



October 29, 2010

Ms. Hada Flowers
Regulatory Secretariat (MVCB)
General Services Administration
1800 F Street, N.W., Room 4041
Washington, D.C. 20405

Subject: FAR Case 2009-023, Unique Procurement Instrument Identifiers (PIID)

Dear Ms. Flowers:

The Aerospace Industries Association (AIA) appreciates the opportunity to provide comments and recommendations on the proposed rule "Unique Procurement Instrument Identifiers (PIID)" published in the *Federal Register* on August 17, 2010 (75 F.R. 50731). The proposed rule (FAR Case 2009-023) would amend the Federal Acquisition Regulation (FAR) to standardize use of PIIDs throughout the Government. It also defines the requirement for agency-unique procurement instrument identifiers and extends the requirement for using PIIDs to all solicitations, contracts, and related procurement instruments across the Federal Government.

Our primary concern is that in implementing any new numbering scheme, the Council needs to allow for a long implementation period. Contractor (and Government) IT systems may have contract and order number fields that are character limited (much as we experienced with the Y2K issue). It takes time to identify and implement system fixes.

We would suggest that once a final rule implementing a new contract and order numbering system is issued, a 2 year phase-in period should be provided in order to allow all IT systems changes to be put in place.

On behalf of its member companies, AIA thanks you for the opportunity to provide these comments and welcomes an opportunity to discuss them further with you. If you have any questions or need any additional information, please contact me at (703) 358-1045 or richard.sylvester@aia-aerospace.org

Sincerely,

A handwritten signature in black ink that reads 'Richard K. Sylvester'.

Richard K. Sylvester
Vice President, Acquisition Policy