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United States General Accounting Office
Washington, DC 20548

Office of
General Counsel

In Reply
Refer to:

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Mr. Phillip G. Ford, Director
Federal Procurement Regulations
Directorate
Office of Acquisition Policy
General Services Administration

Dear Mr. Ford:

You requested our comments on proposed amendments to
FPR part 101-36, APP Management, and FPR 1-4.1108-5,
standard clauses for implementation of FIPS PUBS.

The proposed amendment to FPR part 101-36 provides
standard terminology to be used in solicitation documents
when compliance with Federal Information Processing Standards
Publications (FIPS PUBS) 60, 61, 62 and 63 is required.
The proposed amendment also adds FIPS 66 to the list of
approved FIPS PUBS dealing with the interchange of machine
processable data between and among agencies.

The proposed amendment to FPR 1-4.1108-5, adds a new
subsection (c) which requires agencies to determine whether
a substantial change in the Government's requirements has
occurred when a waiver to a FIPS PUBS has been granted after
the release of the solicitation and requires action in
accordance with FPR 1-3.005-1(d) if appropriate.

We are in favor of the amendments as proposed.

Sincerely yours,

MILTON SOCOLAR

Milton J. Socolar
General Counsel

