**ACQUISITION AND
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Mr. Karl G. Harr, Jr.
Aerospace Industries Association
 of America, Inc.
Office of the President
1725 DeSales Street, N.W.
Washington, D.C. 20036

Dear Mr. Harr:

In your 20 December 1985 letter, you requested a 15 day extension on behalf of the Aerospace Industries in order to comment on recently published proposed revisions to FAR Subpart 31.2. Although Colonel Guenther, the Director of the DAR Council, has already responded verbally to Mr. Hal Scheller on 2 January, this answer confirms their previous conversation.

As you fully realize, and as Colonel Guenther has reiterated, the Congress has put DoD under a severe time constraint in order to implement Section 911 of the 1986 DoD Authorization Act. Both the DAR and CAA Councils, as well as the Cost Principles Committee and supporting staff, have taken extraordinary measures in order to develop the proposed coverage to meet the statutory time deadlines. We made a conscious decision to put this coverage in the FAR rather than the DFARS and to solicit as many public comments as possible before final rule. Even with the present 30 day public comment period it is envisioned that the councils will be pushed to complete their work on time. I fully appreciate your concern and desire to provide meaningful industry comments; however, due to the critical constraints that have been levied in the law upon us, we trust you fully understand why extending the public comment period is not possible. We consider public comments an important part of the regulatory process and hope you will be able to express your industry concerns to us.

Thank you for your concern and continued interest.

Signed
ELEANOR R. SPECTOR
DEPUTY ASSISTANT SECRETARY OF
DEFENSE PROCUREMENT

COORDINATION SHEET

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