



NATIONAL ASSOCIATION OF SURETY BOND PRODUCERS

1140 19th Street, NW, Suite 800

Washington, DC 20036

Tel: 202.686.3700

Fax: 202.686.3656

www.nasbp.org

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Sent via email to: Lisa.Austin@gsa.gov; Cecelia.davis@gsa.gov and Nathan.Schelble@mail.house.gov

Ms. Lisa A. Austin
Associate Administrator
U.S General Services Administration (GSA)
GSA Office of Congressional and Intergovernmental Affairs
1800 F Street, NW
Washington, DC 20405-002

Re: Standard Forms 24, 25, 25A, 34 and 35

Dear Ms. Austin:

Thank you for your letter of June 8, 2014 in which you respond to inquiries posed by Representative Michelle Lujan Grisham in correspondence dated June 3, 2014 and by me in correspondence dated August 21, 2012. The National Association of Surety Bond Producers (NASBP) appreciates your willingness to bring the matter of permitting identification of "limited liability company" in standard forms to the attention of the FAR Council for its review and consideration. Limited liability companies increasingly are desired entities for construction companies, so recognition of limited liability companies as a type of organization in the Federal Acquisition Regulation (FAR) is warranted. Such recognition in the FAR will ameliorate the current confusion by businesses formed as limited liability companies on what form of organization to identify on standard forms.

It also has been reported to NASBP that federal contracting agencies have differed in their views on what is the proper organizational identifier to select on standard forms when the business is a limited liability company. This has caused needless delays and rejections of submitted forms.

NASBP would appreciate being kept apprised of the FAR Council's deliberations on this matter. We understand that any change in the FAR will require the requisite procedures, including notice and comment.

Thank you again for your response and for your thoughtful consideration. If you have any questions, please feel free to contact me at 202-686-3700 or at mmccallum@nasbp.org.

Yours sincerely,

Mark H. McCallum
Chief Executive Officer

cc: The Honorable Michelle Lujan Grisham
Cecelia L. Davis