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June 24, 2026

VIA ELECTRONIC SUBMISSION

William F. Clark
Director,
Office of Governmentwide Acquisition Policy
U.S. General Services Administration
1800 F St. NW
Washington, DC 20405

RE: Request for Extension of Comment Period for FAR Case 2026-001, FAR Case 2026-002, FAR Case 2026-005, and FAR Case 2026-007. (Docket No. FAR-2026-0001, Docket No. FAR-2026-0002, Docket No. FAR-2026-0005, and Docket No. FAR-2026-0007)

Dear Director Clark:

Gov Contract Pros (hereinafter "GCP") respectfully submits this letter to request an extension of the comment period for the Federal Acquisition Regulatory Council's (hereinafter "FAR Council") four (4) proposed rules on the Revolutionary Federal Acquisition Regulation ("FAR") Overhaul ("RFO"). The four (4) proposed rules include FAR Case 2026-001, FAR Case 2026-002, FAR Case 2026-005, and FAR Case 2026-007. (Docket No. FAR-2026-0001, Docket No. FAR-2026-0002, Docket No. FAR-2026-0005, and Docket No. FAR-2026-0007).

I. Background

On June 23, 2026, the FAR Council comprised by members of the Department of Defense ("DoD"), the General Services Administration ("GSA"), the National Aeronautics and Space Administration ("NASA"), the Office of Federal Procurement Policy ("OFPP") published four (4) proposed out of an anticipated twelve (12) proposed rules of the RFO in the Federal Register.

These proposed rules are: FAR Case 2026-001, which presents changes to Parts 1, 2, 4, 33, 39, 40, and 53; FAR Case 2026-002, which presents changes to Parts 6, 7, 10, 18, 26, 37, and 41; FAR Case 2026-007, which presents changes to Parts 3, 49, and 52; and FAR Case 2026-005, which presents changes to Parts 5, 24, 29, and 52. These proposed rules impact hundreds of billions of acquisition dollars, tens of thousands of federal civil servants, and tens of thousands of federal contractors.

These four (4) rule makings together make up 214 pages in the Federal Register, currently pages 37550 - 37764. To provide substantive comments for these rules, at present interested parties must review the "un-deviated" FAR, which is well over 2,000 pages on acquisition.gov, the Model Deviations which are over 1,600 pages on acquisition.gov, along with the Model Deviation's practitioner albums, the FAR

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Companion Version 2.0, the Category Management Guide, and the "You Said, We Did" sections of the RFO site on acquisition.gov. Further, each interested party may compare the current clauses that their contracts are subject to as agencies have slowly implemented disparate aspects of the RFO Model Deviations on contracts. While we have summarized the page accounts above, the impact of these proposed rules merits maximum public engagement. Indeed, federal agencies issued class deviations to the FAR pursuant to FAR Subpart 1.4, requiring the federal acquisition system and defense industrial base to operate under a new and "revolutionary" set of procurement changes; and now those class deviations will presumably be further amended pursuant to this rule making. In sum, recognizing the "revolutionary" nature and quantity of changes made through the RFO process, interested parties' ability to meaningfully participate in the rulemaking process and present their views is not possible given only thirty (30) days to do so.

II. GCP Recommends Extending the Public Comment Period to 60 Days or 90 Days.

The RFO text only shows the proposed new rules and leaves it to interested parties to identify, evaluate, understand, and comment on what has changed within the existing text, which itself may be construed as the FAR as it is currently available in the Federal Register or the FAR deviated by class deviations on an agency-by-agency basis as it exists on acquisition.gov. The proposed rules do not provide economic estimations for the impact of these rules will have under the Regulatory Impact Analysis or Regulatory Flexibility Analysis. These proposed rules do not estimate the amount of time it will take contractors to familiarize themselves with these new requirements. Further, these proposed rules do not contain any estimates of benefits for the government or contractors even though the rules state the RFO will increase the timely acquisition and delivery, lower cost and accountability in all spending, and increase competition. If the government wants accurate information on how these "revolutionary" rules will impact the federal contractor community, it is advised that the FAR Council give adequate time for the industry to provide their insight.

GCP respectfully requests, on behalf of all interested parties and in particular the dozens of small businesses that we service in the federal marketplace, that the FAR Council exert its discretion and extend the comment period for these four (4) proposed rule makings to be sixty (60) days at minimum, or ideally ninety (90) days in total. This would result in public comments being closed on August 22, 2026 or September 21, 2026. Given the "revolutionary" impact this will have on contracting, the public should be permitted adequate time to review the proposed rules so that unintended consequences from the RFO may be pointed out before finalizing these changes. Furthermore, the proposed changes are being made at the busiest time of the year in the federal market for both government and industry, i.e., the end of the fiscal year. Both parties are already extending maximum practicable efforts to service existing agency needs, without the additional pressures of evaluating and responding to these proposed changes.

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Given there are changes beyond the Model Deviations, the regulations as proposed do not specifically go line-by-line to show what has been removed from existing regulations, again without acknowledging either the FAR in the Federal Register or the agency-by-agency class deviations; merely showing what will replace the entirety of the FAR. The FAR Council is asking for an extraordinary amount of research for the public to properly comment on these proposals.

If the FAR Council is seeking public information about the impacts of these rule makings, it is essential to permit interested parties, in particular small businesses, time to review and respond with estimations of the impact this will have when managing contracts with the federal government.

Given the intertwined nature of these four proposed rules, GCP respectfully submits this comment letter in each of the four proposed rule dockets and requests this comment period be extended for FAR Case 2026-001, FAR Case 2026-002, FAR Case 2026-005, and FAR Case 2026-007.

III. Conclusion

Providing sufficient time for the public to review and provide meaningful comments is not merely a matter of good policy, but an essential mechanism to ensure these revolutionary proposed rules do not have unintended impacts. Given the complexity and revolutionary nature of this proposal, GCP urges the FAR Council to provide a sixty (60) day or ninety (90) day comment period in order to allow interested parties, in particular small businesses, the time they need to evaluate the impact this rule may have on their contracts, business practices, reporting obligations, systems, finances, and other material considerations and notice unintended consequences. Given this rulemaking process has already taken over a year to get this far, the public should be able to meaningfully engage with these proposals.

Sincerely,

Trevor Skelly
CEO
GovContractPros, LLC