

October 23, 2018

Ms. Stacy Lowe
Contracting Officer
Office of IT Schedule 70 Contract Operations
General Services Administration
1800 F Street, NW
Washington, D.C. 20006

RE: IT Schedule 70 RFI Response re: Software SINs

Dear Ms. Lowe:

On behalf of our member companies, the Professional Services Council (PSC) respectfully submits the enclosed response to the General Services Administration's (GSA's) September 24, 2018 *Request for Information on Proposed Changes to IT Schedule 70's Cloud Special Item Numbers (SIN) (132-40)*.

PSC is the voice of the government technology and professional services industry. Our member companies represent small, medium, and large businesses that provide federal agencies and the military with services of all kinds, including information technology (IT) and cloud computing services.

PSC supports GSA's overall goal of updating the Cloud SIN in order to "enhance the ability of vendors and the Government to more efficiently provide and acquire Cloud applications and supporting services as a solution." The commercial technology marketplace increasingly uses consumption-based or "pay as you go" buying, which private organizations can more effectively leverage than government to take advantage of the flexibility and scalability of cloud computing.

Attached are our more detailed comments and recommendations. PSC would welcome the opportunity to provide additional details to GSA at your convenience. Should you have any questions, please feel free to contact me at chvotkin@pscouncil.org or Kevin Cummins, PSC Vice President Technology, at cummins@pscouncil.org.

Sincerely,



Alan Chvotkin
Executive Vice President and Counsel

encl: PSC Response to GSA Request for Information on Proposed Changes to IT Schedule 70's Cloud
Special Item Numbers (SIN) (132-40)

PSC Response to GSA Request for Information on Proposed Changes to IT Schedule 70's Cloud Special Item Numbers (SIN) (132-40)

1. For overall Cloud Services, can they be developed and or modified in order to offer to customers that are OCONUS (Outside Continental United States) via GSA Schedule 70? If not, what are the issues that would prevent it from being offered?

Contractors should be able to develop and modify cloud services that have an authorization to operate (with applicable restrictions such as foreign data access) for US government customers located OCONUS. The only question is whether the scope of Schedule 70 permits purchase or use OCONUS.

2. For Cloud Services (i.e. IaaS, etc.), is there anything in the proposed language that would impede the Government's desire to gain access to Cloud products?

No PSC response.

3. For Cloud Services (i.e. IaaS, etc.), is there a more precise way to describe the minimal increment of the "metered services" requirement to reflect the Government's desire to gain the benefit of "pay as you go" consumption? How is the "pay-as-you-go" model currently structured with regard to price? Is there an alternative approach that would be more effective?

GSA should continue to rely on existing NIST definitions and, when appropriate, consider working with NIST on additional technical standards for minimal increments of metered services that would help agencies compare similar offerings from different vendors. However, given the fast pace of innovation, GSA should also consider increments and measures used in the commercial marketplace.

Services in each category (IaaS, PaaS, SaaS) currently have standard descriptions within the GSA BPA definitions for increments that can be purchased. Elements within each as-a-service categories can be slightly different. For example, storage units are generally measured by the GB per month whereas operating systems (OS) are measured by the hour or month based on CPU and RAM. Many vendors have introduced their products to the on-demand marketplace as an "as-a-service" item, often with pricing models that closely follow their non-cloud unit pricing (e.g., by the user, GB, OS, transactions, etc.).

In terms of consumption-based buying, the SIN description should allow for flexible arrangements measuring short time periods, surges or spikes in demand, etc. to achieve the benefit of flexible and elastic resourcing from cloud computing. However, such metering need

not correspond directly to the billing period. More incremental usage metering can help agencies meet the “spirit of pay as you go” while the service is purchased on a less frequent (such as monthly or yearly) basis.

4. For Cloud Services (i.e. IaaS, etc.), if there are instances when Cloud products cannot meet the requirement of frequent incremental billing because they require annual fees, are there any examples when these products could not be considered Term Licenses (132-32)?

The RFI states that “[t]he proposed updated language of the SIN description now requires a ‘minimal pay as you go unit of measurement, appropriate to the service.’ In the case of SaaS products, this is no more than one month per one user or some other equivalent discrete measurement that provides the Government with frequent metering cycles.”

To preserve agencies’ ability to acquire the broadest possible range of SaaS products, the updated SIN language should instead allow purchasing software offered at a flat rate, on an annual or semi-annual basis, or other term license arrangements. While the updated SIN language does not specifically exclude access to SaaS solutions via a cloud service provider’s marketplace software listing or bring your own license (BYOL) arrangement, GSA should be aware that commercial cloud customers increasingly access software in this manner.

Moreover, as noted in our response to Question 3, using incremental service metering for cloud services need not preclude purchasing or invoicing those services on a monthly, yearly or other basis.

5. For Cloud-Related IT Professional Services, are there any particular services that are relevant for supporting the Government’s migration and adoption of Cloud products that should be added to the list of eligible services?

There are additional cloud-related IT professional services that are relevant to supporting cloud migration and adoption not explicitly included in the list of eligible professional services. However, the proposed language defining “Cloud-Related IT Professional Services” does appear to contemplate additional eligible services directly related to cloud migration and adoption.

6. For Cloud-Related IT Professional Services, is there a better way to describe the services that the Government seeks to support its desire to find specific expertise related to Cloud deployments?

Professional services could also be aligned to the specific product or service being purchased. This includes training, setup and integration, product upgrades, as well as customizations.

7. For Cloud-Related IT Professional Services, is there anything in the proposed language that would inhibit contractors or impede the Government's access to providers of Cloud related services? Would the services have to meet FISMA requirements?

No, the proposed language does not inhibit contractors or impede the Government's access to providers of services. However, PSC does recommend adding eligible services as described in our response to question 5.

FISMA imposes requirements on agencies to provide information security for the information and information systems that support the operations and assets of the agency, including those provided or managed by a contractor. Therefore, contractors must be able to support agencies in meeting FISMA requirements for cloud-related IT systems, including by providing personnel that meet applicable security requirements. However, cloud-related IT professional services, in and of themselves, are not necessarily subject to FISMA requirements.