GAO

United States General Accounting Office
Washington, DC 20548

Office of
General Counsel

In Reply
Refer to: B-198809
B-199575

October 9, 1980

Philip G. Read
Director, Federal Procurement
Regulations Directorate
General Services Administration

Dear Mr. Read: F.P.M.]

You have requested our [comments on a proposed amend-
ment to Subchapter F of the Federal Property Management
Regulations (FPMR) (Part 101-36). The proposed amendment
provides for standard terminology to be used in solici-
tation documents regarding the application of Federal
Information Processing Standards Publication (FIPS PUB)
71 and Federal Standard (FED-STD) 1003. We are opposed
to the amendment.

Under the terms of the proposed amendment, the pro-
cedures specified by FIPS PUB 71 or FED-STD 1003 are
required to be used in the design and procurement of all
data communications and automatic data processing (ADP)
systems, equipment and services using bit-oriented syn-
chronous data link control procedures or employed in
computer networking or teleprocessing environments using
bit-oriented data communications. When an agency deter-
mines that interoperability with National Communications
System (NCS) facilities is required, FED-STD 1003 estab-
lished by the General Services Administration (GSA) is
applicable. When no requirement for interoperation with
NCS facilities exists, FIPS PUB 71 established by the
National Bureau of Standards (NBS) is applicable.

We believe that there should be one uniform standard
for Advance Data Communication Control Procedures (ADCCP).
Although both FIPS PUB 71 and FED-STD 1003 adopt, in part,
the American National Standards Institute's standard for
ADCCP (X3.66-1979), there are significant differences
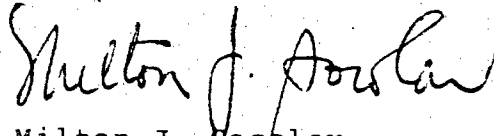between FIPS PUB 71 and FED-STD 1003. Accordingly, we

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do not believe that the proposed amendment should be issued at this time, and recommend that GSA and NBS work together to establish a uniform standard for ADCCP.

Sincerely yours,

Milton J. Socolar
General Counsel