United States General Accounting Office Washington, D.C. 20548

Office of the General Counsel

B-232203; B-232205; B-232206

October 19, 1988

Margaret A. Willis FAR Secretariat General Services Administration

Dear Ms. Willis:

This responds to your request for our comments on proposals to amend the Federal Acquisition Regulation (FAR) with respect to: Standard Form (SF) 255, "Architect-Engineer and Related Services Questionnaire for Specific Project"; reports of contractor shipments; and plant clearance policies regarding contractor and subcontractor inventories of government property no longer needed for contract performance. These are FAR Case Nos. 87-21, 88-29 and 88-30.

SF 255 (FAR Case No. 87-21)

The proposed rule would basically change the present form (FAR § 53.301-255) to provide space for interested Architect-Engineering firms to enter information on the number and discipline of consultant personnel they propose to use on a specific project to eliminate the necessity for collecting such information later.

Reports of Contractor Shipments (FAR Case No. 88-29)

The proposed rule would amend FAR § 42.1406-1 to require advance notice by contractors of minimum carload or truckload shipments, and of shipments containing classified, sensitive, controlled, explosive or other specified hazardous materials. It would also add a contract clause, FAR § 52.242-12, to implement these changes.

Plant Clearance Policies (FAR Case No. 88-30)

The proposed rule would basically amend FAR Subpart 45.6 to: (1) require contractors taking inventory of government property which is in their possession and no longer needed

for contract performance to specifically identify hazardous and contaminated materials; (2) further specify the responsibility for paying various costs associated with the transfer of government property in the contractor's possession to another government agency; (3) make technical corrections to the prescribed reporting form for contractorheld government property; and, (4), clarify the policy regarding the inventory of government property in the possession of subcontractors.

We have no objection to the proposed changes.

Sincerely yours,

James F. Hinchman General Counsel