and policy matters.

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- **SF 330, Part II, Question 7:** The parenthetical (if block 3a is a branch office) should be removed from the form or changed to read 2a. There is no longer a block 3a.

- **SF 330, Part II, Question 8a:** This question addresses former names, but wouldn't evaluators also need to know any other current names under which the firm (or branch) does business to review past performance on federal contracts? This is an issue because some firms have multiple subsidiaries or affiliates (sometimes at the same location), or they do business under different names in different regions or states.

- **SF 330, Part II, Question 9 (Employees by Discipline):** Up until this point in the instructions, it appears mandatory to list separately all branch offices performing work. The instructions here, however, lead you to believe that a company many submit as a firm and include all of its branch offices. Is this indeed an option? If it is, would the branches still need to be listed separately in Part I? Or are you only allowed to submit as a firm if you have a single location? Please clarify.

- **List of Disciplines:** Generally, I think this list is an improvement; however, I have one concern. Air/noise engineer has been removed. While noise engineers can now be placed under acoustical engineer, there no longer appears to be an appropriate category for air quality specialists. While I know that the form permits us to write in disciplines, I would recommend that an air quality category be established because 1) the demand for air quality services seems to be increasing, and 2) having a standard category for these staff would simplify matters for those assessing the responsiveness/qualifications of a consultant' s SF 330, Part II, Question 9.

- **SF 330, Part II, Question 10 (Annual Average Revenue for last 5 Years):** Again, the "branch office" concept creates confusion. Should the revenues reflect the work of the branch office only and not the entire firm? Should the profile codes selected be representative of the branch's work, not the firm's overall work?

- **SF 330, Part II, Question 12 (Authorized Representative):** May the signing authorized representative work in the headquarters office instead of the branch office for which this is being submitted? Again, most contractual and policy matters for our smallest branch offices are handled through our headquarters office. I do not believe this is uncommon among firms in our industry.

Thank you for providing an opportunity for feedback. If I can be of further assistance, please feel free to contact me via e-mail or at 717-394-3721, extension 3128.

Sincerely,
Laura L. Templeton
Director of Client Services
RETTEW Associates, Inc.

2000-608 68

"Pamela Jonas" <pjonas@kitchell.com>

12/18/2001 03:36 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR case 200-608 - Comments

Comment 1: I see no point in Changing from ACASS Profile Codes to SIC Codes. This would require complete database changes for most of the A/E firms currently using the ACASS Profile Codes. Especially those like my firm that uses Custom Designed Software packages. This would require completely re-thinking the entire project coding systems, upgrading software not only in our databases but in our minds as well. I've been using these codes for over 12 years and have most of them memorized. Many local agencies, such as State, City, County, and School Districts currently require the SF254 only for Vendor Application Databases...they too will have to change their use of profile codes for project experience.

Comment 2: Is the Part II - General Qualifcations A/E Qualification form in place of the SF254 and can this one page be used separately from the rest of the SF330 and it appears the formerly required 30 projects are no longer to be included on this particular form.

Comment 3: If this form is to be implemented, there is a concern that these same local agencies will continue to required the old forms. That will vastly impact the A/E/C firms if we have to maintain both SF330 and the form SF254/255 forms. Will there be a rule that ALL use of the former forms be banished?

Thank you for the opportunity to participate in this review process.

Pamela L. Jonas
Education Chair - Phoenix Chapter
Society for Marketing Professional Services
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(602) 212-3511
pjonas@kitchell.com

608-68

Federal Acquisition Regulation
New Consolidated Form for
Selection of Architect-Engineer Contractors
FAR Case 2000-608

Part I Contract Specific Qualifications

1. It doesn't appear to be necessary to number the blocks for Page Number (Block 1) and Total Pages (Block 2). They are not numbered on subsequent pages. It is recommended that the first block to be numbered be Title.
2. Section B – Architect-Engineer Point of Contact, Blocks 7-11. There is not a block for the contact person's firm name. It is recommended that this be added to the form.
3. Section D – Organization Chart. In the instructions, it is recommended to require that the organization chart contain blocks for Page Number and Total Pages.
4. Section E – Resumes. There is not a block to insert the key person's title at their firm. It is recommended that this be added to the form.
5. Section F – Example Projects. It is recommended to add a block for the project number for cross-reference with the matrix in Section G, Blocks 36 and 37.
6. Section F – Example Projects. It is duplicative to request the project cost in Block 28 (as stated in the instructions) and Blocks 29b/30b. It is recommended to delete the requirement for cost information in the instructions for Block 28.

Part II – General Qualifications

7. There are not blocks to provide firm's TIN, ACASS, or CAGE CODE. It is recommended that blocks for this information be added to the form.

Science Applications
International Corporation
An Employee-Owned Company

2000-608-69

Submitted Electronically: farcase.2000-608@gsa.gov

December 18, 2001

Ms. Laurie Duarte
FAR Secretariat (MVP)
General Services Administration
1800 F Street, NW, Room 4035
Washington, DC 20405

Reference: FAR Case 2000-608

Dear Ms. Duarte:

SAIC submits numerous qualification packages to the Federal Government under the FAR A-E procurement process; therefore, we appreciate the opportunity to provide comments to the Government on the proposed consolidated form. Attached please find comments related to the New Consolidated Form for Selection of Architect-Engineer Contractors (SF330), announced in the Federal Register of October 19, 2001 (Vol. 66, No. 203). We have provided the reference to the section of the announcement and the proposed form for ease of review.

Should you have any questions regarding our comments, please feel free to contact the undersigned at (703) 318-4731.

Sincerely,

SCIENCE APPLICATIONS INTERNATIONAL
CORPORATION

Betty M. Bidwell
Group Contract Manager
Vice President for Administration

cc: E. Morris, S. Ayers, S. Carder

12/18/01

608-69

Comments to Federal Register Announcement of Friday, October 19, 2001
48 CFR Parts 1, 36 and 53

FAR Case 2000-608 [RIN 9000-AJ15]

New Consolidated Form for Selection of Architect-Engineer Contractors

Part 53 – Forms
Proposed SF 330

1. The Background Section of the discussion for the proposed rule states that the proposed changes to SF 330 will eliminate "information of marginal value such as lists of all offices of a firm". For opportunities that are advertised for regional support or multi-site support, this list of additional office sites is of critical value. How does the new form propose to cover this frequent occurrence?
2. SF 330 General Instructions, Item 2: This item states that a separate Part II will be required for each team member and branch office. For complex projects (or multiple site projects) that may require a firm to use more than one office to support, this requirement would require extensive support and not appear to streamline the process. Please reconsider this instruction and allow for flexibility in preparation of this section and Part II.
3. Part I, Section E, Block 23, Relevant Projects: Will including up to 5 projects be an absolute requirement, or can an Agency in its specific announcement for an opportunity seek additional projects?
4. Part I, Section 3, Blocks 23 and 28: The use of strategic photographs historically has been a key factor in promoting and illustrating a firm's relevant experience. Is it the intent of the proposed rule to gradually eliminate the use of photographs? Will photographs only be allowed if specifically requested by an Agency? Also, the creative formatting, including the use of photographs, in completed SF255s is another illustration and measure of a firm's capability and responsiveness. Please comment on the formatting limitations that are contemplated by this proposed SF 330 process.
5. Part I, Block 37: Please clarify the purpose of listing the same projects in this Block as those required in Block 23.
6. Part II, Block 9: Please clarify the completion of this block, if a company contemplates the use of employees from more than one branch office. If, as required by the General Instructions, a separate Part II is required for each branch office, it will be difficult for the reviewing Agency to determine, for the specific project under consideration, the total staff available, qualified, etc.
7. Under the current procedures, it is suggested that a Company have on file a completed SF254 for use by Agencies in some limited source selections, with the requirement to update at least once a year and more frequently if significant changes occur. Will the new proposed rule include Phase II instructions for annual submittal for the record and Agency use? Will the Federal Government continue to maintain a database of this information?

608-69

8. As you know, the information from the SF254 is maintained by the USACE Portland District for the ACASS and CCASS systems. How will the proposed changes for the SF330 impact this data system and retrieval of information for past performance purposes?
9. Will the new rule allow for electronic submittal of the entire SF 330, Parts I and II (separately), photographs? If electronic submissions will be allowed, will offerors be required to submit both electronic and hard copies?
10. Please consider repositioning of the page number fields on the resulting form. The numbers as currently shown appear to be associated with particular sections and not to the overall document. When completing certain blocks of the forms, the page breaks will not be the same in actual submittals; therefore, the page number information will be misplaced creating confusion during review (especially if the form will be provided electronically).
11. In light of the proposed requirements for multiple Part II submissions for branch offices in response to an announcement, the estimated hours for completion of this form appears to be substantially understated. In addition, the requirement for specific links between sections will also require substantial time for completion of the form. In addition, we have found that awards under A-E procurements attract upwards of 50 responses and are very competitive requiring substantial efforts to refine each section to meet the Agency's specific needs and requirements. For the most part, this is not boiler-plate information.

CASNE ENGINEERING, INC.
Electrical and Technology Consultants

2000-608-70

December 18, 2001

General Services Administration
FAR Secretariat (MVP),
1800 F Street, NW. , Room 4035
Washington, DC 20405

Attention: **Laurie Duarte**

Subject: **FAR case 2000-608**

Dear Ms Duarte
I am writing to comment on the new form SF 330 Architect and Engineer Qualifications.

We are a small Electrical Engineering Firm and usually serve as a sub-consultant on projects. My concern is that the Form as presently drafted seems to favor the use of teams which have previously worked together and discourages the use of new sub-consultants.
Section C. requires the proposer to show sub-consultants for the project, however in Section F. where project examples are shown, section 31 asks for firms from section C that were involved with the project. If the firms had not previously worked together it is very unlikely that the prime proposer would use our firm for the sought after project. This truly encourages the same teams to work together over and over and may not get the best qualified firms together for the project. It truly places small specialty firms like us at a disadvantage.
I strongly encourage you to revise the form to allow the prime proposer the opportunity to explain why he has chosen a particular sub-consultant for this project and allow the sub-consultant an area to submit project examples to demonstrate capability.

Thank you for considering my comments,

Sincerely,

Casne Engineering, Inc.

Robert J .Casne, P. E.
President

12/24/01

355 - 118th Ave SE, Bellevue, WA 98005 • Ph: 425.454.3555
609 N. Argonne Rd., Suite B, Spokane, WA 99212 • Ph: 509.922.7897

2020-608-71

lan

Lockwood, Andrews & Newnam, Inc.

A SUBSIDIARY OF LEO A DALY

November 13, 2001

FAR Desk Officer
OMB, Room 10102
NEOB,
Washington, DC 20503

I offer the following comments to the Draft SF 330, Architect Engineer Qualifications.

1. The list of disciplines (Function Codes) fails to account for degreed personnel who is not yet licensed to practice that discipline. The previous form codes included "Intern Architects" or "EIT" (Engineer-in-Training) personnel. Laws in some states prohibit firms from referring to non-licensed personnel in their area (e.g., Architects), but listing a degreed but non-licensed engineer or architect as a CADD technician or draftsperson does not adequately reflect the capabilities of that individual.

2. Part E, Resumes of Key Personnel

a. Section 21., Current Professional Registration. This category asks for "year first registered", which is irrelevant in some instances. An engineer may have been first registered in state X in 1980, but exclusively practices in state Y, where the engineer became registered in 2000. If registration in state x is discontinued, this form does not allow for the initial registration to be listed; furthermore, the "year first registered" in state y suggests that the professional is less experienced than reality. If the intent is to demonstrate experience, I recommend the following change to the form.

-Change section 21 to read "Professional Registration History"

-Add a column for "Current"

This change enables the resume to describe where and when the professional was first licensed, and enables the form to display relevant current licenses.

b. Section 23., Relevant Projects. Space provided for Project Descriptions is too small for its required text.

Sincerely,

Mark Vincent

Mark Vincent, PE
Federal Programs Manager

cc:
GSA, FAR Secretariat (MVP)
1800 F. Street NW, Room 4035
Washington, DC 20405

12/26/01

2000-608-72

"Pam Cushman"
<pamc@tnh-inc.com>
12/24/2001 12:54 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: SF 330 Comments

Attached are my comments/questions on the new proposed SF 330.

Happy Holidays!

DRAFT SF330 Form
Comments and Questions from Alaska A&E Firm

Because of the extensive comments we have, we request that the Government solicit additional comments on a second draft BEFORE implementing these changes permanently.

GENERAL COMMENTS AND CONCERNS, AND QUESTIONS REGARDING INSTRUCTIONS:

- Is there an implementation date set (or being considered) for switching from SF254/255 to SF330? During implementation period, will there be some continued use of SF254 and SF255 allowed?
- Annual reporting burden seems to be GROSSLY underestimated. Even a small-sized consulting firm can easily respond to one request for qualifications a month. Multiply twelve responses a year times multiple submittals for each project (because of the new matrices, an engineering firm offering multiple disciplines will now have to submit unique responses for each combination of disciplines requested by the prime consultant).
- Suggest adding a space (perhaps on the first page of Part I) for A-E's web site. With the limited amount of space in these proposed Standard Forms, the selection committees may want to do their own research on the WWW.
- Which information will be provided and input into the ACASS system maintained by the Corps? If it is Part II, then the solicitation number should be removed, and this could be an annually updated form (attached to Part I if required by the contracting agency).
- Will this form be used for design/build work? If so, there will be an entirely separate set of questions generated by contractors seeking to use this proposed form.
- "Separate Part 2 for each firm and branch offices on the team": This could mean that we feasibly would need to turn in seven Part 2s if we had team members from each of our offices. This doesn't reduce paperwork.
- The FAR definition of "Firm" doesn't differentiate between headquarters and branch offices, but the form asks for it on Page 8.
- It states (on page 1 of Draft form) that Individual Agencies may supplement the requirements. Would this be with additional forms, questions, or simply limiting pages, etc?
- Page 1 states that a benefit of the form is to "Facilitate electronic usage by organizing the form in data blocks?" Does this mean that this form will be provided electronically? If so, what format will it be supplied in?
- What software will be used to "facilitate electronic usage"? A database is really required to organize this amount of data… on the firm and each employee of each office or branch. Any software that is NOT a database will not facilitate electronic usage.
- It is unclear when Part 1 will be required. Is it based on a dollar amount or is it subjective and up to the contracting officer. (See language on Page 2, under 36.603 (b))
- Will A/Es be able to submit the SF330 form(s) electronically?
- Has the Government created a "test" RFP response? If so, what database

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program did they use to develop it? Would the government be willing to provide the A/E community with a copy of this "dummy test response" so we know what your intentions are. If not, how do they "know" this form will work with database applications?

- The form does not appear to provide guidelines for font types and sizes and the rows are very small. Is it the Government's intention to allow the same type of redesign that have morphed the 255s or are these forms intended to be "locked." If locked, how are we to provide all of the information in the spaces provided? Teeny, tiny type? This will be very hard on your reviewers!
- The amount of text required on each page, and the number of matrices included, will not allow much "white space" to relieve the eyes of the reviewers. These small spaces will be very difficult to read when completed.
- Page 4 - Under Part II instructions, items 10 and 11: For firm's experience categories, FIVE years history is requested under item 10, yet annual average professional services revenues only requests the last three years. For consistency, the same number of years should suffice for both pieces of information. Suggest three years for both items 10 and 11.
- Page 5 - List of Disciplines (Function Codes): Although the rationalization for changing to SF 330 includes the hope that the new form "reflects the industry", the revisions proposed do not reflect the A/E industry. For example:
- Generally, a CADD Technician and a Drafter serve the same function. There are only a miniscule number of hand drafters left and most of those are also CADD Technicians.
- Communications Engineers in the industry are generally also electrical engineers.
- Electronics engineers in the A/E industry are generally not the same as an electrical engineer, and they are not interchangeable
- Specifications do not necessarily fall under Engineering. Many architectural firms have specifications specialists. Specifications are should be a stand-alone discipline.
- Information systems also should be removed from the Engineers category, and listed as a separate discipline.

COMMENTS ON PART 1 - CONTRACT-SPECIFIC QUALIFICATIONS:

- Page 8: What value is there to requiring that the actual and total number of pages be listed on each page? This would cause problems for the A/E when total page numbers are altered, in that each sheet will then need to be changed and/or reprinted.
- Page 8: Item 16 - Space provided will only allow a two or three word explanation of each person's role. For some specialty services, this might not be so easily self-explanatory.
- Page 8 - Part D of Part 1 - Organization Chart states "Organization chart of firms and key personnel." Taken literally, it appears the contracting officer will want a corporate organization chart for EACH firm, highlighting team personnel? (See page 4 and page 10). Would not a team chart be more useful?
- Will the organization chart need to be included in page numbering?
- Page 9, Item 23 - Space is provided to check if photos are attached. Will there be a requirement for some sort of standard title blocks to tie photos back to Page ?
- Pictures: This is a very touchy issue. The reason for the touchiness is that many firms have pictures made of their projects, but the pictures are copyright protected. If Joe was involved in a project with one firm but moved to another firm, he may not have the right to use that picture. You're leaving the government open to problems. It's better to just have project

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pictures for the firm.

· Section E asks for resumes to be grouped by firm with the prime first. This implies that the Part 1 is always a combined submission. (One Part 1 for the team, versus one Part 1 from each participating firm.). Is the Part 1 always going to be a "combined" document including all firms?

· If Section E is always a combined form for the entire team… will the matrices of experience by individuals on specific projects make it more likely for teams to submit sub-consultants that they have always worked with in the past… as opposed to the BEST sub-consultants for the upcoming project? Where is the incentive to bring new talents and experience to the selection of team members?

· Under the Resume section for "Relevant Projects" if the agency does ask for photos, will you be downgraded for not having them? Also by limiting the number of projects to five, you may be limiting those who can exhibit massive relevant project experience. A person with 20 relevant projects can' t demonstrate that they are more qualified than a person that shows his only 5 projects.

· What are you expecting as photo attachments? 8-1/2X11" slick glossy color
photos one high-quality paper stock? Will there need to be a page number on each photo… in which case they must be individually printed for EACH submission of a SF330, since page number will change with each submission. This could cause additional expense for the A/E firms.

· Should there be a standard "title block" tying each picture back to the Section F?

· Will photo pages be page-limited? (i.e., one photo per project, versus one
photo PAGE per project, versus no limits?)

· Page 10 - Section F has been changed to read "Present 10 projects." If you
do not have a full ten projects would this be an automatic disqualifier? The old 255 form read "Present up to 10 projects."

· Page 10 - Item 27 - Project Owner: This is a very interesting question and
I would think the GSA if any organization would be cognizant of the difference in owner vs. user etc. Sometimes, it is better to have the USER as a contact. Sometimes the owner is different from the entity responsible for the design and construction which in turn is different from the entity who will be maintaining and using it. There's no flexibility for additional contacts or for contacts from the various people. Would you rather have someone who, from the Contracting point of view was excellent but whose work fell apart a year after the warranty period expired?

· Requiring a fax number is additionally labor intensive. E-mail addresses (if available) and telephone should be adequate.

· Page 10 - Item 33 - Additional Project Information: What else could possibly be included that would fit in this small space???

· Page 11 - How detrimental is not having the proposed team members' work on
the firm projects listed? If this is a highly valued criterion, you may swing firms to only use principal or senior level staff. This practice could prove to be more costly for the government, was this anticipated? Most of the procurement announcements and regulations state that the Government encourages contracts with new businesses. It appears that the project lists in Section E (which require names of people who have been involved in specific projects) is discriminatory toward new businesses. Was it the intention of the Government to prevent new businesses from getting contracts with them? In other words, if you have a new business with very experienced professionals, who happen to have experience in a different city, or area and therefore have no experience with local subconsultants or prime consultants, how is the government going to handle this issue?

COMMENTS ON PART 2 - GENERAL QUALIFICATIONS:

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- Regarding the note at top of form… "(If a firm has branch offices, complete for each specific branch office seeking work.)" If the solicitation is for a term contract (IDC or ID/IQ type) contract on a statewide or regional basis… firms may have to attach multiple Part II responses for offices in other cities and/or states.
- Block 5.b: The NAICS codes do not refer to Small Business Status, they are
the replacement for SIC codes. If you want to know whether or not the business is Small, Small disadvantaged, Hub-Zone, etc., you should correct the General Instructions on Page 4.
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- Why are you asking for the DUNS number, instead of some other Government identifier? We are required to obtain ACASS, CAGE, CCR, TIN and NAICS codes from the Government… and the only one you ask for is a private industry identifier…

Pam Cushman
Marketing Coordinator
Tryck Nyman and Hayes
Phone: (907) 343-0248
Fax: (907) 276-7679

"Susan Stabler" <sstabler@ecihyer.com>

12/21/2001 07:28 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: SF 330 Comments

2000-608-13

GSA FAR Secretariat

I would like to submit the attached comments in reference to the new SF 330 Form.

Thank you for your consideration.

Susan Stabler
ECI/Hyer, Inc.
(907) 561-5543
(907) 562-3213 - Fax
sstabler@ecihyer.com
www.ecihyer.com

- SF 330 comments-Take 31_1.doc

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DRAFT SF330 Form
Comments and Questions from Alaska A&E Firms

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2000-608-14

"Carol Gibson"
<CGIBSON@mbakerc
orp.com>

12/26/2001 12:57 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: SF 330 Comments

GSA FAR Secretariat,
attached are my comments regarding the proposed SF 330.

Thank You,
Carol Gibson
Proposal Coordinator
Michael Baker, Jr. Inc.
Alaska Office
907-273-1628

- SF 330 comments-Take 31.doc
- Carol Gibson.vcf

608-74

DRAFT SF330 Form
Comments and Questions from Alaska A&E Firms

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608-74

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608-79

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2000-608-75

"Holly M Kelty"
<Holly@larsen-anc.com>

12/28/2001 12:24 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: SF300 Comments

GSA FAR Secretariat:

Attached is a compilation of comments from Alaska A/E firms regarding the SF300.

Holly Kelty

(907) 245-8866 (direct)
(907) 243-5629 (fax)

Larsen Consulting Group, Inc.
3710 Woodland Dr., Ste. 2100
Anchorage, AK 99517

<<SF 330 comments-Take 31.doc>>

- SF 330 comments-Take 31.doc

2000-608-75

DRAFT SF330 Form
Comments and Questions from Alaska A&E Firms

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2000-608-76

"Willy Van Hemert"
<wvanhemert@crweng.com>

12/26/2001 11:50 AM

To: farcase.2000-608@gsa.gov
cc:
Subject: SF 330

Attached please find my comments regarding the the new SF 330. Thank you.

Willy Van Hemert, PE
CRW Engineering Group
3900 Arctic Blvd., Suite 203
Anchorage, AK 99503
phone: (907) 562-3252
fax: (907) 561-2273
e-mail: wvanhemert@crweng.com
web: www.crweng.com

- Blank Bkgrd.gif
- SF 330 Comments-12-26-01.doc

608-76

DRAFT SF330 Form
Comments – CRW Engineering Group

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408-76

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2000-608-77

"Irwin, Thomas J." <IRWINT@mail.rfweston.com>

01/02/2002 11:42 AM

To: "Geary, Patricia" <GEARYP@mail.rfweston.com>, "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc: "Leiter, Andy" <LEITERA@mail.rfweston.com>
Subject: RE: FAR Case 2000-608 Comments on SF330

Just an FYI. While it's a mute point here, the response date has been extended to 8 January 2002. Normally this happens when there are a large number of responses and/or requests for extensions.
Tom

> -----Original Message-----
> From: Geary, Patricia
> Sent: Wednesday, December 19, 2001 1:31 AM
> To: 'farcase.2000-608@gsa.gov'
> Cc: Geary, Patricia; Irwin, Thomas J.; Leiter, Andy
> Subject: FAR Case 2000-608 Comments on SF330
>
> December 17, 2001
>
> General Services Administration
> FAR Secretariat (MVP)
> Room 4035
> 1800 F Street, NW
> Washington, DC 20405
>
> ATTN: Laurie Duarte
>
> RE: Proposed Standard Form 330
> FAR Case 2000-608
>
> Dear Ms. Duarte,
>
> Roy F. Weston, Inc. (Weston) is pleased to submit the following comments regarding the replacement of the Standard Form (SF) 254 and SF 255 with SF 330. Weston provides over $120 million a year in services to federal government agencies including the Department of Defense, the General Services Administration and the National Aeronautics and Space Administration. Our contracts frequently result from the submittal of SF254 and SF 255 forms; based upon that experience we submit the following comments.
>
> GENERAL COMMENTS
>
> Weston has no problem with the SF254/255 as they are currently used. Our experience is that the time consumption in completing the forms is not related to the complexity of the forms, but rather to the complexity of the proposed opportunity. Change in format from SF254/255 may result in greater time and dollars spent in proposing. Also, the use of the singular SF330 form, rather than the two SF254/255 forms, may result in an SF330 format too simplified to provide adequate best value information to federal agencies.
>
> SPECIFIC COMMENTS
>
> The SF330 does not lend itself well to nationwide Indefinite Delivery/ Indefinite Quantity (ID/IQ) or broad scope of work contracts. Rather the form works well only for singular large projects at one location performed by one branch office. An example might be a potential contract for the US Army Corps of Engineers to provide Environmental Remediation Services for

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> the North Atlantic Division, over a four-year period. The potentially
> hundreds of tasks could range from simple paper studies to site
> assessments to design to construction. The potential delivery order
> locations could be in any one of twelve states. The number of Weston
> personnel potentially performing on the contract could be over 1,000. The
> required correlation between personnel proposed, on undefined task orders,
> and project experience would require far more time consuming documentation
> in the SF 330 format than the current SF 254/255.
>
> In Section E, the limitation to only five projects per resume is rather
> restrictive when trying to show experience relevant to large, broadly
> scoped contracts. Many environmental professionals are multi-disciplined
> which provides cost effective services to federal agencies. Can the
> proposing contractor lengthen the resume section to include more
> experience?
>
> In Section F, the space limitation for project descriptions is restrictive
> when trying to show experience relevant to large, broadly scoped
> contracts. A $50-million contract involving a hundred delivery orders at
> diverse locations across the United States with diverse scope of work for
> task orders requires much more space to explain. Can the proposing
> contractor lengthen the project experience section to include more
> experience?
>
> In Part II, General Qualifications, Paragraph 9, the categorization of
> "project managers" as separate from other technical disciplines is not
> representative of multi-disciplinary personnel. Often an individual may
> perform "project management" on one task order and perform specific
> technical discipline duties on another. Can the list be structured to
> identify individuals who have more than one professional capability?
>
> In the General Instructions, Part 2, Number 2, the requirement to include
> a separate Part II form for each branch office would require Weston to
> create and maintain Part II forms for approximately 50 offices. This
> requirement is time-consuming and expensive resulting in increased
> proposal costs.
>
> Specific Instructions, Section D requires an organization chart for each
> branch office. On a nationwide/worldwide contract, Weston would have to
> provide over 50 organization charts. Could the requirement be amended to
> allow one organization chart appropriate to the program management of the
> contract?
>
> CONCLUSION
>
> In general, the SF330 does not lend itself well to nationwide Indefinite
> Delivery/ Indefinite Quantity (ID/IQ) or broad scope of work contracts.
> Weston has no problem with the SF254/255 as they are currently used. Our
> experience is that the time consumption in completing the forms is not
> related to the complexity of the forms, but rather to the complexity of
> the proposed opportunity. Change in format from SF254/255 may result in
> greater time and dollars spent in proposing. Also, the use of the singular
> SF330 form, rather than the two SF254/255 forms, may result in an SF330
> format too simplified to provide adequate best value information to
> federal agencies.
>
> Thank you for reviewing our comments. If you require any additional
> information, please contact me at 610-701-3123.
>
> Very truly yours,
>

408-77

> ROY F. WESTON, INC.
>
> Patricia J. Geary
> Federal Sales Director
> gearyp@mail.rfweston.com
> 610-701-3123
> 610-701-3158 fax
>
>

ACSM

2000-608-78

American Congress on Surveying and Mapping
6 Montgomery Village Avenue, Suite 403
Gaithersburg, MD 20879

(240) 632-9716 • Fax (240) 632-1321
Internet: http://www.acsm.net

January 4, 2002

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW
Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

RE: FAR Case 2000-608

Dear Ms. Duarte:

The American Congress on Surveying and Mapping (ACSM) is a national professional association of more than 6,000 individuals practicing in the fields of cartography, geodesy, geographic information systems, and surveying/mapping. Our members practice within the public and private sectors, and represent a broad cross-section of the diverse aspects of the surveying and mapping community. Many of our members are contractors to the various local, state, and federal governmental entities, and some represent those entities in the procurement of professional services process.

ACSM appreciates very much the opportunity to comment on the proposed SF 330, for Architect-Engineer Qualifications.

In general, we find the proposed SF 330 to be a very well conceived and thought out document. We believe it to be a significant improvement over the existing SF 254/255 documents. Those documents, while adequate for their intended purpose, are at times redundant and at other times do not provide the specific information required for fair analysis of competing firms' qualifications.

We do find, however, that the proposed SF 330 falls short in its treatment of the surveying and mapping profession. We believe that surveying and mapping services, as included in the "Brooks Act" and FAR definitions for architect-engineering services, command more attention within the List of Disciplines (Function Codes) and List of Experience Categories (Profile Codes) of SF 330. This action will provide to both the submitting firms and the evaluation teams an ability to more fully consider the firms' personnel and experience relevant to the proposed project.

Rec'd 1-7-02

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The attached recommendations have been jointly developed by ACSM, the American Society for Photogrammetry and Remote Sensing (ASPRS), and the Management Association for Private Photogrammetric Surveyors (MAPPS). It is our understanding that ASPRS and MAPPS intend to file separate, but similar comments in support of our unified recommendations.

Our congratulations are extended to the team responsible for the development of SF 330, and urge its approval with the attached recommendations.

Sincerely,

Curtis W. Sumner

Curtis W. Sumner, LS
Executive Director

608-78

Recommended SF 330 Changes RE: Surveying and Mapping

Revise the List of Disciplines (Function Codes) by striking:

Cartographers
Geodetic Surveyors
Geospacial (sic) Information Systems Specialists
Topographic Surveyors

And re-organizing them in a new list with a general category and sub category, just as the form proposes for Engineers. Our proposal is to list surveying and mapping disciplines as follows:

Surveyor and Mapping Scientists:

- __ Aerial Photographer
- __ Cartographer
- __ Geodetic Surveyor
- __ Geographic Information Systems Specialist
- __ Hydrographer
- __ Image Analyst/Photo Interpreter/Photo Lab Specialist
- __ Land Surveyor
- __ Photogrammetrist
- __ Remote Sensing Scientist

We would also suggest adding a general category for "Engineering/Design Software Developer"

Revise the List of Experience Categories (Profile Codes), by striking:

Aerial Photogrammetry
Construction Surveying
GIS Development/Analysis
Hydrographic Surveying
Land Boundary Surveying
Surveying: Platting, Mapping; Flood Plain Studies
Topographic Mapping

And re-organizing them in a new list with a general category and sub category. Our proposal is to list surveying and mapping disciplines as follows:

Surveying and Mapping

- ___ Aerial Photography & Airborne Data and Imagery Collection and Analysis
- ___ Cartography
- ___ Charting (Including Nautical and Aeronautical)
- ___ Close Range or Terrestrial Photogrammetry
- ___ Construction Surveying
- ___ Digital Orthophotography
- ___ Digital Elevation & Terrain Model Development

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___ Environmental & Natural Resource Mapping (habitat, natural and man-made phenomena)
___ GIS Services: Development/Analysis/Data Collection
___ Geodetic Surveying (Ground and Airborne GPS)
___ Geospatial Data Conversion (including scanning, digitizing, compilation, attributing, scribing and drafting)
___ Hydrographic Surveying
___ Land Surveying
___ Location/Addressing Systems
___ Photogrammetry
___ Remote Sensing
___ Topographic Surveying and Mapping

Flood Plain Studies should be a separate, independent category and a new separate, independent category should be established for Environmental Planning.

2000-608-79

"Pam Ekey"
<pekey@hornershifrin.com>
01/04/2002 09:42 AM

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR case 2000-608 comments

General Services Administration
FAR Secretariat (MVP)
Attn: Laurie Duarte

Re: FAR case 2000-608

On Page 10, Section F - Project Examples, Item 29 asks for the amount of **professional fees** and **construction costs** for each project listed in this section. We areconcerned that the information requested could be used to calculate pastfees as a percent of construction cost. This, in turn, could be used tocompare the fee structure of firms, thus influencing the selection processand circumventing the intent of Qualifications Base Selection procedures inviolation of the Brooks Act. We respectfully request that the Committeereconsider the requirement to include this information.

Pam Ekey, CPSM
Manager, Business Development
Horner & Shifrin, Inc.
5200 Oakland Avenue
St. Louis MO 63110
Phone: 314/531-4321
Fax: 314/531-4321
www.hornershifrin.com

2000-608-80

"Clark, Evie" <CLARK@alaska.coffman.com>

01/04/2002 03:00 PM

To: '"farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: FW: Proposed SF330 to replace SF254 and SF255

In addition to comments previously sent from the Alaskan A/E community... here are more comments from our peers in Spokane, WA area...

Evelyn P. Clark, CCA
Coffman Engineers, Inc.
800 F Street
Anchorage, Alaska 99501
907/257-9242 Direct
907/276-6664 Main
907/276-5042 Fax
clark@alaska.coffman.com
www.coffman.com

-----Original Message-----
From: Van Vleet, Jennifer [mailto:vanvleet@spokane.coffman.com]
Sent: Friday, January 04, 2002 10:55 AM
To: Clark, Evie
Subject: RE: Proposed SF330 to replace SF254 and SF255

Thanks. Here is our stuff from Spokane.

- SF 330 comments.doc

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Marketing Associates of Spokane – membership responses….

I don't like the change in the Profile Codes, as I have put profile codes w/ projects in my data base.

I share the concerns of:

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Too small of form/boxes to present information. Hence too small of font to get stuff in there, or stuff will have to be left out.

Other than my total agreement w/ these items of theirs (and the rest of the list too!) I have no new complaints/concerns to voice.

Thank you for the review.

Kim Jeffries, Admin./Mktg.Secretary
Architects West, Inc.
210 E. Lakeside Avenue, Coeur d'Alene, ID 83814
Ph: (208) 667-9402 Fx: (208) 667-6103

I think the Alaska group has raised some valid concerns that I share. I will spend a little more time with them but so far I have nothing to add. Happy New Year if I don't talk to you between now and then.

Julie Culver
Riley Engineering
Spokane, WA

Potential Problems:

Part I:

1 & 2 (page numbering)– Currently the prime typically gathers completed 254's and 255's from their consultants, collates the package and sends one team proposal. If each firm's Part I is signed and sequentially numbered then each team firm has to know the exact number of sheets they are submitting early in the process. For instance: hypothesize that the structural firm is asked to number their sheets starting with #8 and that there are 20 sheets total. They print and sign their information and send it to the prime. If at the last minute a new consultant is added, the entire rest of the team's information is incorrect, there are now multiple new pages, possibly in the middle of the proposal. The prime would need to have electronic files and signatures for each of the firms to be able to correct the numbers and reprint. This doesn't save time or money.

E. Resumes - question 16. This space is very small to describe someone who might do – cost estimating, specifications, project management, and construction management all on the same project. There does not appear to be a forum for an employee's work with a past employer to be used or emphasized. Individuals are hired for what they bring to the firm but then that

608-80

information seems inadmissible in this format. Can their 5 relevant projects be with another firm?

The information required for firms with branches seems repetitive and exhaustive.

F. Example Projects – General Service contracts typically have multiple locations that cannot be written within this space.

G. Key Personnel – I agree with a previous concern that this section could cause firms to only submit Principals and retained employees resumes for specific project personnel. New or younger employees will not be used because the completed matrix would then appear empty. Additionally, clients may believe that only Principals and long-term employees will be working on their projects, obviously the perpetuation of the industry requires that younger employees work on projects. This matrix may also look more favorable for older, larger firms. These firms simply have more principals and long-term employees to list, thus a more full matrix.

In general the allowed fields are very small for the information requested. The respondent text will either be very small or incomplete.

The degree to which individual agencies or those requesting the SF330 can tweak their request seems significant. Part of the work/paperwork burden of the 254's and 255's is that each entity wants something a little different, photos, no photos, page limitations etcetera. Therefore each "standard" form is tweaked and individualized for that proposal. This also leaves the information open to "fudging." Twists can be put on the information to look more favorable to each selection group.

Cross referencing the photos as attachments could cause problems. If you attach a photo for each individual persons 5 listed projects and have 5 submitted resumes that is 25 pictures. Then if a firm submits 10 projects and each has a photo that is a total of 35 pictures. Where do all of these pictures go and if you have repeat pictures do you only submit it once and let the reviewer search for the picture by the project name?

Generally there does not appear to be any major advantages in time or money with the SF330 over the 254's and 255's. What about trying an approach that is used by many entities around the country, a database? We are a fortunate society that has wonderful technological capabilities available to us so lets use them. Most firms have established databases of their projects that contain most of the information requested in the SF330. Could the government create a database that each firm updates each year or quarter and use that for an initial selection cut in their process? Imagine this scenario: a government agency needs a consultant team so they submit an RFQ. A & E firms respond with a simple letter of interest. This list of interested firms is then searched by the requesting agency. The agencies set of criteria is used to select an appointed number of firms to either submit proposals or interviews. Essentially, only 5-6 firms burden the expense of submitting a proposal rather than 12 or 15. If the "typical" information is only submitted once or twice a year it removes the burden of reproducing the same information over and over. As a prime firm we create 2-4 proposals a month, if each SF330 takes 29 hours and you submit an average of 3 proposals/month that is 87 hours of work/month. That would require a part time person to submit proposals, and only the projects your firm is awarded pays this individuals salary. This is a larger burden on small firms. It would also eliminate the opportunities to "fudge" and "twist" information. Firms with greater resources can typically dedicate more time and money to "dressing up" proposals. There are different ways of selecting A & E firms besides the 254's and 255's or these forms disguised in vertical format. An

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electronic filing database may be the best way to truly reduce the work/paperwork burden of the A & E selection process.

3E Design Group P.S. - Spokane

2000-608-81

"Brook Mayfield at LSI Network" <Brook@livingstonslone.com>

01/04/2002 03:12 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: Proposed SF330 to replace SF254 and SF255

I believe that this product, the SF330,is pretty awful and I certainly hope you rethink your process in the future. In addition, the form should be scrapped. Finally, I believe strongly that you, as an organization, should sit down and fill out an SF330 as you would expect the A/E firms to do so and then give it to someone else on your committee to try to read them. Also, don't forget to figure in the cost for the photos.

Attached are a few comments. I will be sending more.

Thank you

Brook Mayfield
Livingston Slone

Part I:
1 & 2 (page numbering)- Currently the prime typically gathers completed 254[1]s and 255[1]s from their consultants, collates the package and sends one team proposal. If each firm[1]s Part I is signed and sequentially numbered then each team firm has to know the exact number of sheets they are submitting early in the process. For instance: hypothesize that the structural firm is asked to number their sheets starting with #8 and that there are 20 sheets total. They print and sign their information and send it to the prime. If at the last minute a new consultant is added, the entire rest of the team[1]s information is incorrect, there are now multiple new pages, possibly in the middle of the proposal. The prime would need to have electronic files and signatures for each of the firms to be able to correct the numbers and reprint. This doesn[1]t save time or money.

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608-81

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- SF 330 comments.doc

608-81

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608-81

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3E Design Group P.S. - Spokane

2000-608-82

ACEC

AMERICAN COUNCIL OF ENGINEERING COMPANIES

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW
Room 4035
Washington, DC 20405

Re: FAR Case 2000-608, New Consolidated Form for Selection of Architect-Engineer Contractors

Dear Sir/Madam:

Thank you for the opportunity to comment on the new consolidated form for the selection of architect-engineer contractors. The American Council of Engineering Companies (ACEC) represents over 5,600 engineering companies throughout the United States. ACEC member firms range from small firms to large multi-disciplined companies that operate globally. Regardless of size, most of our members firms are actively engaged in work for Federal clients.

General Comments:

ACEC has received numerous comments from member firms regarding the proposed SF330 form. Many have stated that the new form does not streamline the process but instead requires that contractors provide even more information when responding to RFP's. The consensus among member firms is that the implementation of the proposed SF330 would pose a significant burden on the a/e community. ACEC requests that the proposed changes to SF 254/255 be reconsidered.

If it is decided to move forward with the proposed SF 330 form, ACEC is concerned about the implementation process. The Federal Register announcement regarding proposed SF330 only mentions three Federal agencies that will be impacted by the proposed rule -- DoD, NASA, and GSA. ACEC strongly suggests that should a decision be made to implement the SF 330, all Federal agencies would be required to adopt the form at the same time allowing for a transition period.

In the background information published on page 53314 of the Federal Register, it was stated that the proposed rule will create six significant changes. These changes and ACEC's comments are listed below.

A. Merges the SFs 254 and 255 into a single streamlined SF 330. ACEC believes that the proposed SF330 will increase the cost of responding to CBD announcements. The proposed form requires more information than the current SF 254/255 forms, particularly if the emphasis on branch offices is not eliminated (see comments on Part I, Section C) and will require more pages in a proposal due to new formatting requirements. Member firms see no streamlining benefit as the proposed SF220 form closely mirrors information currently in the SF 254/255 forms. Many responded that it will be a burden on a/e firms to spend the amount of time required to develop new formats for the same information.

B. Expands essential information about qualifications and experience such as an organizational chart of all participating firms and key personnel. The requirement for an

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"organizational flowchart" showing each firm (and each branch office) is confusing. To list all of the branch offices on a chart gets unwieldy, and we do not understand its value to the government. ACEC recommends the government continue to simply require an organizational chart, without requiring the listing of all participating firms and branch offices on the chart.

C. Reflects current architect-engineer disciplines, experience type and technology. The revised experience code numbering affects the databases that many member firms have built over the years. Though this is expected to be a one-time cost, it will present an economic hardship to many smaller firms.

D. Eliminates information of marginal value such as a list of all offices in a firm. The proposed SF330 form now requires a separate form for each branch office. This is arguably even more burdensome than a listing of offices. ACEC strongly recommends the elimination of this requirement and have firms submit only one Part II for the entire firm or a limited number of Part II forms for major business activities.

E. Permits limited submission length thereby reducing costs for both the architect-engineer industry and the government. No comment.

F. Facilitates electronic usage by organizing the form into data blocks. The new form will be difficult to manipulate due to space limitations

Detailed Comments:
Page 53323 - 53327: Part 1

A. Section C. Proposed Team

ACEC member firms raised concerns about this section's requirement of a listing of each branch office. Many firms, particularly large engineering companies, have multiple offices that often function as work centers, not profit centers. Branch offices are often a place where people work though accountability rests with a business unit that may not necessarily be located at that office. Therefore, we do not believe the listing of branch offices in Section C as "Team Members" makes sense. If a listing of branch offices is required, then we recommend that the requirement to list branch offices in Section C be limited by "branch offices with significant roles on the team." We see no advantage to the government to have a listing of numerous branch offices that have limited involvement in the project.

Furthermore, ACEC recommends that the role of each firm that will be involved in performance of this contract needs also be specified/defined (i.e., prime, sub, specialty and whether the firm is a small business, women owned business, Hub-Zone Business, or Vet-Owned Business).

B. Section D. Organization Chart of Firms and Key Personnel

Many firms did not understand the requirement for an "organizational flowchart" showing each firm (and each branch office) listed in Section C. To list all of the branch offices on a chart gets unwieldy. It is recommended that the government continue to simply require an organizational chart, which can be prepared by the firm commensurate with the scope of work and requirements of the government in the announcement, and if required by the contracting agency, that the firm affiliation and office location for each person be identified on the chart. Or alternatively, the government should consider allowing firms to highlight the branch office that will be most involved with the contract.

C. Section E. Resumes of Key Personnel Proposed for This Contract

For senior personnel, there's inadequate space, unless information desired is project specific.

D. Section F. Example Projects Which Best Illustrate Qualifications
Item 26 and 27: Per existing 255, consultants to prime often do not have this information.

Item 28: The directions for provision of photographs is not consistent with the form question. There is the implication that points will be taken off if a photo is furnished and not requested.

Item 31: Adding team member firms that have worked on each project is not an onerous requirement, but some firms believe that it will force prime contractors to naturally select sub-contractors with whom they have worked in the past. This section may make primes more tempted to contract with firms with whom they have worked before, in lieu of teaming with a specialist, perfectly suited for that contract, but with no prior experience with the prime. They may even keep contracting with a mediocre firm simply because they may fear teaming with a new sub-consultant.

E. Section G. Key Personnel Participation in Example Projects
This does not reflect firms having worked together; possible a very experienced new hire is proposed, but who has never worked with prime firm. Firms may also have worked together successfully on many projects, but not on project examples. This section discriminates against new alliances, particularly large firms with small business.

Page 53329: Part II

a. The regulation is unclear as to the meaning of the term "revenue." Currently, the SF254 requires "fees" rather than revenues, which are viewed as the funds committed by the Federal government when awarding a contract. We recommend that the Part II continue with the use of fees, not revenues.

b. The regulation does not indicate the frequency of updating Part II. Contractors currently update the SF254 annually, and therefore we assume this will not change with the Part II. If this is not the intent, more frequent updates will put a greater burden on contractors.

c. We are unclear as to how Part II will be linked to the firm's ACASS number. This needs to be clarified.

d. Item 7 should refer to block 2a; there is no "3a".

e. Item 8a –8c. Six years is restrictive for firms in business more than six years with several name changes.

f. Item 9. The number of projects is more important than revenue, particularly for small businesses

Again, thank you for the opportunity to comment on the proposed SF330.

Sincerely,

Camille Fleenor
Director, Federal Procurement Policy

2000-608-83

United States Department of State

Washington, D.C. 20520

Office of the Procurement Executive
Suite 603, State Annex Number Six

January 8, 2002

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW
Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

Subject: FAR Case 2000-608

Dear Ms. Duarte:

The Department of State submits the following comments on the subject FAR Case. Overall, the Department believes that the consolidation of the SF-254 and SF-255 is a welcome revision and will reduce the redundancies of these two forms favorably. The comments below are from individuals in both our acquisition community as well as technical personnel in the Office of Overseas Buildings Operations.

1. The text for the SF-330 indicates that the form is set up to facilitate electronic media, but it does not state that it would be published as such. It seems that at this point in time, there should be a mechanism for the USG to publish the form as a web-based application. We recommend that this be done to allow for both e-forms on the Government and public sector sides.

2. List of Disciplines (Function Codes) on page 5. We recommend that under Engineers, the terms "Soils (30)" and "Foundation/Geotechnical (23)" be deleted, and replaced with Geotechnical. Since the early 1970s, Geotechnical Engineering has formally encompassed both soils and foundation engineering.

Thank you for the opportunity to comment. Should you have any questions concerning our comments, please contact Gladys Gines of my staff. Ms. Gines may be reached by telephone at (703) 516-1691, by fax at (703) 875-6155, or by e-mail at ginesgg@state.gov

Sincerely,

Lloyd W. Pratsch
Procurement Executive

Recd 1/8/02

THE AMERICAN INSTITUTE OF ARCHITECTS

2000-608-84

January 8, 2002

Laurie Duarte
FAR Secretariat (MVP)
General Services Administration
1800 F Street, NW, Room 4035
Washington, DC 20405

Dear Ms. Duarte:

I am writing to submit The American Institute of Architects' (AIA) comments for the record on the Federal Acquisition Regulation; New Consolidated Form for Selection of Architect-Engineer Contractors [FAR Case 2000-608] (48 CFR Parts 1, 36, and 53). Enclosed please find a paper copy of our statement, along with a disk that contains our comments in electronic format.

AIA members compose a broad cross-section of architects responsible for the design of many types of federally contracted projects covered by the proposed rules. The rule changes being considered in conjunction with the replacement of Standard Forms 254/255 with Standard Form 330 will have a direct impact on the architectural profession. The AIA solicited comments from our members and formed a task force to review Standard Form 330. Enclosed you will find the AIA's final comments.

The AIA is pleased that the government has taken steps to revise the current forms. The AIA has serious concerns, however, that the requested information in the Professional Services section will allow an agency to pre-judge a firm based on previous costs and fees charged without allowing the firm an equal opportunity to compete. In addition, the Proposed Team section restricts the applying firm to people it has used previously, whether or not they would be the best for the project. And lastly, from an organizational perspective, our members have expressed concern with regard to the page numbering and the number of hours it will take to complete the document.

The AIA looks forward to working with you on this issue to ensure that the new form is best for both the government and the private sector. Thank you for the opportunity to comment on this most important subject.

Sincerely,

Lisa E. Blackwell

Lisa E. Blackwell
Managing Director
Government Affairs

Enclosures

Rcvd
1-8-02

608-89

The American Institute of Architects

Standard Form 330 Task Force

Comments to the Notice for Proposed Rulemaking [FAR Case 2000-608]

Federal Acquisition Regulation; New Consolidated Form for Selection of Architect-Engineer Contractors

January 8, 2002

Part	Section	Title	Page Number	Comment
Specific Instructions	Part II-General Qualifications	Ownership	4	Include in the instructions all necessary information to complete the form. The small business categories and the NAICS codes and descriptions for small business categories referenced in the Federal Acquisition Regulations, FAR Part 19, should be included in the instructions.
Specific Instructions	Part II-General Qualifications	Annual Average Professional Revenues	4	Include in the instructions all necessary information complete the form. The referenced sections of the Federal Acquisition Regulations, FAR Subpart 19.1, concerning new firms should be included in the instructions.
I		List of Disciplines (Functional Codes)	5	If one accepts the logic of grouping Engineering disciplines together, then group the Scientific disciplines and the Design ones together as well. Under "Scientists," include 03 Biologists, 06 Chemists, 10 Ecologists, 35 Environmental Scientists, 37 Geologists, 41 Hydrologists, 42 Industrial Hygienists, 45 Oceanographers, and 52 Toxicologists. Under "Designers," include 02 Architects, 43 Interior Designers, 44 Landscape Architects Disciplines 18, Cost (Estimators), 34 Value, and 31 Specifications do not belong solely to the Engineering discipline and should stand alone or just as easily with "Designers" or "Architects." Add the following disciplines:

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				Graphic Designer (relates to Profile Code G05) Historic Preservation Specialist (relates to Profile Code H08) Archaeologist (relates to Profile Code E01) Commercial Concessions Planner (relates to Profile Code 08) Conveying Systems Consultant (relates to Profile Code E05) Plumbing [engineer] (relates to Profile Code P06) Lighting Design Consultant (relates to Profile Codes L05 and L06) Building Code Consultant Architectural Programming Consultant Materials Handling Consultant (Trash Management) Hardware Consultant Blast Assessment Consultant (no longer just a structural engineer) Exhibit Designer
I		List of Experience Categories (Profile Codes)	6	D04 Design- Build is a project delivery method. If that one is to be included, then the other known ones, should be included as well. Add the following categories: Architectural Programming Construction Services Design Management Design-Bid-Build Construction Management Facilities Management Blast Assessment Add "planning" to the end of A05 and A06 Add "Baggage Systems" to M01 (materials handling systems)
I	D	Organizational Chart of Firms and Key Personnel	8	Explain how the chart aids the development of the project. Identify how the structure will integrate data collection and analysis and help the decision-making process. Identify how the structure will aid in managing the contract. Under "Directions," require listing of the branch offices that will be used specifically for this project. (The firm is covered in Part II.)

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I	C	Proposed Team	8	Previous experience should be included from SF 254/255. The way this is formatted now, unless the same person worked on one of the ten projects you are submitting, it looks like you have no previous experience working together, which will ultimately dilute the team. Each firm's architect, engineer, etc., proposed for the opportunity should be listed.
I	E	Relevant Projects	9	To the description box (4), add "and the value of their firm's billings in dollars and as a percentage of the whole" to "cost." Add (FY___) after "cost." Form should be expandable so that photos can be inserted adjacent to the relevant text. This would make it easier for the proposer to electronically prepare the form, and it would greatly facilitate reading the proposals. To the specific role box (5), include two boxes for checking, labeled as follows: "with current company" and "prior to being with current company."
I	E	Resumes of Key Personnel	9	Under "Relevant Projects" (23) in subsection (3) change "Years Completed" from 3 to 5. Under "Other Professional Qualifications" (22), add more room to allow a narrative description of a person's strengths, what they bring to the team, etc. Under subsection 23, list relevant projects for each key staff person proposed, as opposed to relevant projects for the firm as a whole.
I	F	Example Projects	10	Requesting ten example projects that best illustrate proposed team's qualifications for this contract could put smaller firms at a disadvantage. A range of 5-10 projects would be more appropriate. To the brief description of a project and its relevance to this contract (28), allow the form to be expanded so that photographs can be integrated into the text. Allow more room for description. Also, very restrictive in that you must show each of the consulting firms that are included in Part 1: C that worked on the project in this section. This may restrict your ability to try out new consultants. There are serious concerns that the requested information in subsections 29b and

60884

				30b will allow an agency to pre-judge a firm based on previous costs and fees charged without allowing the firm an equal opportunity to compete.
I	G	Key Personnel Participation	11	Under subsections 34-36, applicable to "Team Projects Performed Together" in Section F, provide the names of key staff being proposed, and then specify each staff person's role in each of the prior projects listed. The language in subsection 36, "Example Projects Listed in Section F," describing how to fill out the table and is confusing.

General Comments	Comment
Minority- and women-owned businesses	Standard form 330 does not take into consideration minority- or women-owned businesses
State and local implications	All parties should carefully and thoroughly evaluate the benefits of changing these forms. Many state and local jurisdictions also use the form. It is pervasive throughout the industry, not just at the federal level. Thus, redoing the form will result in potentially large additional paperwork expenses for all firms who do public work.
Design excellence	SF 330 needs to allow smaller businesses to compete by reducing the number (quantity) of required relevant projects to be listed and increasing the importance of quality delivery in the project listing or the matrix make-up. Examples would be relevant publications, awards, or user-issued recognition for exceptional work performed. Make this a separate box on the form.
Revising SF 254/255 instead of implementing SF 330	It might be better to add a project/personnel matrix form to the current SF 254/255 until a better form is developed. SF 330 appears to simplify the form for the reviewers who must pore through dozens of these applications for each project, but it does not adequately address the proposers' concerns.
Advantages to single-discipline firms and disadvantage to new firms	The SF 330 will only streamline the process for single-discipline firms who go after one or two government projects per year. The form allows no flexibility. It does not encourage building new teams and appears to require firms to use subconsultants they have used on specific projects in the past, regardless of their performance. In addition, it requires 5 projects for individuals with no way for the individuals to show additional experience on specific project types.
Data Entry	First look leads us to believe SF 330 will be somewhere in the nature of an additional 10-15 hours per RFP per firm per solicitation when compared to SF 255 - more for multi-discipline firms. In addition, they are anticipating sending this out as a fillable PDF file. Which means that firms will have to cut and paste rather than use an actual database. In short, the new forms will cost Architectural and Engineering Firms hundreds of thousands of dollars in staff time and preparation of new forms, as well as in changing existing databases to be consistent with the government's requirements for a new form they never even attempted to fill out themselves.
Lack of Adequate Space	Neither form includes adequate space for pertinent information. I understand that the government is trying to

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	simplify the forms, but they are not allowing for room to detail project and personnel information, which many agencies require. The new SF 254 does not allow room to put the names of projects, much less who the work was provided to. I like the format of "Portrait" vs. "Landscape." It makes it easier to include additional materials, if required, in the same format. It would be nice for the government to require everyone to use one program for the forms versus every consultant creating his or her own and having them be different. Especially if they will be asking for the forms electronically.
Remarks on SF 330	The 330 form is an excellent redress of previous weaknesses in the 254/255. It much more carefully and clearly ties the proposed key personnel to the relevant projects of the firm and whether or not they had a role in them. Often it is very difficult to ascertain whether the relevant projects cited by the firm were actually done by the proposed key personnel. It now takes an inordinate amount of analysis to try to learn who did what and when.
Visual State	The graphic design of the form is visually unappealing. It is critical that the form's layout be set up by a graphic designer; preferably one well-versed in how firms will want to use the form. The inability to provide pictures on the project description form is troubling. Having to provide additional sheets with photos could be confusing to the reviewer of the proposal if they are not attached directly to the project form.
General pros and cons	A primary objective for changing the 254/255 and replacing it with the SF 330 should be to increase the efficiency and productivity at A/E firms by reducing excessive paperwork and thus, allowing for improved attention to design. It would be expected that the new form (SF330) should significantly reduce -- not increase -- the time necessary for A/E firms to complete this form. In addition, there should be a clear and simple method to determine accurate pagination. Font size needs to be standardized and easy to read.
Digital Capability	Provide the ability to save, fill out and transmit the form digitally, as well as re-use/maintain the repetitive information more efficiently. Allow digital insertion of multiple pages, such as a Section E for each key person and a Section F for each project, both of which could often be done once and copied for the next submittal. Allow color coding or highlighting text for internal use, with ability to save to file, that is: 1. required separately for each submittal (project specific)

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	2. required annually (firm profile) 3. relatively permanent (firm name, address) The intent here is to expedite updating of information.
Form hinders satellite offices	The new form places a greater importance on corporate offices and hinders satellite offices from procuring contracts.
Perform test run before release	The task force recommends that the responsible agencies first perform a trial run on a diverse set of projects to work out any complications that might arise before implementing them industry-wide.

2000-608-83

"Ratnathicam, Nira"
<Ratnathicam@pbworld.com>

01/08/2002 08:22 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc: "'cfleenor@acec.org '" <cfleenor@acec.org>
Subject: Comments on Proposed SF 330 Forms

Attn: Laurie Duarte

As requested by ACEC, I am sending our comments on the proposed SF 330 forms directly to the e-mail address shown in the publication released for comment.

Nira Ratnathicam, P.E.

- 330.doc

608-83

Re: Comments on Proposed SF 330 Forms As Requested by ACEC

To: Government Services Administration
FAR Secretariat (MVP)
Attn: Laurie Duarte

From: Nira Ratnathicam, P.E.
Parsons, Brinckerhoff, Quade & Douglas, Inc.
Wind2 Software, Inc.

Copy: American Council of Engineering Companies
Attn: Camille Fleenor

Date: January 8, 2002 (Extended Deadline for Comments)

In general, the forms have new requirements that should make it easier for the evaluators. But more information will have to be tracked and provided by the submitting firms. Providing features that make it easier to prepare the proposal using desktop tools (MS Word etc.) will help submitting firms. Below are some overall general comments and more specific suggestions, which we believe, will help improve the forms.

Overall Comment #1
Forms have not been designed with the focus on taking advantage of electronic publishing tools. For example, by putting disparate boxes of information across the same line, if one box has to grow to provide more relevant information, the adjacent short answer box will also grow with empty space.

Please note that both Federal Agencies and submitting firms will expand the format to help them properly present material for a proper evaluation. Your form should be designed to easily accommodate this need in the current electronic desktop workplace.

Design the forms so information blocks can grow or shrink down the page to take advantage of modern electronic publishing tools and address the diverse needs for evaluators and submitting firms.

For example, submitting firms all now have a text and graphic page prepared and ready for use with non governmental proposals. They should be able to just insert this into an area on the form in order to save time.

Overall Comment #2
Certain blocks do not have sufficient space to provide the information needed to make a thorough evaluation. See details below.

Overall Comment #3
Provide enough space for text and associated pictures to be in same block to avoid mix up and make it less cumbersome for the evaluator.

Overall Comment #4
Need flexibility to add unusual Profile and Discipline Codes to standard list.

Detail Comments

	LOCATION	COMMENTS
	PART I	
	E. RESUMES OF KEY PERSONNEL	
	Total Pages	Is this for specific resume, group of resumes or for SF 330 – cover in instructions.

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20a	Degree	Provide space for two 1/3 page width lines or equivalent – currently too limiting for certain types of non-conventional qualifications.
22	Other professional qualifications	Too small – across page is better for non-academic qualifications.
23	Relevant Projects	Good Addition, but...
	Description	Space Too Small – need at least four full width lines to provide useful information. Design the form to provide flexible space height to accommodate smaller or longer project description roles. Space should be full width. Move (5) specific role to another row so it does not take up empty space as descriptions are expanded or shortened.
	[ ] Check if photos attached	Attaching a photo on another page is cumbersome. The evaluator has to flip back and forth between the photo(s) and the text and can get things mixed up. Suggest you provide space to include both text and graphic in one spot. Take advantage of desktop publishing technology. Most submitting firms normally have this prepared and should be able to drop this into the space.
	PART I	
	F. EXAMPLE PROJECTS.....	
28	Brief description of project and relevance to this contract	The space to describe this information is far too small. The average project description submitted by firms can have half a page of text for the project.
28	[ ] Check if photograph of project attached	Attaching a photo on another page is cumbersome. The evaluator has to flip back and forth between the photo and the text. You must provide enough space to insert the photograph into the text page. With the current state of electronic publishing it is more efficient for the preparer and the evaluator. Most submitting firms normally have this prepared and should be able to drop this into the space.

608-83

32	Awards	Space is way to small. Most awards take 2 to 3 full width lines to spell out including project, from whom, why etc.
33	Additional Project Information	Too small – since agencies can expect more detail information on what the specific information that they need.
Page 5	List Of Disciplines (Function Codes)	Must provide flexibility to define other unusual discipline designations not covered. (e.g. Transportation Planner, Coastal Engineer etc.) Suggest D or other designation in front of Code to distinguish it easily from other numeric designations in form. Add the word "Engineer" to this designation in category list so it makes sense when used in the form.
Page 6	List of Experience Categories (Profile Codes)	Need to have flexibility to expand the list to address unusual designations (e.g. Underwater Pipelines, Breakwater Design etc.).
	PART II GENERAL QUALIFICATIONS	
9	Employees by Discipline	Only 20 slots – some large firms such as ours have many more disciplines within each service group and is relevant for certain large projects. Provide a form design, which can expand the number of lines. By limiting to 20 you encourage firms to slot staff in categories, which are not appropriate and misleading to the evaluator. Space to spell out the disciplines is too small (e.g. 38 Geo-spatial Information Systems). *See comment on designing a* flexible form that can expand or contract to suit electronic publishing).

2000-608-86

"Jeanette Y Leung"
<LeungJY@stvinc.co
m>

01/08/2002 05:42 PM

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR Case 2000-608

Attached is STV's comments for FAR Case 2000-608.

If you should have any questions, please contact me at (212) 614-3397.

Thank you.

(See attached file: FAR Case 2000-608.doc)

Jeanette Leung
Marketing Department
STV Incorporated
225 Park Avenue South, 5th Floor
New York, NY 10003
Email: leungjy@stvinc.com

- FAR Case 2000-608.doc

608-86

STV Incorporated
225 Park Avenue South
New York, New York 10003
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FAR Case 2000-608

The following is a list of questions for clarification and comments for FAR Case 2000-608 to be considered in the formulation of a final ruling.

SF 330 - Part I (Contract Specific Qualifications)

With the understanding that one of the purposes of developing this SF 330 is to reduce paperwork, we have found sections that create more paperwork than was required on the original SF 254 and 255 combined. Information requested is either duplicated or summarized versions of particular sections. Furthermore, the SF 330 requires information to be entered into the various fields. Overall, the text blocks are too small. Can text blocks and font size be expanded or can we provide additional sheets as attachments for all sections of this form? Most importantly, it is not a standard form. For example, photographs may be permitted; they may not be permitted. This makes it necessary to have two of the same item. For example, a project description on project X, without a photo, and a project description on project X, with a photo. Additional examples include the following:

Section A – Contract Information

1. *Question No. 3 – Title.* Is this area expandable? Fitting the title of the project in the allotted space would be challenging.

Section D – Organization Chart of Firms and Key Personnel

1. The information requested is not clear. For example, the instructions for this section reads, in pertinent part, "present an organizational flow chart." What is being requested, an organization chart, a flow chart (they are two separate and distinct items as one shows organization and one shows a process), or an organizational flowchart? If it is an organizational flowchart, define what that is and how it differs from an organization chart or a flowchart.

Section E – Resumes of Key Personnel and Section F – Example Projects Which Best Illustrates Proposed Team's Qualifications for this Contract

The space given to the consultant for resumes is prohibitive. If this is the size that the GSA chooses, more agencies will start doubling up on resumes (both SF 330 and long form). Can we provide additional pages for resumes or is it a one-page limit?

1. *Question No. 23 – Relevant Projects.* These sections break out the description of the project (No. 4) from the key personnel's role (No. 5). These two elements compose this person's relevance to a project and by separating them, it dilutes and generalizes work that is specific to their experience. This section would be better combined as "Description of Specific Role."

2. *Question No. 23-4 and No. 28.* Are photos supposed to be inserted here or on a separate page? The same remarks concerning space are applicable here. This is another section which requires the splintering of information that is usually prepared and saved as a single document, i.e., photos usually accompany a detailed description of a relevant project. By requesting the separation (or not) of a photo, this will require the complete revamping of all firm's database of projects. If this tedium were to really be required, then what format are these photos required to be in? Electronic (jpeg, tif, etc.) or hard copy (4x5, 8x10, etc.)? This section could be simplified without a check box for photos. Agencies that we have worked with have generally specified whether to use color graphics. By

adding what may appear to be a simple check box, in actuality leads to undue hardships for all firms, especially those with large databases of projects. However, if there was a separate box within which photos were to dropped, then this would not add too much additional work, just a structure for the form instead. Furthermore, this form could be more functional if it could accommodate pictures, if necessary, because no one wants to flip back and forth between the project description and photo, and try to establish a relationship between the two.

3. *Question No. 27 – Project Owner's Point of Contact.* For the project owner's email addresses, "if applicable" should be added in parentheses. Most firms do not have a listing of agency contacts' email addresses and not all agencies have internet or email capabilities.

4. *Question No. 28 – Brief Description of Project and Relevance to this Contract.* Again, space is too small (you're supposed to describe the project *and* describe the relevance to the current project? Other than fragmented sentences, I don't think there's much room to communicate). How much information can be provided? Can the space be expanded to include more detailed descriptions?

5. *Question No.* 32 and 33. Is this area expandable? Otherwise it is not practical to expect most firms to cram information within the allotted space.

Section G – Key Personnel Participation in Example Projects

1. This section appears to be a summary of Sections E and F. The matrix depicts both the names of key personnel and role in the contract as requested in Section E. In addition, information from Section F will be incorporated into the Matrix. Can this be eliminated to reduce redundancy?

2. The key personnel chart is severely constraining in limiting key personnel qualifications to be a part of the consultant's 10 best projects. For instance, the company may want to show overall experience in educational facilities for a CUNY A/E On-Call Services proposal, but on a fire protection resume for that proposal, we will want to show fire protection experience that would never make it into the top 10 company projects for a CUNY A/E On-Call proposal, like Rikers Island Fire & Life Safety or NJDPMC Woodbridge Center. Another example, what if STV hires a specialist in academic programming, on the form provided, how can his expertise be demonstrated when there is only firm qualifications to check off, not individual qualifications.

SF 330 - Part II (General Qualifications)

Question No. 9 – Employees by Discipline

1. Are we limited to the space provided or can we expand the information to 30 projects, as required on the Standard Form 254?

2. If we add codes specific to our firm, how do we handle assigning function codes?

Question No. 10 – Profile of Firm's Experience and Annual Average Revenue and Question No. 11 – Annual Average Professional Services Revenues of Firm

1. *Question No. 10A – Profile Code.* We have amended the List of Experience Categories (Profile Codes) to include profile codes that our firm has experience in the various areas not covered on the list. The following is a list of profile codes not provided on the list. Can you please add the following to your list or identify GSA's corresponding profile code.
   - Architecture
   - Construction Inspection
   - GIS
   - Technical Manuals

2. *Question No. 10B – Discipline.* Does the term "Experience" relate to profile code descriptions or the firm's specific projects?

3. *Question No. 10C – No. of Employees (1) Firm and (2) Branch.* For clarification, does the Revenue Index Number refer to annual revenue for a particular profile code or is it project specific?

4. *Question No. 10C – Revenue Index Number.* You are requesting information for the last five years. *Question No. 11.* You are requesting information for the last three years. For consistency, wouldn't it be better to provide information either for the last three years or last five years in both of the questions addressed?

In conclusion, the form is not "streamlined" as claimed. It is has numerous boxes, as it jumps back and forth from boxes to matrices, from Roman numbers to Arabic numbers, from outline form to list form. For example, on the first page alone (page 8), the section identification changes from numeric (for example, 1 and 2), to alpha and numeric, (for example, A3-6) to alpha, alpha, and numeric (for example C. a. 12-14). As a suggestion, numbering from one to whatever would make the form easier to follow.

The language is also not consistent. For example, Part I uses the language, *Name* and *Title* for the Point of Contact. Then Part II uses the language, *Point of Contact Name* and *Point of Contact Title*. Why not Point of Contact Telephone Number? Is it necessary to keep restating, Point of Contact?

Additional information as requested is also not consistent. For example, Part I request the point of contact's telephone number, fax number, and email address. Part II requests only the telephone number and email address. Why not the fax number, too? Another example of inconsistent requests is shown on Part II, Question No. 7. It requests information for the "Name Of Firm (If block 3a is a branch office)." There is no block 3a on Part II, or Part I.

Another suggestion is having one single form that is progressive in design. Meaning, you complete sections 1 through whatever for general qualifications, and you continue if the form is for a specific project. Then the form has only one numbering system, one signature, and one date.

Furthermore, making it a standard form so that it is not necessary to revise the form per every agency's request would be suggested. For example, limit the number of project to 10, to 12, to whatever. Language such as "present as many projects as requested by the agency, or 10 projects, if not specified" is not standardizing the process.

2000-608-87

"Eileen Hughes" <ehughes@sesenviron.com>

01/08/2002 04:42 PM

To: farcase.2000-608@gsa.gov
cc: "Michele Marchica" <mmarchica@sesenviron.com>, "Eileen Straughan" <estraughan@sesenviron.com>
Subject: Comments on FAR case 2000-608

Straughan Environmental Services, Inc.
3905 National Drive
Suite 370
Burtonsville, MD 20866
301.989.3265 voice
301.989.3271 fax

- Letter to Councils.PDF
- Attachment 1.PDF
- Attachment 2.PDF

January 8, 2002

608-87

From: Straughan Environmental Services, Inc.
3905 National Drive, Suite 370
Burtsonsville, MD 20866
Voice: 301.989.3265
Fax: 301.989.3271

To: The Civilian Acquisition Council and the Defense Acquisition Regulations Council (Councils)

Re: Federal Acquisition Regulations; New Consolidated Form for Selection of Architect-Engineer Contractors
FAR case 2000-608

Via: Electronic submittal at: farcase.2000-608@gsa/gov

Straughan Environmental Services, Inc. a small and certified disadvantaged business appreciates this opportunity to comment on the subject FAR case concerning the proposal to amend the Federal Acquisition Regulation (FAR) to replace SF 254, Architect-Engineer and Related Services Questionnaire, and SF 255, Architect-Engineer and Related Services Questionnaire for Specific Projects, with SF 330, Architect-Engineer Qualifications.

As a small business, we use these forms not only to help federal, state, and local agencies understand our capabilities, but also to help our prime consultants understand how we might be able to support a project team.

We agree with the Council's general goals for creating a new form. The existing 254/255 forms <u>are</u> in need of an update. The proposed SF 330 has merit: it is shorter, the format is computer-friendly, and there is greater opportunity to clearly define the roles and experiences of key staff and subconsultants.

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While we generally support the Council's proposal, we have several specific comments regarding its structure and the Council's estimate of the economic impact of the change.

1. Regarding the cost of change: The cost to small businesses, such as ours, would not be minor. We have geared all of our data files toward production of the old forms and spent thousands doing it. Note that the complexity of this task is reflected in the fact that there $18,000 software programs that are designed to help firms manage the existing forms! We are not unhappy to see the old forms replaced, but we estimate that manipulating our data for the new form will require an initial investment of approximately $10,000 in labor. This represents a significant percentage of last year's annual income of $1.4 million. We suggest that government consider grants/support to small businesses to allow this data transformation.

2. Regarding Part I: We applaud requiring an organization chart for the project. As a minority business, we are frequently asked to participate in proposal development in order to meet a requirement for minority business participation, but then are never included in the actual project. Requiring the definition of the role of each subconsultant enhances our chances of obtaining substantive meaningful work. This requirement is tremendously supportive of small businesses.

3. Regarding Part I, Discipline Codes: Eliminate the codes that are reflect internal management functions; this are more appropriately expressed in resumes (e.g., project manager, scheduler, risk assessor…) Clarify the definition of technicians and analysts. These terms are vague. Also, consider combining ecologist and environmental scientist. These disciplines overlap. Finally, leave room for a self-defined (or agency – defined) code.

4. Regarding Part I, the experience codes: The type of project (e.g., airports, harbors, etc.) and the experience should be separated out. For example, our firm regularly conducts water resource studies at airports. The Councils could even use the same Discipline Code list used to identify staff profiles. This would allow us to demonstrate the types of facilities that we support and how we are supporting them. Choosing which code to allocate our experience to is confusing, and does not really accurately portray our depth in either category that we have to choose. This is generally how

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we track business data anyway: by client, project type, and by type of service. See examples of a suggested structure in our attachment.

5. Regarding Part I, Section E (Resumes) Expanding the description space for Item 23, Relevant Projects, as shown in the attached example, would allow a more economic use of space on the page, which allows more room for information while saving trees!

6. Regarding the format of Part II: As mentioned previously, we are often a subconsultant on a team. Having an agency review our SF254 as part of the team submittal is an excellent way for us to gain more exposure to agencies. We request that you modify the form to allow additional detail regarding projects. In addition, we believe additional information on Part II would enhance the ability for a contracting officer to make a fair and logical selection of qualified firms for project that fall below thresholds or do not require public announcement.

We very much appreciate your consideration of our comments from the small business perspective, and look forward to a streamlined, easy to use form.

Sincerely,
STRAUGHAN ENVIRONMENTAL SERVICES, INC.

Eileen K. Straughan, President

Attachments

Attachment 1
Proposed Change in Activity Reporting
submitted by:
Straughan Environmental Services, Inc.
3905 National Drive, Suite 370
Burtonsville, MD 20866
301.989.3265

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Suggested Experience Code Format

Project Type	Project Type Code
Airports; Navaids, Airport Lighting, Aircraft Fueling; Paving	AV
Highways; Streets; Parking Lots	HWY
Laboratories	LAB
Etc.	

Reporting Format Example:		**Dollar Value (thousands)**
By Project Type	AV	$2.2
(Use alpha project code)	HWY	$3.1
By Activity	1112	$6.5
(Use numeric discipline code)	35	$8.2

Attachment 2
Sample Resume Format
submitted by
Straughan Environmental Services, Inc.
3905 National Drive, Suite 370
Burtonsville, MD 20866
301.989.3265

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a. Title	b. Location (City and State)	c. Year Completed	
		Professional Services	Construction (if applicable)
Woodrow Wilson Bridge Mitigation	**Washington, DC**	2002	NA

c. Specific Role: Senior Project Engineer for erosion and sediment control design.

d. Description (Brief scope, size, cost)
As mitigation for the SAV impacts of Woodrow Wilson Bridge, supported design of six fish passages to allow migration of anandromous fish. These passages will open blockages that have been in place for hundreds of years and are considered historic sites. Project locations included Rock Creek, Northwest Branch of the Anacostia River, and Sligo Creek. Activities included coordination with National Park Service to protect park values near National Zoo.

2000-608-88

"Young, Scott" <SYoung@aia.org>
01/08/2002 04:24 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: SF 330 Comments

\> To Whom It May Concern:
\>
\> Attached are the comments from the American Institute of Architects (AIA)
\> on the federal acquisition regulation to replace SF 254/255 with SF 330
\> for the selection of architect/engineer contractors. We also dropped off
\> an electronic file and hardcopy earlier this afternoon. Please contact us
\> if you have any questions. Thank you very much.
\>
\> Sincerely,
\>
\> <<SF 330 Cover Letter.doc>> <<SF 330 Final comment form.doc>>
\>
\> ______________________________
\>
\> Scott C. Young
\> Federal Legislative Analyst
\> The American Institute of Architects/AIA
\> 1735 New York Avenue, NW
\> Washington, DC 20006
\> Phone: (202) 626-7404
\> Fax: (202) 626-7583
\> syoung@aia.org
\>

\>
\>
\>

- SF 330 Cover Letter.doc

- SF 330 Final comment form.doc

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January 8, 2002

Laurie Duarte
FAR Secretariat (MVP)
General Services Administration
1800 F Street, NW
Room 4035
Washington, DC 20405

Dear Ms. Duarte:

I am writing to submit The American Institute of Architects' (AIA) comments for the record on the Federal Acquisition Regulation; New Consolidated Form for Selection of Architect-Engineer Contractors [FAR Case 2000-608] (48 CFR Parts 1, 36, and 53). Enclosed please find a paper copy of our statement, along with a disk that contains our comments in electronic format.

AIA members compose a broad cross-section of architects responsible for the design of many types of federally contracted projects covered by the proposed rules. The rule changes being considered in conjunction with the replacement of Standard Forms 254/255 with Standard Form 330 will have a direct impact on the architectural profession. The AIA solicited comments from our members and formed a task force to review Standard Form 330. Enclosed you will find the AIA's final comments.

The AIA is pleased that the government has taken steps to revise the current forms. The AIA has serious concerns, however, that the requested information in the Professional Services section will allow an agency to pre-judge a firm based on previous costs and fees charged without allowing the firm an equal opportunity to compete. In addition, the Proposed Team section restricts the applying firm to people it has used previously, whether or not they would be the best for the project. And lastly, from an organizational perspective, our members have expressed concern with regard to the page numbering and the number of hours it will take to complete the document.

The AIA looks forward to working with you on this issue to ensure that the new form is best for both the government and the private sector. Thank you for the opportunity to comment on this most important subject.

Sincerely,

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Lisa E. Blackwell
Managing Director
Government Affairs

2000-608-88

The American Institute of Architects

Standard Form 330 Task Force

Comments to the Notice for Proposed Rulemaking [FAR Case 2000-608]

Federal Acquisition Regulation; New Consolidated Form for Selection of Architect-Engineer Contractors

January 8, 2002

Part	Section	Title	Page Number	Comment
Specific Instructions	Part II-General Qualifications	Ownership	4	Include in the instructions all necessary information to complete the form. The small business categories and the NAICS codes and descriptions for small business categories referenced in the Federal Acquisition Regulations, FAR Part 19, should be included in the instructions.
Specific Instructions	Part II-General Qualifications	Annual Average Professional Revenues	4	Include in the instructions all necessary information complete the form. The referenced sections of the Federal Acquisition Regulations, FAR Subpart 19.1, concerning new firms should be included in the instructions.
I		List of Disciplines (Functional Codes)	5	If one accepts the logic of grouping Engineering disciplines together, then group the Scientific disciplines and the Design ones together as well. Under "Scientists," include 03 Biologists, 06 Chemists, 10 Ecologists, 35 Environmental Scientists, 37 Geologists, 41 Hydrologists, 42 Industrial Hygienists, 45 Oceanographers, and 52 Toxicologists. Under "Designers," include 02 Architects, 43 Interior Designers, 44 Landscape Architects Disciplines 18, Cost (Estimators), 34 Value, and 31 Specifications do not belong solely to the Engineering discipline and should stand alone or just as easily with "Designers" or "Architects." Add the following disciplines:

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				Graphic Designer (relates to Profile Code G05) Historic Preservation Specialist (relates to Profile Code H08) Archaeologist (relates to Profile Code E01) Commercial Concessions Planner (relates to Profile Code 08) Conveying Systems Consultant (relates to Profile Code E05) Plumbing [engineer] (relates to Profile Code P06) Lighting Design Consultant (relates to Profile Codes L05 and L06) Building Code Consultant Architectural Programming Consultant Materials Handling Consultant (Trash Management) Hardware Consultant Blast Assessment Consultant (no longer just a structural engineer) Exhibit Designer
I		List of Experience Categories (Profile Codes)	6	D04 Design- Build is a project delivery method. If that one is to be included, then the other known ones, should be included as well. Add the following categories: Architectural Programming Construction Services Design Management Design-Bid-Build Construction Management Facilities Management Blast Assessment Add "planning" to the end of A05 and A06 Add "Baggage Systems" to M01 (materials handling systems)
I	D	Organizational Chart of Firms and Key Personnel	8	Explain how the chart aids the development of the project. Identify how the structure will integrate data collection and analysis and help the decision-making process. Identify how the structure will aid in managing the contract. Under "Directions," require listing of the branch offices that will be used specifically for this project. (The firm is covered in Part II.)

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I	C	Proposed Team	8	Previous experience should be included from SF 254/255. The way this is formatted now, unless the same person worked on one of the ten projects you are submitting, it looks like you have no previous experience working together, which will ultimately dilute the team. Each firm's architect, engineer, etc., proposed for the opportunity should be listed.
I	E	Relevant Projects	9	To the description box (4), add "and the value of their firm's billings in dollars and as a percentage of the whole" to "cost." Add (FY___) after "cost." Form should be expandable so that photos can be inserted adjacent to the relevant text. This would make it easier for the proposer to electronically prepare the form, and it would greatly facilitate reading the proposals. To the specific role box (5), include two boxes for checking, labeled as follows: "with current company" and "prior to being with current company."
I	E	Resumes of Key Personnel	9	Under "Relevant Projects" (23) in subsection (3) change "Years Completed" from 3 to 5. Under "Other Professional Qualifications" (22), add more room to allow a narrative description of a person's strengths, what they bring to the team, etc. Under subsection 23, list relevant projects for each key staff person proposed, as opposed to relevant projects for the firm as a whole.
I	F	Example Projects	10	Requesting ten example projects that best illustrate proposed team's qualifications for this contract could put smaller firms at a disadvantage. A range of 5-10 projects would be more appropriate. To the brief description of a project and its relevance to this contract (28), allow the form to be expanded so that photographs can be integrated into the text. Allow more room for description. Also, very restrictive in that you must show each of the consulting firms that are included in Part 1: C that worked on the project in this section. This may restrict your ability to try out new consultants. There are serious concerns that the requested information in subsections 29b and

				30b will allow an agency to pre-judge a firm based on previous costs and fees charged without allowing the firm an equal opportunity to compete.
I	G	Key Personnel Participation	11	Under subsections 34-36, applicable to "Team Projects Performed Together" in Section F, provide the names of key staff being proposed, and then specify each staff person's role in each of the prior projects listed. The language in subsection 36, "Example Projects Listed in Section F," describing how to fill out the table and is confusing.

General Comments	Comment
Minority- and women-owned businesses	Standard form 330 does not take into consideration minority- or women-owned businesses
State and local implications	All parties should carefully and thoroughly evaluate the benefits of changing these forms. Many state and local jurisdictions also use the form. It is pervasive throughout the industry, not just at the federal level. Thus, redoing the form will result in potentially large additional paperwork expenses for all firms who do public work.
Design excellence	SF 330 needs to allow smaller businesses to compete by reducing the number (quantity) of required relevant projects to be listed and increasing the importance of quality delivery in the project listing or the matrix make-up. Examples would be relevant publications, awards, or user-issued recognition for exceptional work performed. Make this a separate box on the form.
Revising SF 254/255 instead of implementing SF 330	It might be better to add a project/personnel matrix form to the current SF 254/255 until a better form is developed. SF 330 appears to simplify the form for the reviewers who must pore through dozens of these applications for each project, but it does not adequately address the proposers' concerns.
Advantages to single-discipline firms and disadvantage to new firms	The SF 330 will only streamline the process for single-discipline firms who go after one or two government projects per year. The form allows no flexibility. It does not encourage building new teams and appears to require firms to use subconsultants they have used on specific projects in the past, regardless of their performance. In addition, it requires 5 projects for individuals with no way for the individuals to show additional experience on specific project types.
Data Entry	First look leads us to believe SF 330 will be somewhere in the nature of an additional 10-15 hours per RFP per firm per solicitation when compared to SF 255 - more for multi-discipline firms. In addition, they are anticipating sending this out as a fillable PDF file. Which means that firms will have to cut and paste rather than use an actual database. In short, the new forms will cost Architectural and Engineering Firms hundreds of thousands of dollars in staff time and preparation of new forms, as well as in changing existing databases to be consistent with the government's requirements for a new form they never even attempted to fill out themselves.
Lack of Adequate Space	Neither form includes adequate space for pertinent information. I understand that the government is trying to

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	simplify the forms, but they are not allowing for room to detail project and personnel information, which many agencies require. The new SF 254 does not allow room to put the names of projects, much less who the work was provided to. I like the format of "Portrait" vs. "Landscape." It makes it easier to include additional materials, if required, in the same format. It would be nice for the government to require everyone to use one program for the forms versus every consultant creating his or her own and having them be different. Especially if they will be asking for the forms electronically.
Remarks on SF 330	The 330 form is an excellent redress of previous weaknesses in the 254/255. It much more carefully and clearly ties the proposed key personnel to the relevant projects of the firm and whether or not they had a role in them. Often it is very difficult to ascertain whether the relevant projects cited by the firm were actually done by the proposed key personnel. It now takes an inordinate amount of analysis to try to learn who did what and when.
Visual State	The graphic design of the form is visually unappealing. It is critical that the form's layout be set up by a graphic designer; preferably one well-versed in how firms will want to use the form. The inability to provide pictures on the project description form is troubling. Having to provide additional sheets with photos could be confusing to the reviewer of the proposal if they are not attached directly to the project form.
General pros and cons	A primary objective for changing the 254/255 and replacing it with the SF 330 should be to increase the efficiency and productivity at A/E firms by reducing excessive paperwork and thus, allowing for improved attention to design. It would be expected that the new form (SF330) should significantly reduce -- not increase -- the time necessary for A/E firms to complete this form. In addition, there should be a clear and simple method to determine accurate pagination. Font size needs to be standardized and easy to read.
Digital Capability	Provide the ability to save, fill out and transmit the form digitally, as well as re-use/maintain the repetitive information more efficiently. Allow digital insertion of multiple pages, such as a Section E for each key person and a Section F for each project, both of which could often be done once and copied for the next submittal. Allow color coding or highlighting text for internal use, with ability to save to file, that is: 1. required separately for each submittal (project specific)

	2. required annually (firm profile) 3. relatively permanent (firm name, address) The intent here is to expedite updating of information.
Form hinders satellite offices	The new form places a greater importance on corporate offices and hinders satellite offices from procuring contracts.
Perform test run before release	The task force recommends that the responsible agencies first perform a trial run on a diverse set of projects to work out any complications that might arise before implementing them industry-wide.

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2000-608-89

"Boutin, Bill" <BBoutin@ensr.com>
01/08/2002 04:05 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: Proposal to Replace the SF 254/255 with SF 330

Ms. Duarte,

Attached please find ENSR Corporation's comments regarding the above mentioned proposal. Should you have any questions

concerning our comments, please contact the undersigned. <<SF 330 Comments Letter.doc>>

Bill Boutin
Director, Government Programs
ENSR Corporation
mailto:bboutin@ensr.com
1-800-966-7550, Extension 219

- SF 330 Comments Letter.doc

ENSR INTERNATIONAL

608-89

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www.ensr.com

January 7, 2002

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
ATTN: Laurie Duarte
Washington, D.C. 20405

RE: New Consolidated Form for Selection of Architect-Engineer Contracts (SF 330)

Dear Ms. Duarte:

ENSR Corporation (ENSR) has reviewed the proposed change to replace the current Standard Forms 254/255 with the Standard Form 330. Based upon the comments concerning this action in the Federal Register, Volume 66, Number 203, dated 19 October 2001, we respectfully offer the following comments:

This proposed change is based upon the premise that the new SF 330 will comply with the Paperwork Reduction Act, will reduce unnecessary information requirements and will substantially reduce the level of effort required for a firm or team of firms to submit this new form. Based upon years of experience in addressing our firm's credentials on proposed government procurement actions, we do not believe that all these outcomes will be realized. In addition, it is our belief that this SF 330 will only create an unbalance in firms entering into the government market place as this SF 330 will likely favor the firms who have done business with a specific agency in the past over new firms attempting to enter the market. Likewise, the requirement that an individual Part II will need to be prepared for each supporting office of a firm and each teaming member office will likely create a major paper exercise when responding to a regional or national solicitation when a firm is required to address each supporting office or teaming member office.

While the position is taken that the consolidation of SF 254/255 into one form (SF330) appears on the surface to have merit, it is doubtful that ultimately we will see a reduction in the level of paperwork based upon what most agencies require to have in the form of information. What is eliminated in one section will likely be a requirement that surfaces elsewhere in the proposal. Furthermore, the belief that certain information is not important in the selection process would suggest that the sampling process was flawed. The assumption that the current SF 254/255 only takes 29 hours to produce must be an error. Our firm's experience as well as those that likewise submit proposals has yet to identify one firm which has the ability to accomplish this feat in the timeframe specified. The word processing alone for tailoring resumes, projects, and general text, using notes provided by technical personnel, to support a proposal, will take more than the 29 hours you estimate for the entire proposal process. You have not considered the

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time spent coordinating information on teaming partners, resorting financial information to meet the requirements for "averaging" and generally writing the response in the first place to meet the intricate requirements of the SF 330.

In addition, this new form is expected to create an unbalance in the selection process for firms who submit on procurement actions for the first time. One aspect of this proposal would suggest that firms with current Federal client experience can easily allude to the credentials of their staff and their project experience, while less known firms trying to enter the Federal marketplace will be at a disadvantage in limiting what they can present. The alternative would then be to expand the information contained in Part II Section H, which in turn would create an unbalanced proposal from the reviewer's viewpoint for firms attempting to present their credentials in more depth.

As a final general comment, there has been a tremendous cost investment that our industry has made over time in using the SF 254/255 format. Costs have been incurred in training staff on the government's proposal process and requirements, developing computer programs for internal systems to generate proposals in required formats, and development of databases to maintain information. We are talking here in terms of significant dollars that may now have been wasted on a system that appears to have met both government and private sector needs but for some reason now requires revamping. The cost for reinventing the wheel is also likely to be of a major magnitude if our industry has to spend a significant amount of time and money trying to figure out how each government agency will implement this new process and what their agency specific requirements may be.

In addition to the above, ENSR respectfully requests clarification on the following aspects of this proposed change:

- How much time will there be from finalization of the form design to implementation so that we can recreate the forms electronically? This step must be done to enable us to fill them out on the computer screen and through merges with our database as much as we are able.

- Will there be any type of software sold by the government on which Agencies will want the documents produced? Is there any commercial software on which Agencies will want the documents produced?

- Will agencies want electronic documents as well as hard copy documents for proposals? Will electronic documents be preferred?

- What is the definition of "involvement of a branch office" in the proposal? If a proposal uses only one or two people from an office, does that office have to be considered a participant in the proposal? This could make it necessary to develop Part IIs for offices that normally don't propose to Federal agencies. Their Part IIs could look very silly in the proposal or being sent to the agencies.

- The requirement to include a separate Part II for each branch office may increase the size of some submittals considerably. Multiple offices within our firm routinely work together on a

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single project. This alone may make it impossible for us to meet the limitations that the Government expects to place on page counts. Will provisions be made for page limitations to apply solely to Part I?

- The layouts are smaller than reality in the online material, but still may not be large enough. We should be able to use at least 10-point type in our submissions, so that it can be read without a microscope. 11-point would be preferable.
- Can space enlarge vertically to include necessary information, for other than Section H - Additional Information and the added page for the organization chart? That is, can a Resume or Example Project be longer than one page? Which block text areas specifically can be enlarged? What about project descriptions?
- What is the definition of "unique or unusual experience"? (See 2.b.)
- The Organizational Chart required in Section D of Part 1 of the SF 330 will probably require a landscape orientation rather then the new portrait orientation of the form. In addition, landscaped work management flow charts and additional matrices will undoubtedly be required in Section H of Part I, "Additional Information." Will this change of orientation be permitted?
- While photographs can only be used if requested by the Agency asking for proposals, when they are requested, should photographs only be on separate pages from text in E. Resumes of Key Personnel or F. Example Projects, since current computer technology allows them to be integrated with text.
- In any of the 5 projects listed with each Resume, was the omission of the name of the client intentional? Can confidential clients be used with resumes?
- In any of the 10 Example Projects, can a confidential client be used?
- In Part I, Section E. Block 23a(2) TO 23E(2) AND IN Part I, Section F. Block 25 a single city and state is requested. Frequently our "project location" includes multiple cities and even multiple states (for example, district-wide services to Corps of Engineers and pipeline projects crossing several states). Will the review process be capable of handling more than a single city and state in this item?
- In any of the 10 Example Projects, should the contact named be the company's Project Manager with whom the firm has dealt, or should it be someone higher up in the company?
- In any of the matrices, such as F. Example Projects, 31, Firms from Section C or G. Key Personnel Participation in Example Projects, can unused rows be deleted or new rows added?
- There is no instruction as to how often Part II submissions to agencies have to be updated.

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Can we assume once a year, as with the SF 254? Also, must new Part II documents be created each time a new proposal is created or can a standard version be used for a year?

- In SF 330 Part II, 6a, etc., should the firm's point of contact be the same for all offices, or should each branch office have its own point of contact?

- In SF 330 Part II, 9b, can any number of disciplines be used, including more than the number for which space is provided on the form? Our firm employs more than 20 disciplines of those listed, plus several, which are not in the proposed list.

- In the same section as noted above, why are both a function code and discipline description needed? Or is something else desired for the center space in the table. If so, please specify. Nevertheless, the space is too small for an information entry.

- In Part II for Block 10. Revenues are requested to be reported by Project Type averaged over the past 5 years. How are we to handle years when an office either did not exist or did not offer the specific service during that timeframe?

- In SF 330 Part II, 10b, a miniscule amount of space is available which seems to respond to the following in the Specific Instructions, Part II-General Qualifications, 10: "A particular project may be identified with one experience category or it may be broken into components as best reflects the capabilities and types of work performed by the firm. However do not double count the revenues received on a particular project." We assume this means that for each Profile Code, a specific project must be identified and described to provide evidence that our company had performed the type of work indicated. Unless one-point (unreadable) type was used in this space, no effective information can be included. What is the actual intent of the form? Shouldn't it be returned to the format of the SF254 profile code examples, which it is trying to duplicate?

- Is it the intention of the SF 330 to eliminate potential teaming opportunities among firms, specifically large businesses with small businesses? Based upon the focus of the SF 330, it would appear that past working relationship is critical to the selection process. If past relationships are a major factor, firms will not look to new emerging businesses because it will be a discriminator in the selection process.

- Is it the intention that the SF 330 form be prepared with the view of it being a two-sided form? This is not clear in the proposed action.

- The rationale for reporting revenues of individual offices is not clear? Could further clarification on this issue be provided?

- In Part II for Block 10, how are revenues to be allocated among offices when multiple locations within the firm perform portions of a single project? Our accounting practices do not allocate project revenues by office within these categories. (The same is true for many companies in this same situation.) Retroactive assignment of revenue among thousands of

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projects and more than 65 office locations over the past five years within the new set of experience profile codes will be a significant and costly effort.

- The requirement to report revenues by individual offices will unfairly penalize commercial enterprises that close offices due to market conditions. For example, using the currently proposed format for the SF 330, a firm would be unable to include revenues earned by a project-specific office that managed a three-year $300,000,000 project nearly identical to the requested work if that project office closed at the end of the project and dispersed its staff among other offices within the firm.

As a final comment, it should be noted that the SF 330 seems to be focused on the individual office and the requirements for an inordinate amount of information pertaining to each office. Most firms competing in the government marketplace have devised systems to meet the current requirements. Someone will need to factor the cost that will evolve in our industry to develop new systems to meet the refocus that will occur in this proposed action.

While ENSR can appreciate the compelling reasons given for these changes, we do not see the realistic need for this change. If the Paperwork Reduction Act is the driving factor for this change, the mandate of electronic submissions would satisfy this requirement, while simultaneously leaving a system in place that has met the needs of both government and private industry for over 25 years. Change for the sake of change should not be a viable option, unless the system is broken. That has not been demonstrated in the proposed change.

Sincerely,

Wilbur H. Boutin Jr.
Director, Government Programs
ENSR Corporation

2000-608-90

"Camille Fleenor"
<cfleenor@acec.org>
01/08/2002 02:29 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: Comments

<<FAR1-acec.doc>>

Camille Fleenor
Director, Federal Procurement Policy
American Council of Engineering Companies
1015 15th Street, NW
Washington, DC 2005
(202) 682-4343

- FAR1-acec.doc

608-90

FAR Desk Officer
OMB
Room 10102
New Executive Office Building
Washington, DC 20503

Re: FAR Case 2000-608, New Consolidated Form for Selection of Architect-Engineer Contractors

Dear Sir/Madam:

Thank you for the opportunity to comment on the new consolidated form for the selection of architect-engineer contractors. The American Council of Engineering Companies (ACEC) represents over 5,600 engineering companies throughout the United States. ACEC member firms range from small firms to large multi-disciplined companies that operate globally. Regardless of size, most of our members firms are actively engaged in work for Federal clients.

General Comments:

ACEC has received numerous comments from member firms regarding the proposed SF330 form. Many have stated that the new form does not streamline the process but instead requires that contractors provide even more information when responding to RFP's. The consensus among member firms is that the implementation of the proposed SF330 would pose a significant burden on the a/e community. ACEC requests that the proposed changes to SF 254/255 be reconsidered.

If it is decided to move forward with the proposed SF 330 form, ACEC is concerned about the implementation process. The Federal Register announcement regarding proposed SF330 only mentions three Federal agencies that will be impacted by the proposed rule -- DoD, NASA, and GSA. ACEC strongly suggests that should a decision be made to implement the SF 330, all Federal agencies would be required to adopt the form at the same time allowing for a transition period.

In the background information published on page 53314 of the Federal Register, it was stated that the proposed rule will create six significant changes. These changes and ACEC's comments are listed below.

A. Merges the SFs 254 and 255 into a single streamlined SF 330. ACEC believes that the proposed SF330 will increase the cost of responding to CBD announcements. The proposed form requires more information than the current SF 254/255 forms, particularly if the emphasis on branch offices is not eliminated (see comments on Part I, Section C) and will require more pages in a proposal due to new formatting requirements. Member firms see no streamlining benefit as the proposed SF220 form closely mirrors information currently in the SF 254/255 forms. Many responded that it will be a burden on a/e firms to spend the amount of time required to develop new formats for the same information.

B. Expands essential information about qualifications and experience such as an organizational chart of all participating firms and key personnel. The requirement for an

2000-608-90

"organizational flowchart" showing each firm (and each branch office) is confusing. To list all of the branch offices on a chart gets unwieldy, and we do not understand its value to the government. ACEC recommends the government continue to simply require an organizational chart, without requiring the listing of all participating firms and branch offices on the chart.

C. Reflects current architect-engineer disciplines, experience type and technology. The revised experience code numbering affects the databases that many member firms have built over the years. Though this is expected to be a one-time cost, it will present an economic hardship to many smaller firms.

D. Eliminates information of marginal value such as a list of all offices in a firm. The proposed SF330 form now requires a separate form for each branch office. This is arguably even more burdensome than a listing of offices. ACEC strongly recommends the elimination of this requirement and have firms submit only one Part II for the entire firm or a limited number of Part II forms for major business activities.

E. Permits limited submission length thereby reducing costs for both the architect-engineer industry and the government. No comment.

F. Facilitates electronic usage by organizing the form into data blocks. The new form will be difficult to manipulate due to space limitations

Detailed Comments:
Page 53323 - 53327: Part 1

A. Section C. Proposed Team

ACEC member firms raised concerns about this section's requirement of a listing of each branch office. Many firms, particularly large engineering companies, have multiple offices that often function as work centers, not profit centers. Branch offices are often a place where people work though accountability rests with a business unit that may not necessarily be located at that office. Therefore, we do not believe the listing of branch offices in Section C as "Team Members" makes sense. If a listing of branch offices is required, then we recommend that the requirement to list branch offices in Section C be limited by "branch offices with significant roles on the team." We see no advantage to the government to have a listing of numerous branch offices that have limited involvement in the project.

Furthermore, ACEC recommends that the role of each firm that will be involved in performance of this contract needs also be specified/defined (i.e., prime, sub, specialty and whether the firm is a small business, women owned business, Hub-Zone Business, or Vet-Owned Business).

B. Section D. Organization Chart of Firms and Key Personnel

Many firms did not understand the requirement for an "organizational flowchart" showing each firm (and each branch office) listed in Section C. To list all of the branch offices on a chart gets unwieldy. It is recommended that the government continue to simply require an organizational chart, which can be prepared by the firm commensurate with the scope of work and requirements of the government in the announcement, and if required by the contracting agency, that the firm affiliation and office location for each person be identified on the chart. Or alternatively, the government should consider allowing firms to highlight the branch office that will be most involved with the contract.

C. Section E. Resumes of Key Personnel Proposed for This Contract

608-90

For senior personnel, there's inadequate space, unless information desired is project specific.

D. Section F. Example Projects Which Best Illustrate Qualifications
Item 26 and 27: Per existing 255, consultants to prime often do not have this information.

Item 28: The directions for provision of photographs is not consistent with the form question. There is the implication that points will be taken off if a photo is furnished and not requested.

Item 31: Adding team member firms that have worked on each project is not an onerous requirement, but some firms believe that it will force prime contractors to naturally select sub-contractors with whom they have worked in the past. This section may make primes more tempted to contract with firms with whom they have worked before, in lieu of teaming with a specialist, perfectly suited for that contract, but with no prior experience with the prime. They may even keep contracting with a mediocre firm simply because they may fear teaming with a new sub-consultant.

E. Section G. Key Personnel Participation in Example Projects
This does not reflect firms having worked together; possible a very experienced new hire is proposed, but who has never worked with prime firm. Firms may also have worked together successfully on many projects, but not on project examples. This section discriminates against new alliances, particularly large firms with small business.

Page 53329: Part II

a. The regulation is unclear as to the meaning of the term "revenue." Currently, the SF254 requires "fees" rather than revenues, which are viewed as the funds committed by the Federal government when awarding a contract. We recommend that the Part II continue with the use of fees, not revenues.

b. The regulation does not indicate the frequency of updating Part II. Contractors currently update the SF254 annually, and therefore we assume this will not change with the Part II. If this is not the intent, more frequent updates will put a greater burden on contractors.

c. We are unclear as to how Part II will be linked to the firm's ACASS number. This needs to be clarified.

d. Item 7 should refer to block 2a; there is no "3a".

e. Item 8a –8c. Six years is restrictive for firms in business more than six years with several name changes.

f. Item 9. The number of projects is more important than revenue, particularly for small businesses

Again, thank you for the opportunity to comment on the proposed SF330.

Sincerely,

Camille Fleenor
Director, Federal Procurement Policy

2000-608-91

"Jodi Heiser" <jheiser@gsinetwork.com>

01/08/2002 11:59 AM

To: farcase.2000-608@gsa.gov
cc:
Subject: SF 330 Comments

- CommentLetter.doc

608-91

January 8, 2002

RE: New SF 330

General Services Administration
FAR Secretariat (MV))
Attn: Laurie Duarte
1800 F Street, NW, Room 4035
Washington, DC 20405

Dear Ms. Duarte:

Geotechnical Services, Inc. (GSI) respectfully submits the following questions and comments for your review:

- Do pages 1 -7 of SF 330 need to be submitted with the entire form?

- It seems strange that pages numbers are at the bottom and you ask for page number and total pages at the top. I understand that the page numbers at the bottom represent the "form" page numbers and the page numbers at the top represent the number of "total pages submitted" with that particular SF 330. However, this may create some confusion unless we are given instructions on how to handle page numbers. For instance, how should attached sheets be numbered (for org charts, photos, etc.)? With the current system, some page numbers will be the same for consecutive pages.

- Do you want the organizational chart (section d) after page 8 or do you want it attached as an appendix? If all submittals will require an organization chart, why not make it a separate page?

- It seems there is not enough ample space in Section 22 (Professional Qualifications) to completely answer the question. The space is restricted due to the size of box 21. Typically, information on training and publications can be extensive.

- We were a little confused on the use of photos. In Section 23 you have a box to check if photos are attached. What format do you want them labeled and organized?

608-91

- Section 33 says: "Enter the Specific Data Requested by the Agency." Oftentimes this can be a significant amount of information requested; however the space for Section 33 is small. Our suggestion is to make Section 28 a very brief three or four sentence description and add another section directly below Section 28 requesting additional specific information. This would allow for a more customized response.

- The entire Section G is a great addition. Many firms, including GSI, have been doing this previously.

Lastly, our most important comment:

- Section H seems to be replacing Section 10 of SF 255. However, it now states: "Provide any additional information requested by the agency." It does not allow for a summary of a firm's overall qualifications for the proposal, which the previous form allowed. The previous forms, SF 255, stated, "use this space to provide any additional information or description of resources (including any computer design capabilities) supporting your firm's qualifications for the proposed project." This is the space where firms could differentiate themselves from their competition and where they could provide a final summary. Without a space to do the final summary, there's not a place to specifically highlight key benefits of a team. It appears that the ability to summarize and differentiate our firm has been eliminated.

Thank you for the opportunity to submit our questions and comments. If you have any questions, please contact me at (402) 339-6104.

Sincerely,

Linda Absy
Marketing Director

2000-608-92

"Kara Fraser, CPSM, CPCM" <kfraser@prismonline.com>

01/07/2002 07:46 PM
Please respond to kfraser

To: farcase.2000-608@gsa.gov
cc:
Subject: SF 330 Comments

To Whom It May Concern:

I am a marketing consultant in San Diego, CAwho helps firms to prepare the current SF 254/255 to pursue government work. In the past 10 years I have prepared hundreds of these forms. In addition, I was part of the City of San Diegoconsultant review committee and have reviewed hundreds of SF 254/255 to select firms for projects.

My comments on the proposed SF 330 form are as follows:

GENERAL COMMENTS

· I really appreciate that the form is portrait. I believe it will be easier for firms to complete and clients to review. Great job!

· Table formats f

PART I

Section C

· In the far left columns consider changing the column descriptions to "Prime", "JV" and "Sub". This will be easier for firms to format and will avoid the users confusing "subcontractor" and "subconsultants". You can provide detailed descriptions of these column labels in the instructions.

Section D

· The instructions to create the organizational chart are confusing. A person might assume you are requesting more than one organizational chart.

· It might be simpler if you request an organizational chart depicting the proposed personnel for the project. If the proposed personnel represent more than one firm, indicate the firm with which each person is associated.

608-92

Section E

· For Part 22, I believe that firms will expand the description of other professional qualifications to more than the four or five lines allotted. It probably makes sense for consistency in formatting among firms to go ahead and begin Part 22 under Part 21 rather than next to it.

· Also for Part 22, consider adding the word "relevant" so it reads "Other Relevant Professional Qualifications". Or maybe "Other Professional Qualifications Relevant to Proposed Project Role"

· For Part 23, consider adding the client name after the title.

· Also for Part 23, consider describing the information required for the relevant projects rather than forcing the user to put the information into a table. Since many firms already have this information on file, it will be more cumbersome for the user to individually complete this table. Completing table forms for users is a little more difficult than following directions and "freeform" formatting.

· I assume that it is okay to have the resumes (part 23) go to more than one per page per person. Is this correct? Please clarify in the instructions.

Section F

· Firms definitely want to be able to add photos to this form. Consider encouraging only those photos that depict the service that was rendered or describe some benefit provided to the client.

<u>PART II</u>

This portion is straightforward and should be easy for firms to complete accurately. Good job making it only one page!

Those are my comments for now. I look forward to reviewing the summary of comments. Please don't hesitate to contact me if you have any questions or would like any additional information. I'd be happy to help any way I can.

Kara Fraser, CPSM, CPCM

PRISM Group

www.WinMoreWork.com
p: 858.551.6059, cell: 619.572.7303
toll free fax: 877.431.1623

kfraser@prismonline.com

2000-608-93

Baker

Engineering & Energy

Michael Baker Jr., Inc.
A Unit of Michael Baker Corporation

3601 Eisenhower Avenue
Alexandria, VA 22304-6425
(703) 960-8800
FAX (703) 960-9125

Memorandum

DATE: **Monday, January 07, 2002**

MEMORANDUM FOR: **FAR Secretariat**

FROM: **Tracy Cain, Michael Baker Jr. Inc.**

SUBJECT: **FAR Case 2000-608**
Request for comments on proposed rule and new SF 330

Thank you for soliciting comments on this matter. I found out only today that the deadline was extended and I hope you will still consider my comments. Thank you for your consideration!!

Section	Comment/Suggestion	Explanation
Part I, C, 12-14	After "The named subcontractors and outside associates must be used" ADD "if the firm is awarded work for which the particular subcontractors and/or outside associates are proposed"	For example, if Company ABC proposes firm C specifically for environmental work on a program management contract, and ABC is awarded one of two contracts but they don't include any environmental components, ABC shouldn't have to give XYZ work for which they were not proposed.
Part I, E&F	Allow multiple pages per resume or project description, at least in some cases	Unless we can expand the forms over more than one page, people will be using unreadable tiny fonts.
Part II, 3	Delete "under the current name"	Company XYZ may be acquired by a new parent company but if it is still the same group with the same experience, why change the year established?
List of Disciplines	Add categories: • Technical writers/editors (or clarify if they would fit under "Technician/Analyst") • Graphic artists • Water Resources Engineers • Public relations / Public involvement	Accurately reflect firms' employee breakdown. Public involvement is playing a greater part in A/E contracts, and A/E RFPs are asking for more varied backgrounds. Find a better way to appropriately categorize these employees/firms ("Administrative" just isn't accurate enough depiction.)
List of Experience Categories	Group by category of work instead of alphabetically. For example, combine buildings in one group with subgroups including "field houses", "barracks, dormitories", and "office buildings", among others. Facilities could be another group including "storm water handling & facilities", "research facilities", etc.	It is difficult to find related codes when "Flood plain mapping" is found under "surveying", or "flood control" under "rivers". Another example: "hydrographic surveying" and "hydraulics" are listed in the Hs, but "hydrology" is listed with "Water Resources" and "Ground water".
Add to Experience Categories	Add categories, for example: • Intelligent Transportation Systems (this could be grouped with traffic & transportation engineering) • Internet / Web / IT Systems Development • Public involvement & outreach; training	Reflect increasing role of computer technology in A/E Firms and projects. Many clients require development of special computer applications and websites as part of their projects, and many firms have this experience in house that is not just "computer service" or help-desk types.
Part II, 9 & 10	Allow multiple pages or large firms with many disciplines will have to use unreadable, tiny fonts	Not enough space for firms with more than 20 disciplines. The largest firms who submit most often will have the hardest time making this piece fit.

2000-608-94A

"Searing, John M"
<searing@bnl.gov>
01/07/2002 05:12 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc: "Schaeffer, Michael" <mschaeffer@bnl.gov>
Subject: FAR Case 2000-608

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW, Room 4035, ATTN: Laurie Duarte
Washington, DC 20405

Ms. Duarte:

The following comments are on behalf of Brookhaven National Laboratory with respect to FAR Case 2000-608.

1. The process does not appear to have been streamlined. With respect to the SF 330, there is just as much information to fill out as before (on the 254 and 255), possibly more.
2. Instead of two forms as in the past, it is now two parts (1 & 11) in one form. It is unclear what the difference is?
3. Part 11 - General Qualifications, should come first, it is now last. Part 1, Contract Specific Qualifications, should come second. Our experience has always been when reviewing qualifications we would always want to see summary information first before we dig into specifics. You may disqualify somebody by just reviewing the summary information.
4. The order of the form should be revised to be more logical and useful to the reviewer. Pages 1-7 are the instruction pages. Why would you want to submit them as part of your qualifications. From the reviewer standpoint there is no need to get a copy of the instructions with each submittal.
5. With respect to the Paperwork Reduction Act, the form should be order differently to reduce waste and submittal size. The General Qualifications should become Part 1, and Contract Specific Qualifications should become Part 11. If you have to add the instructions, they should come at the end. In that way they can be removed by the A/E firm before submittal.

Thank you for the opportunity to comment on this subject.

John M. Searing, P.E.
Manager - SBMS Office
Brookhaven National Laboratory
Bldg. 197B
PO Box 5000
Upton, New York 11973

Phone - (631)344-3108
Fax - (631)344-8395
Email - searing@bnl.gov

BNL Homepage - <http://www.bnl.gov > - Brookhaven - A place where world-class research flourishes!
SBMS Homepage - <https://sbms.bnl.gov >
SBMS Office Homepage - <https://www.bnl.gov/sbms_office/ >

SB 60.02

DESIGN PROFESSIONALS COALITION

1250 H Street, N.W., Suite 575, Washington, D.C. 20005
Tel: 202/393-2426 Fax: 202/783-8410

January 8, 2002

2000-608-94B

General Services Administration
FAR Secretariat (MVP)
1800 F Street, N.W., Room 4035
Washington, D.C. 20405

Dear Sirs:

Reference FAR Case 2000-608, New Consolidated Form for Selection of Architect-Engineer Contractors on behalf of the Design Professionals Coalition (DPC).

DPC is a national organization created in 1983. Its membership includes the nation's leading engineering, architectural, surveying and mapping firms. Member companies are multi-disciplined, multi-practice and multi-office firms with both domestic and international practices. They provide services in military construction, infrastructure, transportation, hazardous and nuclear waste, water and wastewater, and environmental matters, and employ alternative project deliver as well as design-bid-build approaches.

We have reviewed the subject regulation and provide the following comments on the changes made by the proposed rule. While other organizations have provided more detailed information, DPC's comments are focused on the proposed regulation's stated purpose of reducing the paperwork burden:

1. Merges the SFs 254 and 255 into a single streamlined SF 330. DPC is concerned that the new form is not streamlined. The proposed SF330 requires more information than the previous two forms, will require more pages in a proposal to respond to government CBD announcements due to new formatting requirements, and will require a substantially increased number of Part II submissions if the requirement for having a Part II on each branch office is adopted. The new SF330 will increase the cost to the architect-engineer industry of submitting proposals. Much of the cost will be incurred by the emphasis on "branch offices," which is not found in the SF254/SF255.

2. Expands essential information about qualifications and experience such as an organizational chart of all participating firms and key personnel. We do not understand the requirement for an "Organizational Flowchart" showing each firm (and each branch office) listed in Section C. To list all of the branch offices on a chart gets unwieldy, and we do not understand its value to the government. DPC recommends the government continue to simply require an organizational chart, without requiring the listing of all participating firms and branch offices on the chart. This information is available elsewhere in the proposal.

3. Reflects current architect-engineer disciplines, experience type and technology. The changes in the experience codes will require some one-time costs in industry databases to reflect the new codes with little added benefit to the government.

2000-608-94B

4. Eliminates information of marginal value such as a list of all offices in a firm. DPC does not believe that the new forms have eliminated this information since the SF330 instructions now require a separate form for each branch office rather than a listing of offices. We recommend the elimination of this requirement and have firms submit only one Part II for the entire firm or a limited number of Part II forms for major business activities.

5. Permits limited submission length thereby reducing costs for both the architect-engineer industry and the government. Our assessment of the new requirements of the SF330 is that it will substantially increase the submission length of proposals and increase the costs to A-E firms. While many firms in the past have used one page resumes for key management personnel and one-half page resumes for technical resource personnel, the new format will require at least a two-page resume in all cases.

6. Facilitates electronic usage by organizing the form into data blocks. We do not understand how the more formal structure of the SF330 facilitates its electronic submittal. We have had no problem putting previous SF254/SF255 submittals into an electronic format, either on a CD or transmitting the Word or PDF files electronically. The new block format simply reduces the flexibility of the form for industry use and in some cases results in wasted space due to format restrictions.

DPC appreciates the opportunity to comment on the proposed SF330. We believe that some of the changes to the SF254/SF255 need to be rethought in the interest of reducing the burden on both the A-E industry and government. In general, we believe that the SF330 increases rather than reduces the burden, and in some cases, establishes new requirements with little benefit to the qualification-based selection process.

Sincerely yours,

Thomas J. O'Neill

Thomas O'Neill
Chairman
Design Professionals Coalition

** TOTAL PAGE.02 **

GSA

JAN 17 2002

GSA Office of Governmentwide Policy

MEMORANDUM FOR BARRY S. WILSON
DIRECTOR
DEFENSE ACQUISITION REGULATIONS COUNCIL

FROM: RODNEY P. LANTIER
DIRECTOR
REGULATORY SECRETARIAT

Rodney P. Lantier

SUBJECT: New Consolidated Form for Selection of Architect-Engineer Contractors

Attached are additional comments received on the subject FAR case published at 66 FR 53314; October 19, 2001.

Response Number	Date Received	Comment Date	Commenter
2000-608-95	01/14/02	12/13/01	RSA Engineering, Inc.
2000-608-96	01/14/02	12/14/01	MAPPS
2000-608-97	01/10/02	01/10/02	Catherine Colan
2000-608-98	01/10/02	01/10/02	Lisa Roberson
2000-608-99	01/10/02	01/10/02	Rhodes White
2000-608-100	01/14/02	12/13/01	Parsons Brinckerhoff
2000-608-101	01/14/02	12/14/01	Scott Fischer

Attachments

U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405-0002
www.gsa.gov

2000-608-95

RSA Engineering, Inc.

MECHANICAL AND ELECTRICAL CONSULTING ENGINEERS

December 13, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
Washington, DC 20405

ATTENTION: Laurie Duarte

Gentlemen:

REFERENCE: **FAR Case 2000-608**
Review Comments on New Standard Form 330

RSA Engineering, Inc. is a small mechanical/electrical consulting firm based in Anchorage, Alaska. We have pursued cold climate design work with private, as well as governmental agencies. We currently have 2 prime contracts with the U.S. Navy to provide work in Antarctica and the South Pole. We are also subconsultants on several open term contracts for federal agencies, including GSA, FAA, and NPS.

We understand that the goals for this form are to increase efficiencies and decrease administration. We feel that these goals are admirable, but we do not think that the form will meet those goals.

After reviewing the form, we feel that it will actually do the following:

- Limit competition by stressing "team experience", especially in an area such as Alaska that has a limited pool of consultants. If we haven't worked with an architect on a similar job, the chances are very slim that we ever will.
- Increase administration costs astronomically for consultants (29 hrs. vs. 4 hrs.; in additional to inputting an entirely new database). We have only 4 administrative staff members. We have worked diligently to streamline our office in order to keep our overhead to a minimum.
- Eliminate some consultants who will not be able to devote the time required to this new form. If we are to pursue federal projects or contracts in the future, we would have to add another staff position just to complete this form and to create and maintain a new database.
- Cause the cost of projects to increase to the end user since consultants will have to recover the additional administrative costs through project fees. Our overhead will go up and the cost to provide services to the users will in turn also go up.

We want to thank you for the opportunity to present our comments on this new form. We urge you to reconsider the use of this form. It will be detrimental to federal agencies and to all their consultants.

Sincerely,

David A. Oliver, P.E.
President

dao/mma
01-1193/1.00

2522 Arctic Blvd., Suite 200 — Anchorage, AK 99503-2516 — Phone (907) 276-0521 — Fax 276-1751

2000-608-96

Management Association for Private Photogrammetric Surveyors

December 14, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW
Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

<u>RE: FAR Case 2000-608</u>

Dear Ms. Duarte:

The Management Association for Private Photogrammetric Surveyors (MAPPS) is a national association of more than 155 private sector firms, employing more than 6,000 individuals, engaged in professional surveying and mapping services, many of which are contractors to the U.S. Government.

We appreciate this opportunity to comment on the proposed SF 330, for Architect-Engineer Qualifications.

MAPPS commend the task force that developed the SF330. We know a considerable amount of time and effort went into this proposal, and we deeply appreciate the dedication of those involved. We generally find the form to be an improvement over the current 254-255 and believe it will not only save time for competing firms, but provide much more useful information to Federal contracting agencies.

The one shortcoming we found in the proposed SF 330 is its treatment of the surveying and mapping profession. The "Brooks Act" and the FAR were amended in the late 1980's, by revising the definition of architectural and engineering services to specifically include "surveying and mapping". As a result, the 254/255 is currently used, and the SF 330 will be used, for procurement of surveying and mapping services.

We do not believe the proposed SF330 adequately reflects state-of-the-art practice and the full range of services provided by surveying and mapping firms, nor the range of services required by and procured by Federal agencies. The current proposal has a List of Disciplines (Function Codes) and a List of Experience Categories (Profile Codes), that are not as well organized as possible, and fail to provide competing firms, or evaluation teams in agencies, an ability to fully consider the personnel and experience of firms. As a result, we recommend the attached revisions to the proposed forms.

John M. Palatiello, Executive Director
1760 Reston Parkway, Suite 515, Reston, Virginia 20190
P (703) 787-6996 F (703) 787-7550 E info@mapps.org www.mapps.org

608-96

These proposed revisions have been developed jointly by MAPPS, ASPRS and the American Congress on Surveying and Mapping (ACSM). It is our understanding that ASPRS and ACSM will be filing separate, but similar comments. The attached proposal reflects the combined and unified recommendation of the surveying and mapping community, including those individuals in private practice, as well as those in government services, including the Federal surveying and mapping workforce.

Again, we commend the team that worked on development of the proposed SF 330, we appreciate this opportunity to comment and we urge the adoption of the SF 330 with these recommended improvements.

Sincerely,

John M. Palatiello
Executive Director

608-96

Recommended SF 330 Changes RE: Surveying and Mapping

Revise the List of Disciplines (Function Codes) by striking:

Cartographers
Geodetic Surveyors
Geospacial (sic) Information Systems Specialists
Topographic Surveyors

And re-organizing them in a new list with a general category and sub category, just as the form proposes for Engineers. Our proposal is to list surveying and mapping disciplines as follows:

Surveyor and Mapping Scientists:
_ _ Aerial Photographer
_ _ Cartographer
_ _ Geodetic Surveyor
_ _ Geographic Information Systems Specialist
_ _ Hydrographer
_ _ Image Analyst/Photo Interpreter/Photo Lab Specialist
_ _ Land Surveyor
_ _ Photogrammetrist
_ _ Remote Sensing Scientist

We would also suggest adding a general category for "Engineering/Design Software Developer"

Revise the List of Experience Categories (Profile Codes), by striking:

Aerial Photogrammetry
Construction Surveying
GIS Development/Analysis
Hydrographic Surveying
Land Boundary Surveying
Surveying: Platting, Mapping; Flood Plain Studies
Topographic Mapping

And re-organizing them in a new list with a general category and sub category. Our proposal is to list surveying and mapping disciplines as follows:

Surveying and Mapping

_ _ _ Aerial Photography & Airborne Data and Imagery Collection and Analysis
_ _ _ Cartography
_ _ _ Charting (Including Nautical and Aeronautical)
_ _ _ Close Range or Terrestrial Photogrammetry
_ _ _ Construction Surveying
_ _ _ Digital Orthophotography
_ _ _ Digital Elevation & Terrain Model Development

608-96

_ _ _ Environmental & Natural Resource Mapping (habitat, natural and man-made phenomena)

_ _ _ GIS Services: Development/Analysis/Data Collection

_ _ _ Geodetic Surveying (Ground and Airborne GPS)

_ _ _ Geospatial Data Conversion (including scanning, digitizing, compilation, attributing, scribing and drafting)

_ _ _ Hydrographic Surveying

_ _ _ Land Surveying

_ _ _ Location/Addressing Systems

_ _ _ Photogrammetry

_ _ _ Remote Sensing

_ _ _ Topographic Surveying and Mapping

Flood Plain Studies should be a separate, independent category and a new separate, independent category should be established for Environmental Planning.

2000-608-97

"Catherine Colan Muth" <cmuth@orcolan.com>

01/10/2002 01:45 PM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: Comment to Proposed Rule

Comment to Proposed Rule FAR case 2000-608:

I represent O. R. Colan Associates, Inc. Our firm recently rewrote the Acquisition and Relocation Guidebooks for the GSA.

Our company is often required to provide the Federal Form 254 and 255 which this will replace.

There is no Discipline (Function Code) or Profile Code that accomodates our services. I recommend that the following codes be considered for addtion to the existing list of codes:

Function Code: Right of Way Acquisition/Relocation

Profile Code: Right of Way Acquisition/Relocation

Thank you.

Catherine Colan Muth, President, O. R. Colan Associates, Inc.

2000-608-98

"Lisa Roberson"
<lbroberson@newcomb-boyd.com>
01/10/2002 10:38 AM

To: farcase.2000-608@gsa.gov
cc:
Subject: FAR Case 2000-608

> It has come to my attention that in consolidating the SF Forms 254 and
> 255 into the SF 330 at some point in the future, it is intended that
> the profile codes will change. This will wreak havoc within
> architectural and engineering firms across the country. Most
> accounting systems in A/E/C firms are set up with the current profile
> codes so that they can merge and share this information with marketing
> departments for purposes of assembling government proposals and
> reporting project activity to government agencies. Please reconsider
> changing of profile codes!!
>
> Lisa Roberson
> Marketing Manager
> Newcomb & Boyd
> lbroberson@newcomb-boyd.com
> 404-730-8511 T
> 404-730-8401 F
> www.newcomb-boyd.com
>
>

2000-608-99

"White, Rhodes" <rwhite@klgconsolidated.com>

01/10/2002 10:32 AM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: FAR Case 2000-608

I have several comments on this form.

They are: What do you do with a new hire in your firm who has not worked on the "Company projects"? They will not get al or 2 in the form on field 36. This person could have valuable experience, relevant to your project.

Why are the project profile codes changing, this will Totally mess up whatis in the accounting system (of most firms) that merges with our marketing software system?

I am still reading but these are my first objections.

Rhodes B. White

Director of Corporate Marketing

KLG
980A Marietta Street, NW
Atlanta, GA30318
Tel: 404-897-9936
Fax: 404-881-6227
Email: rwhite@klgconsolidated.com

http://www.klgconsolidated.com

2000-608-100

Parsons Brinckerhoff
One Penn Plaza
New York, NY 10119-0061
212-465-5000
Fax: 212-465-5096

December 13, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW
Room 4035
Washington, DC 20405

Attention: Laurie Duarte

Parsons Brinckerhoff would like to offer a few comments/suggestions in regards to FAR case 2000-608, the creation of the new SF 330 form to replace the existing SF 255/SF 254 forms.

Annual Reporting Burden

In response to your solicitation for requests for comments regarding the estimates on the public burden to collect information for the proposed SF 330, we put forth the following. We have some concerns that the proposed estimate of 29 hours to complete the SF 330 (increased from the current 2.2 hour estimates for SF 255/SF 254) is still low and does not take into consideration the time it takes to compile the prerequisite information on employees and projects. The existing SF 255/SF 254 forms require large A/E firms with over 1,000 employees and over 1,000 active contracts to make an initial time investment of about 160 hours each year to compile employees by discipline and location and to code active projects by current SF 254 codes. The proposed SF 330 form will not eliminate this prerequisite. In fact, the proposed SF 330 form will add roughly 30 new profile codes to the form. This will increase the burden as companies will need to re-evaluate and possibly re-assign experience categories to their current and historical projects.

In addition, it is anticipated that the new SF 330 Part 1 and Part II will take an estimated 30 to 40 hours to complete for each submittal compared with the 29 hours proposed.

SF330 Form

As requested, the following represents our detailed comments/suggestions regarding the actual SF 330 form.

- Part I, Question 23, Section 3 requires some clarification and/or revisions. The instructions inform you to enter the project end date in this field. Often individuals are assigned a role/task on a complex, long-term project; therefore, their role/task may be completed but the referenced project may still be ongoing. Therefore, using the project end date in these circumstances could lead to some confusion/misrepresentation regarding the individual's availability to provide services on an upcoming submittal which would have to be addressed in Section 4 of Question 23, creating an additional burden on the individual/firm. Additionally, individuals often highlight experience from previous employers on a resume. Therefore, project end date should be changed to the individual's completion date on the project in Question 23, Section 3. This would make tracking previous experience end dates easier and eliminate the need for additional explanation in Section 4.

1-14-02

608-100

- The wording in questions 23, Section 3, 29, Section A and 30, Section A should be changed from "year completed" to "actual/estimated completion date". This would eliminate the need to explain ongoing projects in Section 4 of Question 23 and Question 28 for Questions 29 and 30. This would make the burden lighter for the A/E firms while saving agencies from entering additional data.

- Question 34 seems unnecessary. It should be clear from reading the resume and project sections which individuals had roles on the projects presented in the SF 330 form. Question 34 seems to transfer the burden of creating a quick entry form from the agency to the A/E firm.

- Function Codes need to be clarified. Some disciplines that existed in the SF 255/SF 254 have been removed from the list applicable to Part II, Page 13, Question 9, Column B and replaced with more generic codes. For instance, would "Engineers: Transportation" include those individuals formerly categorized as traffic, railroad and transit engineers, and would "Administration" be a catch-all for individuals who do not fit into another discipline? In addition, "Project Manager" is a very broad function code, best describing a project role rather than an individual's primary discipline. We feel this code could be misapplied to more senior-level engineers, skewing the numbers in Part II, page 13, question 10, column A. This code should accurately reflect the engineering training/educational background of a firm's workforce.

- It would be much easier, if Part II could be entered electronically into a master database once a year showing all of the firm's staffing and project capability. This ultimately would save time and effort on part of both the A/E firms and agencies from duplication of effort throughout the year.

The thought and effort that went into creating the SF 330 form is evident in the thorough, well thought out manner in which the form was compiled.

If you have any questions or if I can be of any further assistance to you, please feel free to contact me by phone at (212) 465-5110 or e-mail at Rocchio@pbworld.com.

Sincerely,

Rhonda Rocchio

Rhonda Rocchio
Manager, Business Information

2000-608-101

Parallel Resource
1914 Hillbrook Circle
Auburn, AL 36830

December 14, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F St. NW Rm. 4035 ATTN: Laurie Duarte
Washington, DC 20405

RE: GSA Reference: FAR case 2000-608

Ms. Duarte,

My company produces software to assist architects and engineers complete the SF254 and SF255 called INWORK®. We have produced this software since 1989 and it is in almost 500 A/E offices from England to Guam. I and my staff work with these forms on a daily basis, either helping our clients or writing software for them.

It was with great interest that I reviewed your new form, the SF330. The SF254 and SF255 forms definitely needed revamping and this new form looks good. We did come up with just a few minor comments and have included them on the attached page.

I do ask though, that once the GSA finalizes the appearance and workings of the form, that a period of time be provided to allow software companies like ours, to develop/rewrite their software to accommodate the new form before the forms become manditory. This could assist A/E's to organize their data and more easily produce the completed forms.

Please keep us in the information and announcement loop concerning the new SF330 and other forms for A/E's. We have a vested interest in them. If I can be of assistance, please call on me.

Sincerely,
PARALLEL RESOURCE
A division of the Caperock Corporation

Scott Fischer

Scott Fischer
President

1-14-02

608-101

December 14, 2001

Comments regarding the proposed Standard Form 330 by Scott Fischer.
Parallel Resource: Producers of the 254/255 software INWORK®
(Contact: Phone: 334-821-9000 Email: scott@parallelresource.com)
GSA Reference: FAR case 2000-608

1) In your Federal Register announcement of 10/19/2001, the SF330 form's instructions started on page 1 and continued through page 7. The part for the respondent's information actually begins on page 8. The SF254/SF255 had a similar layout where the instructions were the first two sheets. From our experience, we suspect people interacting with this form will quickly begin referring to page 8 as page 1. This can be very confusing when working with clients over the phone, or by email or other written documentation. Our suggestion would be to make the first respondent page of the actual form be labeled as page number 1 and proceed through page 6. This could be accomplished by sequencing the instruction pages with lower case Roman numerals (i, ii, iii, etc).

2) The SF254/SF255 had (what became) a distinctive moniker/logo with the large characters SF254 or SF255 located in the upper left corner of the first page (oops, sorry, see item 1). This helped respondents identify the form more quickly on a desk piled with lots of other paperwork. The SF330 could have a similar, simple identifier, such as:

SF330 ARCHITECT - ENGINEER QUALIFICATIONS

PART I - CONTRACT-SPECIFIC QUALIFICATIONS

3) On page 9, we suggest that items 21 and 22 be reconfigured so that item 22 has access to the full width of the page (similar to item 28 in the project section). This is a section that respondents like to expound in (whether you want them to or not) and it would be simpler to allow them a text area covering the full width of the page. Same comment could apply (to a lesser degree) to items 23.x.(4) and 23.x.(5).

Davis

GSA

JAN 23 2002

GSA Office of Governmentwide Policy

MEMORANDUM FOR BARRY S. WILSON
DIRECTOR
DEFENSE ACQUISITION REGULATIONS COUNCIL

FROM: RODNEY P. LANTIER Rodney P. Lantier
DIRECTOR
REGULATORY SECRETARIAT

SUBJECT: New Consolidated Form for Selection of Architect-Engineer Contractors

Attached are additional comments received on the subject FAR case published at 66 FR 53314; October 19, 2001.

Response Number	Date Received	Comment Date	Commenter
2000-608-102	01/18/02	12/07/01	Stanley Consultants, Inc.
2000-608-103	01/18/02	12/14/01	COFPAES
2000-608-104	01/18/02	12/05/01	HPA
2000-608-105	01/18/02	11/28/01	KCI Technologies
2000-608-106	01/18/02	12/14/01	Ingram Parris Group

Attachments

U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405-0002
www.gsa.gov

2000-608-102

Stanley Consultants INC.

A Stanley Group Company
Engineering, Environmental and Construction Services - Worldwide

December 7, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

Dear Ladies and Gentlemen:

Subject: Comments on Modification to 48 CRF Parts 1, 36, and 53; FAR Case 2000-608; RIN 9000-AJ15; New Consolidated Form for Selection of Architect-Engineer Contractors; Proposed Rule

General Comments:

1. The proposed changes do provide for uniformity of A-E submittals, but they also severely limit our ability to provide in-depth and descriptive responses to the Government's design needs.
2. Too much emphasis is placed on distinguishing between corporate and branch offices. In this electronic age, A-E firms operate their corporate and various branch offices as one "virtual" office. We have all the required telecommunications systems to transmit drawings and other files electronically between offices more quickly than someone in the same office building could walk between floors. We can interactively discuss projects via telephone, e-mail, and video conferencing. Requiring A-E firms to distinguish between each office causes an enormous amount of additional record keeping and meticulous sorting of projects which have been performed by members located in more than one office.
3. Is there a required font type and size?

Part I, Section C, Items 12-14: We are apparently required to list each subconsultant and each of our branch offices which will be involved in the project. Are the branch offices to be designated as Prime, J-V Partner, or Subcontractor?

Part I, Section E, Item 22: The requirement to show "security clearance" becomes difficult because one cannot maintain security clearance between projects. Once the secure project ends, the clearance lapses until there is another need and application is made.

Part I, Section F, Items 28 and 31: In most cases, all nine listings in Item 31 will not be used. Is it permissible to transfer that unused space up to the project description in Item 28?

1/18/02

608-102

Part I, Section G: Use of a matrix of people vs. projects works well for small firms who use the same cadre of people all the time. Larger firms usually do not look very good on these comparisons because they use multiple people for the same types of projects. When only ten projects are shown, the matrix does not look very impressive. This is further extenuated by the use of multiple subconsultants.

Part I, Section H: The description of information designated for this section does not include the usual top selection criteria, e.g. "Specialized Experience and Technical Competence", "Professional Qualifications", and "Capacity to Perform the Work". Is it permissible to still include a summary of all selection criteria in this section? Will there be a limit on the number of pages for this section?

Part II: It appears A-E firms will be required to prepare a separate Part II for each of their branch offices. It will be very difficult for most firms to accurately fill out the "Revenue Index Number" (Item 10.c) for each Profile Code for each branch office. We certainly do not record our revenues that way. If a submittal is made from the corporate headquarters, would it be permissible to show all employees in item 9.c(1) and to disregard the item 9.c(2)?

We appreciate your efforts to modernize and standardize the SF-254 and SF-255 forms. However, the new restrictions will result in some very bland reading. Most importantly, your requirements to place an inexorable distinction between corporate and branch offices seems to be unwieldy. Please give consideration to relaxing these requirements.

Sincerely,

Stanley Consultants, Inc.

Lynn Pruitt

L. Lynn Pruitt
Vice President

llp18:kc:GSA ltr1.doc

2000-608-103

COFPAES

Council
On
Federal
Procurement of
Architectural &
Engineering
Services

December 14, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW
Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

RE: FAR Case 2000-608

Dear Ms. Duarte:

The Council on Federal Procurement of Architectural and Engineering Services (COFPAES), representing the five major professional societies in the A/E community, commends the task force that drafted the proposed Standard Form 330. The drafters of the proposed new form obviously put a lot of hard work into this form, and they have done the Federal agencies, and the A/E community a great service.

We generally support the form, and offer only these few minor changes.

1. The proposed SF 330 could be improved so that it more accurately reflects a more logical and state-of-the-art listing of functions and profile codes with regard to the treatment of surveying and mapping activities. We suggest that the list of disciplines (function codes) be revised by striking Cartographers, Geodetic Surveyors, Geospacial (sic) Information Systems Specialists, and Topographic Surveyors and replace them in a new list with a general category and sub category as follows:

Surveyor and Mapping Scientists:

__ Aerial Photographer
__ Cartographer
__ Geodetic Surveyor
__ Geographic Information Systems Specialist
__ Hydrographer
__ Image Analyst/Photo Interpreter/Photo Lab Specialist
__ Land Surveyor
__ Photogrammetrist
__ Remote Sensing Scientist

We also recommend revising the list of experience categories (profile codes), by striking Aerial Photogrammetry, Construction Surveying, GIS Development/ Analysis, Hydrographic Surveying, Land Boundary Surveying, Surveying: Platting, Mapping; Flood Plain Studies and Topographic Mapping and replacing them in a new list with a general category and sub category as follows:

American Congress on Surveying and Mapping
6 Montgomery Village Avenue
Suite 403
Gaithersburg, MD 20879
240/632-9716 Fax 240/632-1321

American Institute of Architects
1735 New York Avenue, NW
Washington, DC 20006
202/626-7405 Fax 202/626-7365

American Society of Civil Engineers
1015 fifteenth Street, NW, Suite 600
Washington, DC 20005
202/789-2200 Fax 202/289-6797

American Society of Landscape Architects
636 Eye Street, NW
Washington, DC 20001
202/898-2444 Fax 202/898-1185

National Society of Professional Engineers
1420 King Street
Alexandria, VA 22314
703/684-2862 Fax 703/836-4875

2/18/02

2000-608-103

COFPAES Comment
RE: FAR Case 2000-608
December 14, 2001

Surveying and Mapping

___ Aerial Photography & Airborne Data and Imagery Collection and Analysis
___ Cartography
___ Charting (Including Nautical and Aeronautical)
___ Close Range or Terrestrial Photogrammetry
___ Construction Surveying
___ Digital Orthophotography
___ Digital Elevation & Terrain Model Development
___ Environmental & Natural Resource Mapping (habitat, natural and man-made phenomena)
___ GIS Services: Development/Analysis/Data Collection
___ Geodetic Surveying (Ground and Airborne GPS)
___ Geospatial Data Conversion (including scanning, digitizing, compilation, attributing, scribing and drafting)
___ Hydrographic Surveying
___ Land Surveying
___ Location/Addressing Systems
___ Photogrammetry
___ Remote Sensing
___ Topographic Surveying and Mapping

Flood Plain Studies should be a separate, independent category and a new separate, independent category should be established for Environmental Planning.

2. We suggest that in Part II, item 5, the proposed form does not adequately provide a means for firms to indicate their class of ownership. We suggest boxes to be checked with each of the Government's various categories, such as small business, woman owned business, small disadvantaged business, HUB zone, Alaska Native Corp., etc.

3. We note that the draft requires that the total number of pages included in the submittal be provided with the page number on *every* page. This will result in extra word processing, and time consuming changes to every page when ever the offeror makes a change in its submittal. Rather, we suggest that each page should be numbered, but the total number of pages noted on the first page only. Then any pages added or subtracted will only impact the first page and the pages that follow the change. This will save time, paper and resources.

Again, COFPAES commends the authors of this draft for their effort. We hope these constructive changes will help make an excellent draft even better. We appreciate this opportunity to comment and urge the prompt adoption of the new form with these recommended improvements.

Sincerely,

David B. Mongan

David Mongan, PE, FASCE
COFPAES Chairman

HPA
HAN-PADRON ASSOCIATES
ENGINEERS

2000-608-104

December 5, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street NW, Room 4035
Attn: Laurie Duarte
Washington, DC 20405

RE: FAR Case 2000-608

Dear Ms. Duarte:

Han-Padron Associates is pleased to have the opportunity to comment on SF 330, the proposed replacement to SF 254, Architect-Engineer and Related Services Questionnaire, and SF 255, Architect-Engineer and Related Services Questionnaire for Specific Projects. We submit our comments on the attached page.

Very truly yours,

HAN-PADRON ASSOCIATES, LLP

Sue Tang

Sue Tang
Marketing Administrator

h:\market\registrations\new york office\sf 254-255 proposed changes\comments.doc

Attachment

Please take note that HPA is temporarily located at:
627 Broadway, 2nd Floor, New York, NY 10012 • Tel: (212) 260-9680 • Fax: (212) 260-9681

2/18/02

2000-608-104

General Services Administration
Attn: Laurie Duarte

Subject: FAR Case 2000-608
Comments on proposed SF 330

Thank you for the opportunity to comment on the proposed SF 330 as printed in the Federal Register on Friday October 19, 2001. Han-Padron Associates, LLP, has the following comments:

Part I, List of Disciplines (Function Codes)

Comment: Please add the following disciplines:
Coastal/Ocean Engineering
Engineer-Divers

Reason: There are many specialized firms like ours whose professional disciplines do not fall within the function codes. This puts our firm at a disadvantage, even when competing for work within our own specialties. In the work that we pursue, the disciplines most applicable to the project are listed last with no code that can be tracked in agency databases. In the case of Coastal/Ocean Engineering, it is inconsistent that "Coastal Engineering" is listed as an Experience Category (Profile Code), but there is no Coastal/Ocean Engineering discipline as a Function Code. Oceanographer (Function Code 35) is a completely different specialty, and is not engineering.

Part I, Section F.

Comment: It is not clear if reformatting of the form will be allowed, but there is not sufficient space in Block 28 or Block 33. This could be alleviated if unused lines, such as 31c through 31i, could be eliminated and blocks 28 and 33 expanded.

Explanation:

Block 28. This description is critical in explaining to the agency how a firm is best qualified to perform the work. It will be very difficult to describe a project of any complexity and to highlight its relevance to the contract in a space that is less than 1.5 inches tall.

Block 33 is to be used to provide "specific data requested by the agency for each example project." The space allotted does not allow for more than two lines of text, half the width of the page. This block is critical in explaining how a firm meets critical agency criteria, but allows virtually no room to respond.

Part II, Block 10.

Comment. The instructions for completing Column b of Block 10 are not clear.

Explanation. A possible method of filling in Column b is as follows:

The text describing the profile code or, if there is no profile code for this type of experience, text describing that experience.

2000-608-125

KCI TECHNOLOGIES

ENGINEERS · PLANNERS · SCIENTISTS · CONSTRUCTION MANAGERS

10 NORTH PARK DRIVE · HUNT VALLEY, MD 21030-1846 · 410-316-7800 · (FAX) 410-316-7817

November 28, 2001

Ms. Laurie Duarte
General Services Administration, FAR Secretariat (MVP)
1800 F Street, NW., Room 4035
Washington, DC 20405

Subject: SF 330 Comments

Dear Ms Duarte,

Thank you for giving us the opportunity to review and discuss the SF 330 proposed form and rules. Enclosed you will find KCI Technologies, Inc comments and questions regarding this new form.

If you have any questions, feel free to give me a call.

Deborah K. Brown
Marketing Assistant

Direct Dial Number: (410)527-4410
Fax Number: (410)316-7817

DKB

Enclosure

KCI TECHNOLOGIES, INC.

www.kci.com

2000-608-105

SF 330 Comments

General

- Taking away the SF 254 and replacing it with SF 330 Part II, does not show an accurate view of a firm's qualifications or experience. Many clients / consultants look closely at the 30 projects listed to determine a firm's past experience and the different clients a firm may have worked with.

- It will be very costly for the consultant to completely reinvent all their information. Consultants have been focused on the SF 254 and 255 for so long, using relational databases to house information. However, most of this information will have to be re-entered and reworked in order to fit into the smaller text boxes and new formats. This extra effort will cost the firms both time and money in either purchasing the latest database software package or administrative costs required to rework data and output forms?

- With all the available "check if photos attached", how will this form save any additional information. People will not only have a resume, but also pictures to back them up. The same with projects, instead of just one page with photos, there will be additional photos attached for each project, increasing the amount of paper, not decreasing it.

- Many of the box sizes seem too small - in order to fill in the appropriate information, consultants would be using fonts with size 8pt and smaller - which is very difficult to read.

- Do all attached pages (like photographs, org chart, etc.) need to have the page number and total page number boxes shown at the top of the other forms and where will they be inserted?

- What kind of implementation schedule is planned to allow firms to recreate their marketing materials and rework databases?

- Has any consideration been given to the firms that supply marketing databases that assist in preparing SF 255 and SF 254s and how much time they will need to rework data structures and outputs?

Part I:

- If each branch office that may participate on the project must fill out a form, how is this decreasing paper and marketing efforts?

- Where do we indicate MBE/DBE/SBE status, % of contract, etc?

Section A.3 - Title - Many federal contract names would not fit in this box.

- ***Section E – Resumes*** - No opportunity is given to provide a general overview paragraph of the individual, his or her previous employment, specializations, etc. which cannot be described as professional qualifications or projects. In addition, no opportunity is given to provide the persons title within the organization.

- ***Section E.21- Current Professional Registration*** – The block is not large enough should a person have more than 2 degrees and more than 2 registrations (some of our staff have over 10 registrations/certifications). Will there be a place to include all the rest of a person's pertinent degrees/registrations, such as additional paper?

- ***Section E.22. Other Professional Quals*** - This box needs to be expanded in size, especially if it is to be used for other degrees, other registrations, as well as awards, training, publications, organizations, etc. This information can be very relevant and lengthy. More room needs to be provided for all of this information. Using a large open box instead of tables for this information may prove more useful and versatile.

2000-608-105

- *Section E.23*

  (4) - Relevant Project Descriptions - This area of the table needs to be expanded. This is one of the most important areas of the resume. Can this information be expanded on an additional piece of paper or can additional projects be listed? If requested, should photos be attached on a blank page after each resume? Also, if photos are attached, how does this save paper? Currently, resumes normally don't include many project photos.

  (5) - Specific Role - This box needs to be expanded, this is also a key area of the resume. Can subcontractor projects be used and if so, where should that information be indicated?

Section F.28 - Brief Discussion of Project and Relevant to this Contract - This box needs to be expanded or consultants need to be allowed to further expand this information on an additional piece of paper. A discussion of complex, multi-discipline projects will not fit in this area. There is a lot of wasted space to indicate subconsultant roles –, most projects don't have up to 9 subs. Space could be better used for project descriptions, including complexities and innovation. Again, the attached photos only increase the use of paper.

Section F.33 - Additional Project Information - Box needs to be expanded.

Section G –Key Personnel - How do we handle the subconsultant's projects in the matrix? Also, what if there are more than 19 key staff personnel, including subs? Do we include additional sheets?

Part II:

Will these forms need to be created each time a consultant responds to a project and will the data need to be up-to-date as of the submittal date? The SF 254 required updating within the last 12 calendar months; will the SF 330 require more updating? Most large firms only update the information at the end of the year, and sometimes twice per year.

Block 9 - Employees by Discipline - This table does not allow enough room for large multi-disciplined firms to fill in the appropriate disciplines. How do we handle disciplines which are not listed but define our employees, such as Divers, Cost Estimators, etc.?

Block 10 - Profile of Firm's Experience - This table does not allow enough room for large multi-disciplined firms to fill in the appropriate disciplines. The block has only 21 spaces for profile codes, yet there are over 100 profile codes listed, and many more categories not represented. How do we handle categories that are not listed but define our experience, such as underwater engineering, value engineering, claims analysis, wetlands, diving etc.? How do we handle knowing which we put in and which we don't? Will Part II have to be redone for every submittal using only applicable codes? This part is very confusing and will not reflect each firm's capabilities and experience, plus, if it needs to be done new for each project, it will cost the consultant both time and money.

Block 11 - Annual Average Professional Services Revenues - Consultants were never required to track federal vs. non-federal work for branch offices.

2000-608-106

December 14, 2001

FAR Desk Officer
OMB, Room 10102
NEOB
Washington, DC 20405

RE: Standard Form 330 - Replacement for Standard Form 254 / 255
(OMB Control No. 9000-00XX, FAR Case 2000-608 New Consolidated Form for Selection of Architect-Engineer Contractors)

To Whom It May Concern:

IPG is a small business architectural firm located in Valdosta, Georgia, with a current staff of 18. Our firm has open contracts with several Federal clients including, the US Department of Veterans Affairs, the US Army, US Air Force, and US Postal Service. We have worked with the US Army Corps of Engineers, the US Marine Corp, and other Federal agencies as well throughout the years.

In review of the proposed Standard Form 330, it becomes apparent that the time burden has been calculated only on the 29 total hours needed to *actually complete* the form, inclusive of time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. While this may be an accurate estimation, it takes little or no consideration into factors which will be a major part of the completion of this form; i.e., the technological collection and assessment of data and the replacement of existing methods currently used to complete Standard Forms 254 and 255. One primary example is that the data bases which are used to complete Forms 254 and 255 are coded by Discipline, Function Code, and Profile Codes. This one item could cost hundreds of hours in the examination of projects which date back over 5 years.

In addition, in the *"Annual Reporting Burden"* section, it additionally states, "Because of the tailoring required by the form for each project submittal, there are virtually no savings in burden hours by repeat submittals." In consideration of the fact that many portions of the SF 255 can be reused; i.e, primarily Paragraph 7's, Paragraph 8,'s, Paragraph 9's, and in many cases, Paragraph 10's, is seems unnecessary to replace a well-established method for reporting with one that, by nature of its custom tailoring, produces more of a time burden on reporting.

In the Federal Government's responsibility to small business, it seems that small businesses have been overlooked in the creation of this form. While large companies may have the resources and personnel to expend on tasks such as reassessment of projects, and preparation of data bases, small businesses generally do not. Your reconsideration of the continued use of Standard Form 254 and 255 is appreciated.

Sincerely,

Ingram Parris Group

Jim Ingram, President

JI / mst

cc: General Services Administration
FAR Secretariat (MVP)
1800 F. Street, NW, Room 4035
Washington, DC 20405

2/18/02

Cecilia Davis

GSA

MAR 7 2002

GSA Office of Governmentwide Policy

MEMORANDUM FOR BARRY S. WILSON
DIRECTOR
DEFENSE ACQUISITION REGULATIONS COUNCIL

FROM: RODNEY P. LANTIER Rodney P. Lantier
DIRECTOR
REGULATORY SECRETARIAT

SUBJECT: New Consolidated Form for Selection of Architect-Engineer Contractors

Attached are additional comments received on the subject FAR case published at 66 FR 53314; October 19, 2001.

Response Number	Date Received	Comment Date	Commenter
2000-608-107	12/17/01	12/17/01	Marilyn Nedell
2000-608-108	12/13/01	12/13/01	Pond & Company
2000-608-109	12/13/01	12/13/01	ASPRS
2000-608-110	12/17/01	12/17/01	Foster Wheeler Environmental Corporation
2000-608-111	12/18/01	12/18/01	DOD/Navy
2000-608-112	12/18/01	12/21/01	MKEC Engineering Consultants, Inc.
2000-608-113	12/24/01	12/24/01	HartCrowser
2000-608-114	01/04/02	01/04/02	Horner & Shifrin, Inc.
2000-608-115	01/16/02	01/16/02	WDM Architects
2000-608-116	02/04/02	02/04/02	Alison Lawrence
2000-608-117	02/11/02	02/11/02	Jennifer Seiler

Attachments

U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405-0002
www.gsa.gov

2000-608-107

"Nedell, Marilyn B NWP" <Marilyn.B.Nedell@nwp01.usace.army.mil>

12/17/2001 09:46 AM

To: "'farcase.2000-608@gsa.gov'" <farcase.2000-608@gsa.gov>
cc:
Subject: FW: SF 330 form concerns

The following is a list of comments and concerns to be forwarded to the SF 330 panel

Concerns about the data content of the proposed SF 330 form:

1. Firms are not required to submit a unique identifier, such as an ACASS number. This will make it extremely difficult to track firm hierarchies, mergers, past performance history, etc. Even a DUNS number does not provide this tracking capability. (The ACASS number is assigned by the DOD-mandated ACASS past performance tracking system. Assignment of an ACASS number ensures firm history is accurately tracked for the life of the firm. The ACASS number is currently listed in block 2b of the SF 255 form).

2. Part II, block 11 only summarizes history for 3 years. This will have a very negative impact on the six-year history-window required by FAR part 36.201.4.c

3. The form captures the firm's experience and disciplines by project, but there is no overall profile/summary of a firm's experience and discipline codes

Concerns regarding the transition from the SF 254/255 to the SF 330 form, should the SF 330 form be implemented:

1. Added cost to firms, to procure commercial software for completing SF 330 forms

    a. Current non-availability of commercial software to be used by firms for completion of SF 330 forms.

2. Within the DOD-mandated ACASS past performance tracking system, qualified firm searches are performed on the experience and discipline codes, to identify firms to contact for work that can be awarded non-competitively. The revision of the codes will result in non-retrieval of firms when both the old and new codes are not specified. This concern is related to bullet number 3 in the above section.

3. Instructions will need to be issued to ensure a fair and accurate comparison and transition is made between new and old codes. The DOD-mandated ACASS system retains SF 254 information for one year. Qualified firm searches are performed to identify firms qualified to perform non-competitive work. During the first year of implementation of the proposed SF 330 form, retrieval of firm information will need to accommodate both forms. Additionally, the reviewing and selecting officials will need a tool to fairly compare the codes on the SF 254 with the new codes on the SF 330.

4. Adequate lead-time must be given, prior to implementation of the SF 330 form, to allow merging of the data with pre-existing SF 254 data within the ACASS programs. This should include time to program and test changes to the ACASS system, and also to distribute information to the A&E and federal sectors.

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I www.pondco.com

2000-665-108

December 13, 2001

FAR Desk Officer, OMB
Room 10102 NEOB
Washington, D.C. 20503

RE: Comments Regarding Paperwork Burden of Proposed SF 330

Dear Sir or Madam:

I would like to thank you for the opportunity to comment on the above referenced subject. Hopefully the feedback you get from the architecture and engineering community will be useful to you as you move forward with this effort.

While I understand that changes need to be made to the 254/255 process, I do have several questions that I hope can be addressed without any unnecessary burden on your staff. I look forward to the responses to the following:

1. Will the new SF 330 be provided to Consultants electronically in a word processing program? (MS Word or equivalent?)
2. Are the forms expandable? Will consulants be able to modify the size of the boxes in the table to allow data to be inserted? If not, room provided on the sample form will not be adequate to demonstrate the level of experience and detail needed for consideration as pertains to both staff experience and project experience.
3. Use of attachments (Sections C, D, E, & F) will create a substantial amount of additional paper that is submitted with each proposal. Additionally, attachments are easier to get "lost in the shuffle." The current format allows all information to be somewhat self-contained and eliminates the chance of information being misplaced.
4. If this revised format is approved, when would Consultants be required to start using the new SF 330?
5. Will the A/E community be provided a detailed list of questions and comments submitted on this subject? Will answers to those questions and comments be available to the A/E community? If so, when is the anticipated release date of those documents?

I look forward to hearing back from you and I wish you the best of luck as you forge ahead with this effort.

Sincerely,

Cari Gerrits

Cari Gerrits
Marketing Coordinator

CC: GSA
File

asprs

THE IMAGING & GEOSPATIAL INFORMATION SOCIETY

December 13, 2001

2000-608-109

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW
Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

RE: FAR Case 2000-608

Dear Ms. Duarte:

The American Society for Photogrammetry and Remote Sensing is a professional society of more than 6000 individual members and 140 commercial firms, engaged in professional surveying and mapping services, many of which are contractors to the U.S. Government. We appreciate this opportunity to comment on the proposed SF 330, for Architect-Engineer Qualifications.

ASPRS commends the task force that developed the SF330, and recognizes the level of effort that was involved in preparation of this proposal. We generally find the new form to be an improvement over the current 254-255, and believe it will not only save time for competing firms, but provide much more useful information to Federal contracting agencies.

One area where we believe the proposed SF 330 may be further improved relates to the terminology used to characterize the surveying and mapping profession. We believe the proposed SF330 does not adequately reflect state-of-the-art surveying and mapping practice, the full range of services currently provided by surveying and mapping firms, or the range of services required by and procured by Federal agencies.

The proposed SF 330 has a List of Disciplines (Function Codes) and a List of Experience Categories (Profile Codes) that we believe could be better organized to provide both the competing firms and the evaluation teams in the contracting agencies with an enhanced ability to fully consider the personnel and experience of surveying and mapping firms. As a result, we recommend revisions to the proposed forms as outlined in the attached document.

These proposed revisions have been developed jointly by ASPRS, the Management Association for Private Photogrammetric Surveyors (MAPPS) and the American Congress on Surveying and Mapping (ACSM). It is our understanding that MAPPS and ACSM will be filing separate, but similar comments. The attached proposal reflects the combined and unified recommendation of the surveying and mapping community, including those individuals in private practice, as well as those in government services, including the Federal surveying and mapping workforce.

Again, we commend the team that worked on development of the proposed SF 330. We appreciate this opportunity to comment and urge the adoption of the SF 330 with these recommended improvements.

Sincerely,

James R. Plasker
Executive Director

Attachment

5410 Grosvenor Lane, Suite 210, Bethesda, Maryland 20814-2160 301.493.0290 301.493.0208 asprs@asprs.org

608-109

Recommended SF 330 Changes RE: Surveying and Mapping

Revise the List of Disciplines (Function Codes) by striking:

Cartographers
Geodetic Surveyors
Geospacial (sic) Information Systems Specialists
Topographic Surveyors

And re-organizing them in a new list with a general category and sub category, just as the form proposes for Engineers. Our proposal is to list surveying and mapping disciplines as follows:

Surveyor and Mapping Scientists:
__ Aerial Photographer
__ Cartographer
__ Geodetic Surveyor
__ Geographic Information Systems Specialist
__ Hydrographer
__ Image Analyst/Photo Interpreter/Photo Lab Specialist
__ Land Surveyor
__ Photogrammetrist
__ Remote Sensing Scientist

We would also suggest adding a general category for "Engineering/Design Software Developer"

Revise the List of Experience Categories (Profile Codes), by striking:

Aerial Photogrammetry
Construction Surveying
GIS Development/Analysis
Hydrographic Surveying
Land Boundary Surveying
Surveying: Platting, Mapping; Flood Plain Studies
Topographic Mapping

And re-organizing them in a new list with a general category and sub category. Our proposal is to list surveying and mapping disciplines as follows:

Surveying and Mapping

___ Aerial Photography & Airborne Data and Imagery Collection and Analysis
___ Cartography
___ Charting (Including Nautical and Aeronautical)
___ Close Range or Terrestrial Photogrammetry
___ Construction Surveying
___ Digital Orthophotography

___ Digital Elevation & Terrain Model Development
___ Environmental & Natural Resource Mapping (habitat, natural and man-made phenomena)
___ GIS Services: Development/Analysis/Data Collection
___ Geodetic Surveying (Ground and Airborne GPS)
___ Geospatial Data Conversion (including scanning, digitizing, compilation, attributing, scribing and drafting)
___ Hydrographic Surveying
___ Land Surveying
___ Location/Addressing Systems
___ Photogrammetry
___ Remote Sensing
___ Topographic Surveying and Mapping

Flood Plain Studies should be a separate, independent category and a new separate, independent category should be established for Environmental Planning.

2000-608-110

FOSTER WHEELER ENVIRONMENTAL CORPORATION

MARIA WITKOWSKI
Director, Marketing Services

TEL 973-630-8028
FAX 973-630-8590

December 17, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

**Re: New Consolidated Form for Selection of Architect-Engineer Contractors
FAR Case 2000-608**

Dear Ms. Duarte:

Enclosed please find comments from Foster Wheeler Environmental Corporation to the proposed Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council proposal to amend the Federal Acquisition Regulation (FAR) to replace SF254, Architect-Engineer and Related Services Questionnaire, and SF255, Architect-Engineer and Related Services Questionnaire for Specific Projects, with SF330, Architect-Engineer Qualifications.

General Comments
The space restrictions of the new forms are extremely limited in the amount of information that one can provide. Even if a very small font were used, it would be extremely difficult to adequately present the required information. It is also not clear if the information provided must stay within the form or if continuation pages will be allowed.

Part II eliminated the 30 projects previously required in the SF254, and is now extremely streamlined. Will this information be counted towards the award decision?

In order to provide ease of transmittal and eliminate extensive paper copying, we suggest that the Government make the form a web-based submission.

Section D
The Organizational Chart requirements in Section D are confusing. The instructions request an organizational flow diagram while also requesting key personnel. We suggest having two-organization charts-one that shows an organizational chain of command, and one that focuses on the functional roles of key personnel.

608-110

Section F
The wording in Section F for the projects gives weight to projects where the team has previously worked together, as opposed to the strength of the prime in the requirements of the contract. It also does not allow ample space to describe the project and establish relevance. We suggest that the form give more weight to the strength that the prime brings to the project and allow for continuation pages.

Thank you for the opportunity to support this process. Should you have any questions or comments, please call me at (973) 630- 8028.

Very truly yours,

Maria Witkowski

Maria Witkowski

Cc: FAR Desk Officer
OMB, Room 10102
NEOB, Washington, DC 20503

2000-608-111

DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND
1322 PATTERSON AVENUE, SE SUITE 1000
WASHINGTON NAVY YARD DC 20374-5065

IN REPLY REFER TO

18 Dec 01

From: Commander, Naval Facilities Engineering Command
To: General Services Administration, FAR Secretariat

Subj: PROPOSAL TO AMEND FAR TO REPLACE SF 254, ARCHITECT-ENGINEER AND RELATED SERVICES QUESTIONNAIRE FOR SPECIFIC PROJECTS WITH SF 330, ARCHITECT-ENGINEER QUALIFICATIONS

Ref: (a) FAR Case 2000-608

1. We have reviewed the subject proposed rule and believe consolidating the SF 254/255 into a SF 330 is an efficient and practical way to evaluate architect-engineering qualifications. The following minor comments and suggestions are provided:

(a) Instructions - Section E, Block 23 - add language to explicitly allow projects performed from other employers.

(b) Instructions - Section F, paragraph (1) - add "no more than" ten projects….

(c) Instructions - Section F, Block 28 - Consider noting a maximum number of photos that can be provided per project. A/Es tend to get carried away with this and send books of photos.

(d) Form - Section E, Block 22 - increases this block to accommodate more information. Most "key" personnel tend to come along with a substantial list of other professional qualifications.

(e) Form - Section E, Block 23 - change the title of the first block from "professional services" to "design services" or "design completion". Most A/Es are contracted to provide PCAS services as well and it may be confusing since they also provide professional services during construction.

608-111

(f) Form - Section F, Block 29 - also change from "professional services" to "design services" or "design completion".

(g) Under the list of disciplines (functional codes) - add a code for Anti-Terrorism Force Protection (ATFP).

(h) Under code D04 - "Design Build" - split it up by RFP preparation and design (for construction).

(i) Under code H01 - change to "waterfront facilities"; (piers, ships, etc.).

2. We support and agree that an electronic version of this form will improve the time constraints involved with preparing this required information.

3. The Point of contact is Frances Sullivan, who can be reached at (202) 685-9146, Sullivanfl@navfac.navy.mil.

Robert M. Griffin

ROBERT M. GRIFFIN
By direction

2000-608-112

December 21, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
Attn: Lauri Duarte
Washington, DC 20405

Reference: FAR Case 2000-608
SF 330, Proposed Rule

Dear Ms. Duarte:

We believe the proposed changes in Federal Acquisition forms (as referenced above) are unnecessary and irresponsible, and should be abandoned.

First, the change is unnecessary. The SF254 and SF255 have worked well for many years. If changes are necessary, and we are not aware that they are, then do them incrementally. From the Federal Facilities Council's (FFC) Technical Report No. 130, Part 3, we note that "90 percent of the government and 73 percent of the private sector are pleased with the current forms." Further, another FFC report shows a strong consensus among the respondents that the SF 255 is an essentially effective format for presenting A-E qualifications for a specific project.

Second, the change is unreasonable. Total replacement of these forms will cause excessive initial and on-going cost to the consulting engineering community. Your own figures indicate we will spend twenty-times more effort in preparing the SF 330, Part 1 Form compared to the SF 255 Form. We are particularly concerned that the extra business costs are involved in fixing what doesn't need fixed.

Similarly, the cost of preparing the SF330, Part II of the proposed form is estimated by the Government to take four times as much time as the present SF 254 Form. The cost burden will be further magnified by learning curve costs, and in all likelihood, having to maintain dual systems; one for the state and one for the federal government.

We strongly encourage you to reconsider the course of action being evaluated.

Sincerely,

MKEC ENGINEERING CONSULTANTS, INC.

Kenneth Kallenbach

Kenneth Kallenbach, AICP

KK/dm

c: Kansas Congressmen (6)

K:\WP\MARKET\Duarte@GSA.wpd

2000-608-113

HARTCROWSER
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December 24, 2001

General Services Administration
ATTN: FAR Secretariat (MVP)
1800 F Street, NW., Room 4035
Washington, DC 20405

Re: Review of Proposed Standard Form (SF) 330
J-99000

To Whom It May Concern

The following comments are pertinent to the proposed SF 330, and are keyed to the form page numbers:

General Comments:

1. Recommend that in addition to providing the DUNS number, space be provided on the SF 330 form for administrative data such as TIN Number, CAGE Code, CCR Number and ACASS Number.

2. The public reporting burden for this collection of information is under estimated when stated that it is estimated to average a total of 29 hours per response (25 hours for Part 1 and 4 hours for Part 2). A closer approximation might be 290 hours per response (250 hours for Part 1 and 40 hours for Part 2). This will depend on the requirements listed in the Commerce Business Daily (CBD) solicitation for the Statement of Qualifications (SOQ). The soliciting agency must evoke a page limit possibly for Sections E and F and definitely for Section H along with refining their scopes of work so they state exactly what they want. Allowing submission lengths to be limited will assist in this area, but will not eradicate the massive effort required to develop a successful SOQ. Soliciting agencies of the federal government must develop better, clearer, refined solicitation statements/statements of work (SOW). If not, the responder must develop a very lengthy SOQ in order to cover the entire agency specified criteria. The rule in the private sector has been that to win large government contracts under this type of proposal format requires extensive effort exerted to out-compete the competition. I would hope that this would change.

Anchorage
Boston
Chicago
Denver
Fairbanks
Jersey City
Juneau
Long Beach
Portland
Seattle

1910 Fairview Avenue East
Seattle, Washington 98102-3699
Fax 206.328.5581
Tel 206.324.9530

608-113

Page 1:

1. **Purpose:** Recommend listing appropriate CBD categories, SICs and NAICs under the purpose paragraph for clarification.
2. **General Instructions, Para 2**: The SF 330 seems to place a great deal of emphasis on breaking out an individual firm's branch offices, both in Part 1 and Part 2; which will require additional time and paperwork. With telecommunications so readily available now, most A-E firms with multiple offices readily share resources among their branches and have been doing so for quite some time. Consequently, for ID/IQ contracts depending on the nature of the actual delivery orders, it is possible that a number of branch offices may be involved. Based on the SF 330 instructions, it would appear that a company would have to provide individual information on all of its branch offices to ensure it covers all the bases with respect to the statement of work and requirements specified in the CBD solicitation. An easier approach may be to allow firms the option of highlighting the branch office with will be most involved in the contract, and then list the rest of the firm as a whole. Considerable time, effort, and paper could be saved for some firms.

Page 2:

1. **Part I, Section C. Proposed Team, Items 12-14**: Recommend that the role of each firm that will be involved in performance of this contract needs also be specified/defined (i.e., prime, sub, specialty and whether the firm is a SB, SDB, WOB, Hub-Zone Business, or Vet-Owned Business).

Page 3:

1. **Part I, Section F, Example Projects Which Best Illustrate Proposed Team's Qualifications for this Contract, Item 33, Additional Project Information**: Recommend adding space to the form and a requirement to address adherence to project budget, schedule and quality since most, if not all agencies require this information anyway. Serious consideration should also be given to requiring the responder to specify the overall ACASS performance evaluation for the project, if available.

Page 5:

1. **List of Disciplines (Function Codes)**: Recommend that the following disciplines and function codes be added and/or modified:

608-112

Code	Description
03	Biologists (wetlands, fisheries, marine, etc.)
10	Ecologists (wetlands, etc.)
	Compliance Specialists
	Cultural Resource Specialists
	Geochemist
	Geomorphologist
	Geostatistician
	Historian
	Hydrogeologist
	Marine Scientist
	Natural Resource Specialist
	Process Engineer
	Quality Engineer
	Regulatory Specialist
	Remediation Engineer
	Ocean Engineer
	Sediments Remediation Engineer
	Water Resource Engineer

Questions and/or comments with respect to the above should be addressed to the undersigned at (206) 324-9530 or tbn@hartcrowser.com.

Sincerely,

HART CROWSER, INC.

THOMAS B. NICHOLS
Senior Associate, Corporate Quality Manager

cc: Robert L. Frazier
MaryBeth Hughes

HORNER&SHIFRIN, INC.
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2000-608-114

ENGINEERS
ARCHITECTS
PLANNERS

January 4, 2002

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
Attn: Laurie Duarte
Washington DC 20405
December 18, 2001

Re: FAR case 2000-608

Dear Ms. Duarte:

Having reviewed the proposed SF 330 I find it to be an improvement over the present SF 254 and SF 255.

However, I do have a serious problem with the proposed inclusion of the professional fee and the construction cost of each project being listed, thereby allowing the reviewers to determine the percentage, based on construction cost, attributed to professional fees. Use of such fee cost information, as a basis or partial basis, for selection of professional services is a violation of the Brooks Act. The fee information is deemed unnecessary and extraneous to the process of selecting professional service firms in accord with the Brooks Act at very best, and at very worst, it appears to violate and/or diminish the very spirit of the Act. Federal employees and other selection personnel should not be subjected to this potential violation of this important Federal Act assuring professional service providers are selected by a qualification based selection process.

I strongly urge that such fee information be removed from the proposed SF 330 to eliminate any conflict with the Brooks Act.

Sincerely,

Thomas W. Stevener
Vice President
Business Development

wdm
architects

2000-608-115

January 16, 2002

General Services Administration
FAR Secretariat (MVP)
1800 F. Street, NW, Room 4035
Washington, DC 20405

Attn: Laurie Duarte

Re: FAR Case 2000-608
SF 330, Proposed Rule

Ms. Duarte:

As the deadline looms for comments on the proposed new SF 330 Form, I am finally able to make some time to comment.

I believe the new form is a bad idea for several reasons. They include:

- A host of redundant information requirements
- A ranking system that allows the reader to "keep score"
- The reporting requirements that will require more, not less paperwork
- Increased costs for the research required to support the reporting requirements
- The fee information requested violates the Brooks act

Additionally, the government's own documents (Technical Report 130) state that "90% of the government and 73% of the private sector are pleased with the current forms."

The purpose of submitting forms to government agencies who hire architects is to share our qualifications which directly relate to the project. The current SF 255 does an excellent job of this. Many agencies also outline specific reporting modifications they require in the solicitation.

Because hiring an architect is a very personal decision on every level, our goal as architects is to get "face time" with decision makers. The proposed SF 330 will not allow that because Section G basically serves as a scorecard allowing reviewers to "check off" firms that don't have the correct box filled in.

2000-608-115

I won't bore you with the substantial time requirements that it already takes me to deal with the current forms. Suffice it to say that I spend 50% of my time between January 1 every year and the deadline for submitting forms in preparation. Our on-staff accountant is also equally involved.

Finally, the requirement to show specific fees for a specific project is a direct violation of the Brooks Act. The intent of Brooks Act is to hire architects based on qualifications, not fees. This requirement also allows the agency to check their estimates for professional fees, and potentially "price fix" certain types of projects.

In summary, my thoughts on the SF 330 are easy. Let's leave well enough alone. Change for the sake of change is not always good. I realize some bureaucrat somewhere is trying to justify their existence. But please, not at my expense or at the expense of the architectural and design community in this nation.

Sincerely,
WILSON DARNELL MANN P.A.

Steve

Steve Hauck
Director
Marketing and Public Relations

2000-608-116

GSA

Alison B. Lawrence

02/04/2002 01:19 PM

To: Cecelia L. Davis/MVP/CO/GSA/GOV@GSA
cc: Dolores K. Fernandez/8PC/R08/GSA/GOV@GSA
Subject: FAR Case 2000-608

Hi Cecilia. Is FAR Case 2000-608, New Consolidated Form for Selection of Architect-Engineer Contractors, yours? I have a late comment from our Regional Architect. On the SF 255 there was a column where the respondent could indicate whether consultants had worked with the prime before (see page 4 of the SF 255). He felt this was good information to have; the question is not asked on the new form. The logical place to add the column would be on page 8 of the SF 330.

Thank you for your consideration of this late comment!

Alison Lawrence
Procurement Analyst
Office of Resource Development (8PG)
(303) 236-4300 ext. 241

2000-608-117

"Jennifer Seiler"
<jseiler@adrinc.com>
02/11/2002 02:05 PM
Please respond to
jseiler

To: farcase.2000-608@gsa.gov
cc:
Subject: Comments and Changes

I realize that I have now missed the deadline for the opportunity to submit comments regarding the new SF330 Architect-Engineer Qualifications.

However, I am interested in reading the comments that have been submitted - are these available to view on the GSA website? And, I would like to know when a final ruling/form will come out. Are there any estimates?

Finally, I am interested in any training that might be offered to help with filling out the new forms. Do you anticipate that the GSA will run any workshops/conferences to assist firms in filling out the new forms?

Thanks,

Jennifer Seiler
Technical Communications Manager
BAE SYSTEMS ADR
9285 Commerce Highway
Pennsauken, NJ 08110
Voice: 800/257-7960 Fax: 856/486-7778

APR 23 2002

GSA Office of Governmentwide Policy

MEMORANDUM FOR AL MATERA
CHAIRMAN
CIVILIAN AGENCY ACQUISITION COUNCIL

FROM: RODNEY P. LANTIER
DIRECTOR
REGULATORY SECRETARIAT

SUBJECT: New Consolidated Form for Selection of Architect-Engineer Contractors

Attached is a comment received on the subject FAR case published at 66 FR 53314; October 19, 2001.

Response Number	Date Received	Comment Date	Commenter
2000-608-118	04/18/02	04/18/02	Architecure Engineering Marketing Association of Alaska

Attachment

U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405-0002
www.gsa.gov

2000-608-118

Architecture / Engineering
Marketing Association of Alaska

Organization's Mission: *Enhance the marketing and business development of Architecture and Engineering Firms*

Laurie Duarte FAX 202-501-4067
General Services Administration
FAR Secretariat (MVP)
1800 F St., NW, Room 4035
Washington, DC 20405

RE: FAR Case 2000-608

Dear Ms. Duarte:

Found your name in the Winter 2001 issue of Market Share.

For months, the Board of Directors of the A/E Marketing Association of Alaska has been encouraging our members to evaluate and forward comments on the Proposed SF 330. We have sent numerous messages to the e-mail address shown in the Proposed Form. We have phoned Washington DC and tried to get questions answered, but no one seems to know the answers.

I am attaching a compilation of comments on the proposed Form, and would GREATLY appreciate some acknowledgement that our concerns will be considered… or even that they have been received!

Evelyn

Evelyn P. Clark, CCA
Coffman Engineers
800 F Street
Anchorage, AK 99501
907/257-9242 Direct
907/276-5042 Fax
clark@alaska.coffman.com
www.coffman.com

2000-608-118

DRAFT SF330 Form
Comments and Questions from Alaska A&E Firms

Because of the extensive comments we have, we request that the Government solicit additional comments on a second draft BEFORE implementing these changes permanently.

GENERAL COMMENTS AND CONCERNS, AND QUESTIONS REGARDING INSTRUCTIONS:

- Is there an implementation date set (or being considered) for switching from SF254/255 to SF330? During implementation period, will there be some continued use of SF254 and SF255 allowed?

- Annual reporting burden seems to be GROSSLY underestimated. Even a small-sized consulting firm can easily respond to one request for qualifications a month. Multiply twelve responses a year times multiple submittals for each project (because of the new matrices, an engineering firm offering multiple disciplines will now have to submit unique responses for each combination of disciplines requested by the prime consultant).

- Suggest adding a space (perhaps on the first page of Part I) for A-E's web site. With the limited amount of space in these proposed Standard Forms, the selection committees may want to do their own research on the WWW.

- Which information will be provided and input into the ACASS system maintained by the Corps? If it is Part II, then the solicitation number should be removed, and this could be an annually updated form (attached to Part I if required by the contracting agency).

- Will this form be used for design/build work? If so, there will be an entirely separate set of questions generated by contractors seeking to use this proposed form.

- "Separate Part 2 for each firm and branch offices on the team": This could mean that we feasibly would need to turn in seven Part 2s if we had team members from each of our offices. This doesn't reduce paperwork.

- The FAR definition of "Firm" doesn't differentiate between headquarters and branch offices, but the form asks for it on Page 8.

- It states (on page 1 of Draft form) that Individual Agencies may supplement the requirements. Would this be with additional forms, questions, or simply limiting pages, etc?

- Page 1 states that a benefit of the form is to "Facilitate electronic usage by organizing the form in data blocks?" Does this mean that this form will be provided electronically? If so, what format will it be supplied in?

- What software will be used to "facilitate electronic usage"? A database is really required to organize this amount of data… on the firm and each employee of each office or branch. Any software that is NOT a database will not facilitate electronic usage.

- It is unclear when Part 1 will be required. Is it based on a dollar amount or is it subjective and up to the contracting officer. (See language on Page 2, under 36.603 (b))

608-118

- Will A/Es be able to submit the SF330 form(s) electronically?

- Has the Government created a "test" RFP response? If so, what database program did they use to develop it? Would the government be willing to provide the A/E community with a copy of this "dummy test response" so we know what your intentions are. If not, how do they "know" this form will work with database applications?

- The form does not appear to provide guidelines for font types and sizes and the rows are very small. Is it the Government's intention to allow the same type of redesign that have morphed the 255s or are these forms intended to be "locked." If locked, how are we to provide all of the information in the spaces provided? Teeny, tiny type? This will be very hard on your reviewers!

- The amount of text required on each page, and the number of matrices included, will not allow much "white space" to relieve the eyes of the reviewers. These small spaces will be very difficult to read when completed.

- Page 4 – Under Part II instructions, items 10 and 11: For firm's experience categories, FIVE years history is requested under item 10, yet annual average professional services revenues only requests the last three years. For consistency, the same number of years should suffice for both pieces of information. Suggest three years for both items 10 and 11.

- Page 5 – List of Disciplines (Function Codes): Although the rationalization for changing to SF 330 includes the hope that the new form "reflects the industry", the revisions proposed do not reflect the A/E industry. For example:
  - Generally, a CADD Technician and a Drafter serve the same function. There are only a miniscule number of hand drafters left and most of those are also CADD Technicians.
  - Communications Engineers in the industry are generally also electrical engineers.
  - Electronics engineers in the A/E industry are generally not the same as an electrical engineer, and they are not interchangeable
  - Specifications do not necessarily fall under Engineering. Many architectural firms have specifications specialists. Specifications are should be a stand-alone discipline.
  - Information systems also should be removed from the Engineers category, and listed as a separate discipline.

COMMENTS ON PART 1 – CONTRACT-SPECIFIC QUALIFICATIONS:

- Page 8: What value is there to requiring that the actual and total number of pages be listed on each page? This would cause problems for the A/E when total page numbers are altered, in that each sheet will then need to be changed and/or reprinted.

- Page 8: Item 16 – Space provided will only allow a two or three word explanation of each person's role. For some specialty services, this might not be so easily self-explanatory.

- Page 8 - Part D of Part 1 - Organization Chart states "Organization chart of firms and key personnel." Taken literally, it appears the contracting officer will want a corporate organization chart for EACH firm, highlighting team personnel? (See page 4 and page 10). Would not a team chart be more useful?

- Will the organization chart need to be included in page numbering?

- Page 9, Item 23 – Space is provided to check if photos are attached. Will there be a requirement for

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some sort of standard title blocks to tie photos back to Page ?

- Pictures: This is a very touchy issue. The reason for the touchiness is that many firms have pictures made of their projects, but the pictures are copyright protected. If Joe was involved in a project with one firm but moved to another firm, he may not have the right to use that picture. You're leaving the government open to problems. It's better to just have project pictures for the firm.

- Section E asks for resumes to be grouped by firm with the prime first. This implies that the Part 1 is always a combined submission. (One Part 1 for the team, versus one Part 1 from each participating firm.). Is the Part 1 always going to be a "combined" document including all firms?

- If Section E is always a combined form for the entire team... will the matrices of experience by individuals on specific projects make it more likely for teams to submit sub-consultants that they have always worked with in the past... as opposed to the BEST sub-consultants for the upcoming project? Where is the incentive to bring new talents and experience to the selection of team members?

- Under the Resume section for "Relevant Projects" if the agency does ask for photos, will you be downgraded for not having them? Also by limiting the number of projects to five, you may be limiting those who can exhibit massive relevant project experience. A person with 20 relevant projects can't demonstrate that they are more qualified than a person that shows his only 5 projects.

- What are you expecting as photo attachments? 8-1/2X11" slick glossy color photos one high-quality paper stock? Will there need to be a page number on each photo... in which case they must be individually printed for EACH submission of a SF330, since page number will change with each submission. This could cause additional expense for the A/E firms.

- Should there be a standard "title block" tying each picture back to the Section F?

- Will photo pages be page-limited? (i.e., one photo per project, versus one photo PAGE per project, versus no limits?)

- Page 10 - Section F has been changed to read "Present 10 projects." If you do not have a full ten projects would this be an automatic disqualifier? The old 255 form read "Present up to 10 projects."

- Page 10 – Item 27 - Project Owner: This is a very interesting question and I would think the GSA if any organization would be cognizant of the difference in owner vs. user etc. Sometimes, it is better to have the USER as a contact. Sometimes the owner is different from the entity responsible for the design and construction which in turn is different from the entity who will be maintaining and using it. There's no flexibility for additional contacts or for contacts from the various people. Would you rather have someone who, from the Contracting point of view was excellent but whose work fell apart a year after the warranty period expired?

- Requiring a fax number is additionally labor intensive. E-mail addresses (if available) and telephone should be adequate.

- Page 10 – Item 33 – Additional Project Information: What else could possibly be included that would fit in this small space???

- Page 11 - How detrimental is not having the proposed team members' work on the firm projects listed? If this is a highly valued criterion, you may swing firms to only use principal or senior level staff. This

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practice could prove to be more costly for the government, was this anticipated? Most of the procurement announcements and regulations state that the Government encourages contracts with new businesses. It appears that the project lists in Section E (which require names of people who have been involved in specific projects) is discriminatory toward new businesses. Was it the intention of the Government to prevent new businesses from getting contracts with them? In other words, if you have a new business with very experienced professionals, who happen to have experience in a different city, or area and therefore have no experience with local subconsultants or prime consultants, how is the government going to handle this issue?

COMMENTS ON PART 2 – GENERAL QUALIFICATIONS:

- Regarding the note at top of form… "(If a firm has branch offices, complete for each specific branch office seeking work.)" If the solicitation is for a term contract (IDC or ID/IQ type) contract on a statewide or regional basis… firms may have to attach multiple Part II responses for offices in other cities and/or states.

- Block 5.b: The NAICS codes do not refer to Small Business Status, they are the replacement for SIC codes. If you want to know whether or not the business is Small, Small disadvantaged, Hub-Zone, etc., you should correct the General Instructions on Page 4.

- In the Block 7, it references a Block 3A that is not on the form.

- Block 10: Limiting us to only 20 Profile Codes will be VERY hard for multi-discipline firms. Cutting down to our top 30 for the annual SF254 submission was tough enough… this will be *GRUESOME*!

- Block 10.c: Profile codes and revenue: For projects that include multiple profile codes, how does the Government wish us to show these? If, for example, the project is a Rehab (R06) of a School (E02) in the Arctic (A07)… should we show the entire amount under each of the three profile codes? A/E firms have had this same quandary since 1975 when completing SF254. Since there is no way to accurately separate out how much of the construction value is for Rehab versus Educational spaces… we have been showing the full dollar amount in BOTH profile codes. If we change our databases to only show ONE Profile code… then we aren't being given credit for our experience in the other area.

- Why are you asking for the DUNS number, instead of some other Government identifier? We are required to obtain ACASS, CAGE, CCR, TIN and NAICS codes from the Government… and the only one you ask for is a private industry identifier…

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Marketing Associates of Spokane – membership responses.... Received from our Associates in Spokane, WA

I don't like the change in the Profile Codes, as I have put profile codes w/ projects in my data base.

I share the concerns of:

Having the government making this form available electronically and capable of merging w/ a data base (i.e.. Access) as well as if we are able to alter it.

Too small of form/boxes to present information. Hence too small of font to get stuff in there, or stuff will have to be left out.

Other than my total agreement w/ these items of theirs (and the rest of the list too!) I have no new complaints/concerns to voice.

Thank you for the review.

Kim Jeffries, Admin./Mktg.Secretary
Architects West, Inc.
210 E. Lakeside Avenue, Coeur d'Alene, ID 83814
Ph: (208) 667-9402 Fx: (208) 667-6103

I think the Alaska group has raised some valid concerns that I share. I will spend a little more time with them but so far I have nothing to add. Happy New Year if I don't talk to you between now and then.

Julie Culver
Riley Engineering
Spokane, WA

Potential Problems:

Part I:

1 & 2 (page numbering)– Currently the prime typically gathers completed 254's and 255's from their consultants, collates the package and sends one team proposal. If each firm's Part I is signed and sequentially numbered then each team firm has to know the exact number of sheets they are submitting early in the process. For instance: hypothesize that the structural firm is asked to number their sheets starting with #8 and that there are 20 sheets total. They print and sign their information and send it to the prime. If at the last minute a new consultant is added, the entire rest of the team's information is incorrect, there are now multiple new pages, possibly in the middle of the proposal. The prime would need to have electronic files and signatures for each of the firms to be able to correct the numbers and reprint. This doesn't save time or money.

E. Resumes - question 16. This space is very small to describe someone who might do – cost estimating, specifications, project management, and construction management all on the same project. There does not appear to be a forum for an employee's work with a past employer to be used or emphasized. Individuals are hired for what they bring to the firm but then that

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information seems inadmissible in this format. Can their 5 relevant projects be with another firm?

The information required for firms with branches seems repetitive and exhaustive.

F. Example Projects – General Service contracts typically have multiple locations that cannot be written within this space.

G. Key Personnel – I agree with a previous concern that this section could cause firms to only submit Principals and retained employees resumes for specific project personnel. New or younger employees will not be used because the completed matrix would then appear empty. Additionally, clients may believe that only Principals and long-term employees will be working on their projects, obviously the perpetuation of the industry requires that younger employees work on projects. This matrix may also look more favorable for older, larger firms. These firms simply have more principals and long-term employees to list, thus a more full matrix.

In general the allowed fields are very small for the information requested. The respondent text will either be very small or incomplete.

The degree to which individual agencies or those requesting the SF330 can tweak their request seems significant. Part of the work/paperwork burden of the 254's and 255's is that each entity wants something a little different, photos, no photos, page limitations etcetera. Therefore each "standard" form is tweaked and individualized for that proposal. This also leaves the information open to "fudging." Twists can be put on the information to look more favorable to each selection group.

Cross referencing the photos as attachments could cause problems. If you attach a photo for each individual persons 5 listed projects and have 5 submitted resumes that is 25 pictures. Then if a firm submits 10 projects and each has a photo that is a total of 35 pictures. Where do all of these pictures go and if you have repeat pictures do you only submit it once and let the reviewer search for the picture by the project name?

Generally there does not appear to be any major advantages in time or money with the SF330 over the 254's and 255's. What about trying an approach that is used by many entities around the country, a database? We are a fortunate society that has wonderful technological capabilities available to us so lets use them. Most firms have established databases of their projects that contain most of the information requested in the SF330. Could the government create a database that each firm updates each year or quarter and use that for an initial selection cut in their process? Imagine this scenario: a government agency needs a consultant team so they submit an RFQ. A & E firms respond with a simple letter of interest. This list of interested firms is then searched by the requesting agency. The agencies set of criteria is used to select an appointed number of firms to either submit proposals or interviews. Essentially, only 5-6 firms burden the expense of submitting a proposal rather than 12 or 15. If the "typical" information is only submitted once or twice a year it removes the burden of reproducing the same information over and over. As a prime firm we create 2-4 proposals a month, if each SF330 takes 29 hours and you submit an average of 3 proposals/month that is 87 hours of work/month. That would require a part time person to submit proposals, and only the projects your firm is awarded pays this individuals salary. This is a larger burden on small firms. It would also eliminate the opportunities to "fudge" and "twist" information. Firms with greater resources can typically dedicate more time and money to "dressing up" proposals. There are different ways of selecting A & E firms besides the 254's and 255's or these forms disguised in vertical format. An

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electronic fil ng database may be the best way to truly reduce the work/paperwork burden of the A & E select on process.

3E Design G:oup P.S. - Spokane

— END —