

September 16, 2019

Mr. Simon Kinneen, Chairman
North Pacific Fisheries Management Council
605 W. 4th Ave., Suite 306
Anchorage, AK 99501-2252

RE: **Comments on Agenda Item C-2 – Observer Fee**

Dear Chairman Kinneen:

The following comments are on behalf of the members of the Fishing Vessel Owners' Association (FVOA) and the Deep Sea Fishermen's Union (DSFU). The Association is a trade association comprised of 95 vessel owners and halibut/sablefish IFQ holders. The crews of the DSFU work on FVOA vessels under a negotiated contract. All the members of FVOA and DSFU operate in the halibut and sablefish fisheries off Alaska and pay landing fees in order to fund the partial coverage observer program. The fees are paid from the gross revenues of a fishing trip, collected by our shorebased processors who pay half of the overall fees.

The total fees collected by the National Marine Fisheries Service for partial observer coverage have been between 3.6 and 4.7 million dollars annually. Sixty-five percent of these fees have come from halibut and sablefish fishermen and processors.

The Council adopted, for public review, in June 2010, the draft EIS to restructure the observer program. The Council used this analysis to develop the current partial coverage observer program by amendments 86 and 76, respectively, of the Bering Sea and Gulf of Alaska FMPs. The 2010 EIS provided detailed daily costs gathered from the different observer providers at that time. At the time of Council actions, the EIS estimated the daily cost per day for an observer in a range from \$366 to \$467.

The base cost of \$366/day was generated from the 100% coverage vessels and at-sea processors. Subsequently, the EIS authors estimated the partial coverage daily cost to be \$467.

“Estimated Daily Cost of Observers for 100% Vessels and Processors under Alternative 1 (status quo)”

The only difference between the current, pay-as-you-go (status quo) daily cost of observers for 100% vessels and processors in the BSAI and the daily fee proposed under Alternative 4, would be the added observer wage and benefits imposed under a direct government contract. Therefore, the daily cost of an observer day for purposes of evaluating Alternative 1 could be estimated as follows.

Assumptions

Average daily fee per observer currently paid by 100% vessels and plants: \$323

Average cost of one round trip airfare between Seattle and Dutch Harbor: \$1,957

Average cost per observer for occasional miscellaneous costs other than airfare: \$452

Average number of travel/port days per observer, charged at the daily fee: 2

Calculations

Step 1: Roundtrip airfare between Seattle and Dutch Harbor = \$1,957

Average cost per observer for occasional misc. charges = \$452

Total average cost of airfare and misc. chargers per observer: \$2,409

Step 2: \$2,409 x 656 observers per year = \$1,580,304

Step 3: \$1,580,304 ÷ 36,992 observer days per year = \$42.72/day

Step 4: Daily Costs = Average daily fee + daily cost of airfare and misc. charges

Average Daily Fee: \$323.00

Daily cost of airfare and misc. charges: \$42.72

Total estimated daily cost for 100% BSAI vessels/processors under Alternative 1: \$365.72”

The Council’s final action in adopting the amendments that establish the partial coverage observer program assumed these daily costs and a resulting 30% observe coverage. These projections, however, never materialized once the program was approved and implemented. The resulting contract to provide observer coverage resulted in a sole source five-year contract. The resulting costs were as follows in Table 5. The daily cost of an observer ranged from 191% to 295% in excess of the Council’s original cost estimates for this program from 2014 through 2018.

Table 5 Average annual observer coverage sea day costs from 2014 to 2018.

Year	Funds expended	Number of observer sea days realized	Average sea day cost
2014	\$4,937,414	4,573	\$1,080
2015	\$5,758,268	5,318	\$1,083
2016	\$4,186,303	4,677	\$895
2017	\$3,146,111	2,749	\$1,144
2018	\$4,425,144	3,207	\$1,380
5-year	\$22,453,240	20,524	\$1,094

Source: 2018 Annual Report

The resulting coverage rates from 2013 to 2019 overall are all well below the original predictions of the 2010 EIS of 30% or better. Coverage rates for the principal trawl and hook and line fisheries have been in the 14 to 20 percent range in most years.

Table 3 Summary of partial coverage budget, strata and coverage allocation scheme 2013 through 2019 and fees collected and realized observer coverage rates for the years 2013 through 2018.

Year	Partial Coverage Budget (Millions)	Fees from Previous Year	Realized Costs (Millions)	# Observer Days Realized	Allocation Scheme	Strata	Effort (# of Trips)	# of Trips Monitored (Observer or EM)	Coverage rates Achieved ¹
2013	\$4.5	0	\$3.8	3,538	Equal allocation	Trip Selection	3,977	590	14.8%
						Vessel Selection	2,249	154	10.6%
						Zero Coverage	3,040	0	0.0%
2014	\$4.8	\$4.2	\$4.9	4,573	Equal Allocation	Trip Selection	4,390	662	15.1%
						Vessel Selection	2,079	324	15.6%
						Zero Coverage	2,320	0	0.0%
2015	\$5.5	\$3.4	\$5.8	5,318	Small vessel 12% and remaining available days on large vessels	Large Vessel (≥57.5 ft)	4,676	1,094	23.4%
						Small Vessel (40-57.5 ft)	2,148	241	11.2%
						EM Pre-Implementation	92	2	2.2%
						Zero Coverage	2,001	0	0.0%
2016	\$4.5	\$3.7	\$4.2	4,677	Optimized allocation (retained and discarded groundfish)	Trawl	2,738	767	28.0%
						Hook and Line	2,655	398	15.0%
						Pot	1,261	185	14.7%
						Zero Coverage	2,109	0	0.0%
						EM Pre-Implementation	227	76	57.1%
2017	\$3.6	\$3.7	\$3.1	2,749	Optimized allocation (discarded groundfish)	Trawl	2,090	433	20.7%
						Tender Trawl	69	13	18.8%
						Hook and Line	2,298	279	12.0%
						Tender Hook and Line	4	0	0.0%
						Pot	932	72	7.7%
						Tender pot	75	4	5.3%
						Zero Coverage	2,058	0	0.0%
						EM Pre-Implementation	683	142	20.8%
2018	\$5.5	\$3.8	\$4.4	3,207	15% Hurdle plus Optimized (discarded groundfish, Chinook and halibut PSC)	Trawl	1,864	378	20.3%
						Tender Trawl	40	14	35.0%
						Hook and Line	1,990	309	15.5%
						Pot	626	97	12.7%
						Tender Pot	31	9	29.0%
						EM Hook and Line	767	174	22.7%
						EM Pot	164	42	25.2%
						Zero Coverage	1,748	0	0.0%
2019	\$4.5	\$3.2	n/a	n/a	15% Hurdle plus Optimized (discarded groundfish, Chinook and halibut PSC)	Trawl			24%
						Tender Trawl			27%
						Hook and Line			18%
						Pot			15%
						Tender Pot			16%
						EM Hook and Line			30%
						Zero Coverage			0%

Source: Observer Program Annual Reports 2013 through 2018 and 2013 through 2019 Annual Deployment Plan.

¹ Vessel selection coverage rates in 2013 and 2014 are expressed as a percentage of vessels monitored rather than a percentage of trips monitored. 2019 coverage rates are the estimated rates set in the 2019 Annual Deployment Plan.

² This total includes years after the initial implementation year funded by Federal start-up money.

The inability of the partial coverage observer program to attract competitive bidding has resulted in observer daily cost from 2013 through 2019 being far in excess of what the original EIS projected and coverage levels not being achieved for the principal core fleets of trawl and hook and line.

The current "Adjusted Partial Coverage Observer Fee" EIS, September 2019 projects five budget scenarios based on different percentage fees ranging from 1.0 to 2.0 percent. The daily cost (new) ranges from \$1,648.12 to \$1,302.23 per day. (See Table 13 below.) None of these cost-budget scenarios are based on 2019 daily observer rates charged by companies such as Alaskan Observers, Saltwater, MRAG, or Tech Sea International. **All of the cost projections of the 2019 EIS are based on the current contracted prices negotiated by NMFS/NOAA from a sole source observer provider. None of the cost scenarios are based on existing competitive market rates by existing observer companies.** The FVOA AND THE DSFU have researched a variety of current observer daily costs from fishing companies and agencies. Those costs are as follows:

- Freezer LL 100% coverage - \$341/day plus travel averaging at about \$415/day;
- Pollock catcher vessel shoreside delivery – \$340/day plus travel and housing, usually running \$420-\$440 per day;
- Amendment 80 vessels – \$350/day plus cost of travel and housing, usually running \$420-\$440 day;
- Catcher longline/pot in the Pacific Council trawl ITQ program, i.e. gear switching for sablefish - \$530 per day;
- St. of Alaska Crab observer - \$341/per day;
- **The NPFMC Advisory Panel discussion, April 2019 – It was noticed by a trawl representative on the Council's AP that when his vessel participates in the 100% coverage he is charged \$550-\$600/day from the same company that has the contract with the NMFS partial coverage program; however, when he participates in the partial coverage fleet, that same company receives \$1380/day for observer services from NMFS.**

It is unacceptable to the members of FVOA AND DSFU that the Council's EIS only presumes coverage costs and fees should be based on what appears to be bloated daily charges from a sole source observer company. There needs to be a serious discussion as to why NMFS/NOAA negotiated rates are so far off from other market rates. The Council's Observer Committee has pursued this question several times and the answer is vague and usually blames existing contract authorization rules and procedures. The vessel owners, crews and shoreside processors that pay for this observer program should not be penalized for the failure of NMFS/NOAA to contract a daily observer cost in line with the current market. The daily cost rates used in the 2019 EIS have no relation to existing market rates. If the Council accepts this, then the Council is capitulating to a sole source contract rate as the best that can be done. A contract procedure that is characterized by the multiple complications has been identified as a reason other observer companies are not interested in submitting bids.

Table 13 Observer budgets, observer fee percentage, cost per day, and days purchased under 2019 budget scenarios. Resulting strata-specific selection rates (via the 15% baseline + optimization strategy in the ADP) are also shown for fishing effort in 2018. 'Old' and 'New' refer to the cost curves and can be used to represent lower and upper bounds of cost efficiency, respectively.

Observer Budget	Alt. 2 Fee %	Cost Per Day		Days		Deployment Strata	Selection Rate	
		Old	New	Old	New		Old	New
\$3,048,677	1.00	\$1,836.41	\$1,648.12	1,660	1,850	HAL	0.090	0.100
						POT	0.090	0.100
						TRW	0.090	0.100
						TenP	0.090	0.100
						TenTR	0.090	0.100
\$3,810,846	1.25	\$1,770.27	\$1,446.59	2,153	2,634	HAL	0.116	0.143
						POT	0.116	0.143
						TRW	0.116	0.143
						TenP	0.116	0.143
						TenTR	0.116	0.143
\$4,573,015	1.50	\$1,526.44	\$1,279.57	2,996	3,574	HAL	0.158	0.180
						POT	0.151	0.155
						TRW	0.172	0.229
						TenP	0.152	0.158
						TenTR	0.178	0.252
\$5,335,184	1.75	\$1,389.71	\$1,182.08	3,839	4,513	HAL	0.190	0.215
						POT	0.156	0.160
						TRW	0.255	0.321
						TenP	0.161	0.167
						TenTR	0.286	0.372
\$6,097,354	2.00	\$1,302.23	\$1,118.18	4,682	5,453	HAL	0.221	0.250
						POT	0.161	0.166
						TRW	0.338	0.413
						TenP	0.169	0.177
						TenTR	0.393	0.492

The FVOA AND DSFU recommend that the Council advise the NMFS to only contract the next extension for two additional years. It has come to our attention that the Department of Defense has been granted special statutory acquisition authority that streamlines the requirements and is especially useful to engaging small business entities to facilitate competition. Their authority is titled "Other Transaction Authority" (OTA) (see attachment). We request the Council ask the Secretary of Commerce to seek from Congress similar statutory authority, that would streamline contracting for the partial coverage observer program, thereby reducing the regulatory burden and increasing the opportunity for competition and the introduction of lower, market-based rates. We note that the Secretary of Commerce has responded strongly to the President's call for streamlined regulations, and that Congress has focused increased attention on reforming acquisition regulations that discourage small business entry and inhibit competition, thereby imposing unjustifiable costs on the private sector and the government. We believe that there would be wide support from the affected fishing industry for this sort of reform being applied to the partial observer program.

There is no reason the federal government should be allowed to impose observer rates 2-4 times market rates directly to the vessel owners, crews and processors. Once the new acquisition authority has

been granted, the Council can consider recommending a longer-term contract with the more competitive rates.

There is a related observer issue that demands attention. The FVOA AND THE DSFU, on numerous occasions since implementation of the partial coverage observer program, has requested the Council to fix the exemption for taking an observer when delivering to a tender. This exemption has resulted in numerous expressed concerns of data manipulation from the Council's SSC, AP, OSC, and OAC. The Council's Advisory Panel suggests concerns in their minutes of May 2018 and February 2016; the OAC expressed concerns in their minutes of June 2018, October 2017 and September 2016; the SSC expressed concern in their minutes in June 2016, October 2016, June 2017, October 2017 and June 2018.

The OSC recently expressed the following in May 2019 of their review of the 2018 Observer Program results.

"The OSC continues to be concerned about the consistently high cancellation rates for selected trips in tender stratus and notes that most issues reported to Office of Law Enforcement (OLE) by FMA are related to ODD's now focus on tendering strata definitions."

Indeed, cancellations are listed at 37.5% for tendering in 2018 while other trawl cancellation rates are at 13.6%. In other years, fleet cancellation rates have been 40%. It should be a concern that the ODDs process is being manipulated relative to tender and observers with a 40% cancellation rate of not taking an observer in proper turn.

Over the last five years, the Council staff has developed, on two separate occasions, proposed regulatory options to fix the tendering loop-hole and its resulting bias, only to have previous Councils not take affirmative action. This adds insult to the injury of excessive fees on the Halibut/Sablefish fleets and their processors that contribute nearly 65% of all the observer fees for this program. The Council staff proposal to fix this tender exemption is in the "to do" box for the Council. We request the Council complete this fix. The Council might recall that, in the May 2017 Annual Review of the 2016 season, the tendering exemption resulted in the collapse of tendering data from Western Alaska, resulting in unusable data for Chinook bycatch and we are suspicious the same has occurred with Pacific cod deliveries and halibut bycatch.

In summary, the members of FVOA AND DSFU request the Council to petition the Secretary of Commerce to seek needed legislation that would provide streamlined acquisition authority, similar to that provided to DOD and NASA, for the purpose of securing competitive daily observer rates for the partial coverage observer program. We additionally recommend the Council advise NMFS not to sign a 5-year contract, but consider a two year-contract, with the view to the enactment of new acquisition authority.

The members of FVOA AND DSFU do not believe the current EIS provides an adequate basis for making a final action as it bases all of its costs and resulting fees from a sole source contractor, without answering why those rates are 2-4 times market rates of current observer providers. In fact, the EIS does not even acknowledge other, lower and competing rates that are available to the Alaskan fleets. The result of accepting this EIS and taking final action is to just give the observer program more money with no appreciable additional coverage rates as the increased rates are being absorbed by the escalating cost of the program. Meanwhile, if the fleets were left to themselves, they could acquire the required coverage ¼ to ½ the cost of the program currently administered by NMFS/NOAA. This discussion needs to be part of the EIS.

Chairman Simon Kinneen

September 16, 2019

Page 7

The tendering exemption, as it applies to the Pollock and Pacific cod fleets in the GOA needs to be fixed as well. It is worth repeating that the Council staff has provided initial options to the Council for fixing the tendering exemption. We reiterate our request the Council take the necessary steps to complete this fix.

The FVOA and DSFU strongly oppose any increase in the current observer fee rate until the Council completes the above requests.

Sincerely,



Robert D. Alverson
FISHING VESSEL OWNERS' ASSOCIATION
Manager

RDA:cb

Sincerely,



James J. Johnson
DEEP SEA FISHERMEN'S UNION
Executive Director

(http://acqnotes-beta.com)



AcqNotes (<http://acqnotes.com/>)

Defense Acquisitions Made Easy

HOME ([HTTP://ACQNOTES.COM/](http://acqnotes.com/))

ACQUISITION TOPICS ▾

REFERENCES ▾

MY PAGE ([HTTP://ACQNOTES.COM/ACCOUNT](http://acqnotes.com/account))SIGNUP ([HTTP://ACQNOTES.COM/REGISTER/MEMBERS-EDITION](http://acqnotes.com/register/members-edition))LOG IN ([HTTP://ACQNOTES.COM/LOGIN](http://acqnotes.com/login))SEARCH ([HTTP://ACQNOTES.COM/SEARCH](http://acqnotes.com/search))

Berton Manning
AcqNotes Creator
Sr. Acquisition Specialist

[Let's Connect](https://www.linkedin.com/in/ber-ton-manning-pmp/)

(<https://www.linkedin.com/in/ber-ton-manning-pmp/>)

MEMBERS MENU

MEMBERS HOME
([HTTP://ACQNOTES.COM/MEMBERS-HOME](http://acqnotes.com/members-home))

ACQUISITION NEWS
([HTTP://ACQNOTES.COM/ACQUISITION-NEWS](http://acqnotes.com/acquisition-news))

TOOLS & RESOURCES
([HTTP://ACQNOTES.COM/TOOLS-RESOURCES](http://acqnotes.com/tools-resources))

TUTORIALS
([HTTP://ACQNOTES.COM/TUTORIALS](http://acqnotes.com/tutorials))

REPORTS & PAPERS
([HTTP://ACQNOTES.COM/ARTICLES-WHITE-PAPERS](http://acqnotes.com/articles-white-papers))

RAPID ACQUISITIONS
([HTTP://ACQNOTES.COM/RAPID-ACQUISITIONS](http://acqnotes.com/rapid-acquisitions))

DOD MARKETPLACE

BUSINESS STEPS
([HTTP://ACQNOTES.COM/BUSINESS-STEPS](http://acqnotes.com/business-steps))

OPPORTUNITIES
([HTTP://ACQNOTES.COM/OPPORTUNITIES](http://acqnotes.com/opportunities))

GOV CUSTOMERS
([HTTP://ACQNOTES.COM/GOV-CUSTOMERS](http://acqnotes.com/gov-customers))

Contracts & Legal

Other Transaction Authority (OTA) (<http://acqnotes.com/acqnote/careerfields/other-transaction-authority-ota>)

Other Transaction Authority (OTA) is the term commonly used to refer to the (10 U.S.C. 2371b (<https://www.law.cornell.edu/uscode/text/10/2371b>)) authority of the Department of Defense (DoD) to carry out certain prototype, research and production projects. Other Transaction (OT) authorities were created to give DoD the flexibility necessary to adopt and incorporate business practices that reflect commercial industry standards and best practices into its award instruments. As of the 2016 National Defense Authorization Act (NDAA) Section 845, the DoD currently has permanent authority to award OT under (10 U.S.C. 2371 (<https://www.law.cornell.edu/uscode/text/10/2371>)) for (1) Research, (2) Prototype, and (3) Production Purposes.

Guide: Other Transaction Authority (OTA) Guide – Dec 2018 (<https://aaf.dau.mil/ot-guide/>)

Presentation: DAU Acquisition Symposium OT – 2018 (<http://acqnotes.com/wp-content/uploads/2014/09/DAU-Acquisition-Symposium-OT.pptx>)

(1) Research Purpose allows for basic, applied, and advanced research projects. These OTs are intended to spur dual-use research and development (R&D), taking advantage of economies of scale without burdening companies with Government regulatory overhead, which would make them non-competitive in the commercial (non-defense) sector. Traditional defense contractors are encouraged to engage in Research OTs, particularly if they sought to adopt commercial practices or standards, diversify into the commercial sector, or partner with Non-Traditional Defense Contractors.

(2) Prototype Purpose allows for projects directly relevant to weapons or weapon systems proposed to be acquired or developed by the DoD.

The statutory authority provides that OT shall be used to: "carry out prototype projects that are directly relevant to enhancing the mission effectiveness of military personnel and the supporting platforms, systems, components, or materials proposed to be acquired or developed by the Department of Defense, or to improvement of platforms, systems, components, or materials in use by the armed forces."

(3) Production Purpose allows for a noncompetitive, follow-on OTs to a Prototype OT agreement that was competitively awarded and successfully completed. This statute requires that advanced consideration be given and notice be made of the potential for a follow-on OT; this is a necessary precondition for a follow-on Production OT. As such, solicitation documents and the Prototype OT agreement shall include notice that a follow-on Production OT is possible.

What are the authorities?

OTs are not covered by the Federal Acquisition Regulations (FAR) (<http://acqnotes.com/acqnote/careerfields/federal-acquisition-regulation>) and are a highly flexible business tool, use of which requires application of astute business acumen to ensure smarter, more efficient acquisition of prototype systems for the DoD. OTs require a minimum of at least one nontraditional Defense Contractor participating to a significant extent in the project or a cost sharing arrangement requiring that at least one-third of the cost of the OTA come from non-Federal sources. (1)

Each military service has authority to execute OTs up to \$500M with authorization by their Service Acquisition Executive (SAE), and there are no limits on how many OTs may be executed by the services or the cumulative value of such awards. Beyond the \$500M threshold for individual OTs, USD(A&L) must provide authorization to proceed. There is no limit to the number or dollar value of OTs that the DoD may execute in the aggregate.

In accordance with statute, this authority may be used only when one of the following is met: (1,2)

1. The awardee is a non-traditional defense contractor OR a small business.

➤ RESOURCES
([HTTP://ACQNOTES.COM/BUSINESS-RESOURCES](http://acqnotes.com/business-resources))

- "Non-traditional defense contractor" is defined by statute as "an entity that is not currently performing and has not performed, for at least the one-year period preceding the solicitation sources by the Department of Defense for the procurement or transaction, any contract or subcontract for the Department of Defense that is subject to the full coverage under the cost accounting standards prescribed pursuant to Section 1502 of title 41 and the regulations implementing such section."

- "Small business" is defined under section 3 of the Small Business Act (15 U.S.C. 632).

2. The awardee is a traditional defense contractor, but at least one of the following applies:

- At least one non-traditional contractor is participating to a "significant" extent
- The awardee provides a financial or in-kind cost share – typically, a 1/3 cost share is required. However, the Government should not generally mandate cost-sharing requirements for defense unique items.
- The Service Acquisition Executive makes a written determination that exceptional circumstances justify use of OTA for the purpose of executing innovative business models or structures that would not be feasible or appropriate with a FAR-based contract.

What constitutes a prototype project?

The terms "prototype" and "prototype project" are not defined in statute or regulation. However, in 2002, the Under Secretary of Defense for Acquisition, Technology, and Logistics stated:

"With regard to section 845 authority, a prototype can generally be described as a physical or virtual model used to evaluate the technical or manufacturing feasibility or military utility of a particular technology or process, concept, end item, or system. The quantity developed should be limited to that needed to prove technical or manufacturing feasibility or evaluate military utility. In general, Research, Development, Test & Evaluation (RDT&E) appropriations will be appropriate for OT prototype projects."

What is an "other transaction" (OT)?

An OT is a common term that refers to any kind of transaction other than a contract, grant or cooperative agreement that is authorized by 10 U.S.C. 2371. Transactions pursuant to this authority can take many forms and generally are not required to comply with Federal laws and regulations that apply to procurement contracts, grants and/or cooperative agreements. To the extent that a particular law or regulation is not tied to the type of instrument used (e.g., fiscal and property laws), it would generally apply to an OT.

AcqLinks and References:

- Other Transactional Authority (OTA) Guide – 3 Dec 2018 (<https://aaf.dau.mil/ot-guide/>)
- Old [1] Other Transactional Authority (OTA) Guide – 17 Jan 2017 (http://acqnotes.com/wp-content/uploads/2014/09/Tab-5-OSD-OTA_Guide-17-Jan-2017-DPAP-signature-FINAL-002.pdf)
- [2] Other Transaction Authority (OTA) Overview (<http://acqnotes.com/wp-content/uploads/2014/09/Other-Transaction-Authority-OTA-Overview.pdf>)
- Old: Other Transaction Guide for Prototype Projects – Jan 01 (http://www.acqnotes.com/Attachments/Other_20Transactions_20Guide_20for_20Prototype_20Projects.doc)
- Old: Other Transaction Authority (OTA) Guide – Aug 2002 (<http://www.acqnotes.com/wp-content/uploads/2014/09/Other-Transactional-Authority-Guide-August-2002.pdf>)
- FAQ: Other Transaction (OT) Authority For Prototype Projects FAQs (<http://acqnotes.com/wp-content/uploads/2014/09/Other-Transaction-OT-Authority-For-Prototype-Projects-FAQs.doc>)
- Presentation: DAU Acquisition Symposium OT – 2018 (<http://acqnotes.com/wp-content/uploads/2014/09/DAU-Acquisition-Symposium-OT.pptx>)
- Report: CRS DoD Use of Other Transaction Authority: Background, Analysis and Issues for Congress – 22 Feb 2019 (<http://acqnotes.com/wp-content/uploads/2014/09/CRS-DoD-Use-of-Other-Transaction-Authority-Background-Analysis-and-Issues-for-Congress-22-Feb-2019.pdf>)
- Presentation: Air Force Other Transaction Authority (OTA) Overview – July 2016 (<http://acqnotes.com/wp-content/uploads/2014/09/OTA-Overview-July-2016-FINAL.pdf>)
- Article: Another Option in a Tightening Budget: A Primer on DoD "OT" Agreements by Cassidy, Plitsch and Barclay (http://www.acqnotes.com/wp-content/uploads/2014/09/Another_Option_in_Tightening_Budget_A_Primer_on_Department_of_Defense_Agreements.pdf)
- Article: Other Transaction (OT) Authority Mythology: Reflections on the Cure-all of DEFENSE Procurement (<https://www.linkedin.com/pulse/other-transaction-ot-authority-mythology-reflections-mcmartin-esq-j/>)
- Website: 10 U.S.C. 2371b "Authority of the Department of Defense to carry out certain prototype projects" (<https://www.law.cornell.edu/uscode/text/10/2371b>)
- Website: Existing OTA Consortium (<https://aida.mitre.org/ota/existing-ota-consortia/>)
- (Old) Members Tutorial: Other Transaction Authority (OTA) (<http://acqnotes.com/tutorials>)

Updated: 08/15/2019



(https://www.facebook.com/AcqNotes/)
247304352040331/)

AcqNotes Copyright 2010-19 (<http://acqnotes.com>)

Contact (<http://acqnotes.com/contact>)

About Us

Veteran Owned

(<http://acqnotes.com/about-us/>)

Legal

(<http://acqnotes.com/legal/>)

Consulting

Disclaimer: AcqNotes is not an official Department of Defense (DoD), Air Force, Navy, or Army website. Any information, products, services or hyperlinks contained within this website does not constitute any type of endorsement by the DoD, Air Force, Navy or Army. No federal endorsement of sponsors intended. The information contained in this Website is for informational purposes only and is not intended as a form of direction or advice and should not be relied upon as a complete definitive statement in relation to any specific issue. Access to and use of this websites information is at the user's risk.