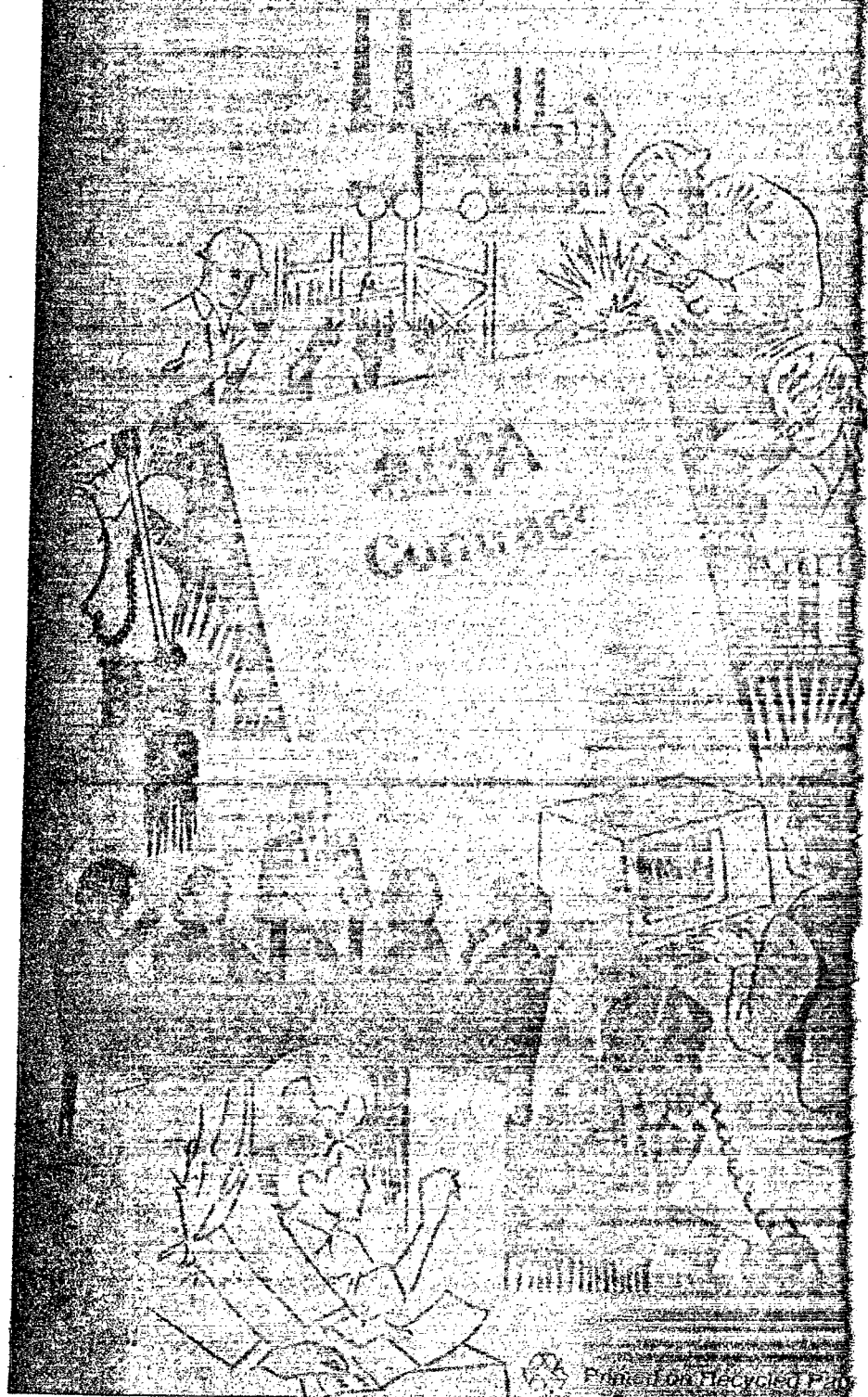


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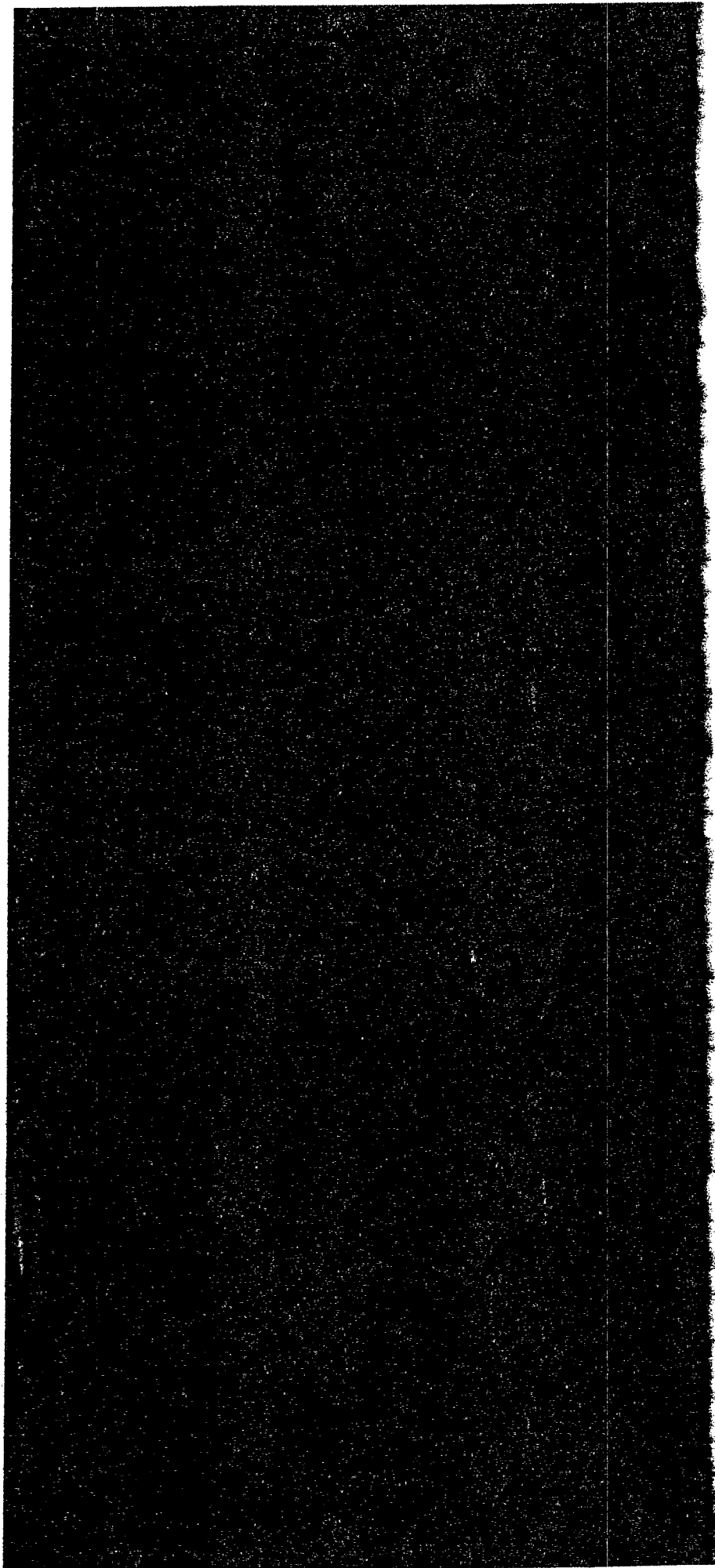
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Administration And Resources Management (PM-214)

# SEPA Competition Advocacy Program



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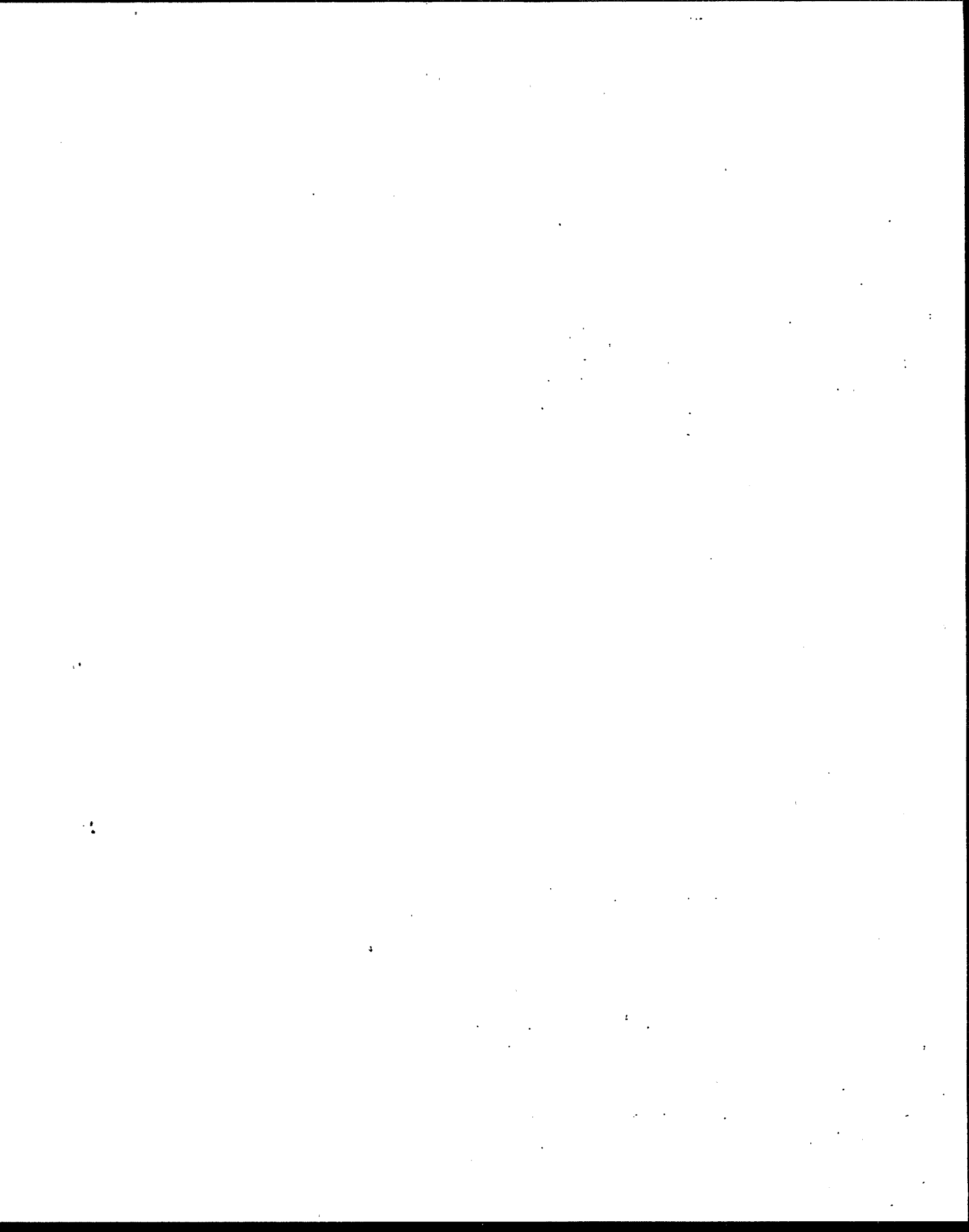


United States  
Environmental Protection  
Agency

# Competition Advocacy Program

Compiled by the  
Office Of  
Administration And  
Resources Management  
Office Of  
Acquisition Management

June 1993



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## **Executive Summary**

### **FY 92 Accomplishments**

The Agency established specific Fiscal Year (FY) 92 competition goals for all major programs. These goals were met by all except two programs. These two programs came within 3% of meeting their goals. The primary reasons why these programs did not attain the high goals set for FY 92 were the realignment of projects within the overall programs and the establishment of the long term contracting strategy. Overall, EPA obligated 96 percent of its contract dollars on a competitive basis during FY 92 which equalled the percentage obligated competitively in FY 90 and FY 91. The EPA expended approximately 1.3 billion dollars during FY 92 through the acquisition process.

EPA obligated 98 percent of its contract dollars for contracts in excess of \$25,000 through full and open competition. Of the small purchase dollars (actions of \$25,000 or less), 74 percent were obligated competitively.

### **Promoting Competition**

Acquisition and program personnel at all levels continued to challenge barriers to competition by utilizing innovative methods of competing the Agency's requirements and breaking apart requirements to allow industry to be more receptive to EPA's competitive solicitations. The incumbent contractor advantage has been reduced by exclusion of sources in certain situations and will be further emphasized in FY 93.

### **Functional Reviews**

The Agency Competition Advocate (ACA) performed functional reviews at the Agency's three major contract activities and contract representatives reviewed two small purchase activities. Justifications for Other than Full and Open Competition (JOFOC), amount of competition obtained for prime contract and subcontract awards, documentation, and awards under the 8(a) program were again

found to meet the requirements of the Competition in Contracting Act.

### **Specific Program Accomplishments**

The Agency has continued to enhance competition through the use of innovative procurement techniques. Contract personnel have continually emphasized minimizing the incumbent advantage and breaking out statements of work if competition is to be enhanced. When only one proposal is received, often the period of performance is reduced for the current award and resolicitation of the requirement is started to obtain better competition. Long term contracting strategies have been utilized in the programs. Requests for industry comments on proposed requirements have been utilized when time permits. Preproposal conferences are held to communicate to industry EPA's serious intentions for competition.

### **FY 93 Plans**

EPA acquisition personnel and the ACA will continue to be involved early in the acquisition cycle. Early planning is essential to increasing and enhancing competition. Contract personnel will again emphasize clear statements of work and unbiased evaluation criteria. Contracting Officers will analyze program contracting needs on a total program contracting strategy basis rather than on a contract by contract basis. The ACA and contract personnel will continue functional reviews. The ACA will monitor expenditure of program funds to ensure that FY 93 competitive goals are met. Justifications for Other than Full and Open Competition and Acquisition Plans will continue to be critically reviewed prior to approval with the goal of obtaining better competitions and reducing the incumbent advantage in follow-on acquisitions.



## Introduction

The Environmental Protection Agency (EPA) continues to be at the forefront of efforts to increase competition in Government contracting. The EPA has always emphasized competition in the acquisition of its requirements, resulting in impressive savings of taxpayer dollars and broadening the base of contractors with which the Agency contracts. The EPA expended a total of approximately 1.3 billion dollars for large and small purchases through the acquisition process during FY 92. This pamphlet discusses FY 92 competition results, the role of the Competition Advocate, and actions underway to further increase competition and strengthen the industrial base.

## EPA Organization

In December 1984, in accordance with the Competition in Contracting Act of 1984, the Director of the Procurement and Contracts Management Division appointed an Agency Competition Advocate (ACA) to promote full and open competition in the award of contracts. To aid the ACA, an associate competition advocate is located at each major contract activity and a competition coordinator represents each major EPA program. It is largely through adoption of this organizational structure that EPA was again able to award 96 percent of its total contract dollars available for competition (including small purchases) through the competition process during FY 92. The ACA's primary responsibilities are to:

- Develop, direct and maintain the competition program to ensure that competition initiatives are incorporated and implemented at all levels.
- Assure that oversight mechanisms are established to provide visibility on any problems or obstacles in obtaining competition.
- Establish Agency competition goals on specific programs and monitor progress towards those goals on a monthly basis. In

furtherance of these goals, maintain active liaison with competition coordinators and associate competition advocates.

- Ensure that competition is planned early in the acquisition process to minimize factors inhibiting full and open competition. Consider all reasonable competitive alternatives. Promote market research to identify competition potential in support of acquisition strategies before the procurement decision is irrevocably made. Ensure that individual acquisition plans are in concert with CICA and maximize competition.

- Review and approve/disapprove Justifications for Other than Full and Open Competition for proposed prime contracts exceeding \$100,000 and Determinations and Findings for exclusion of certain sources. JOFOCs of \$100,000 and less are reviewed through the functional review process at the operational level.

- Perform annual reviews of major contract activities and contract operations in the field. In this function, review Justifications for Other than Full and Open Competition and general documentation requirements for the award of prime contracts and subcontracts.

- Serve as the EPA spokesperson for competition to industry, other Government agencies, and EPA program offices.

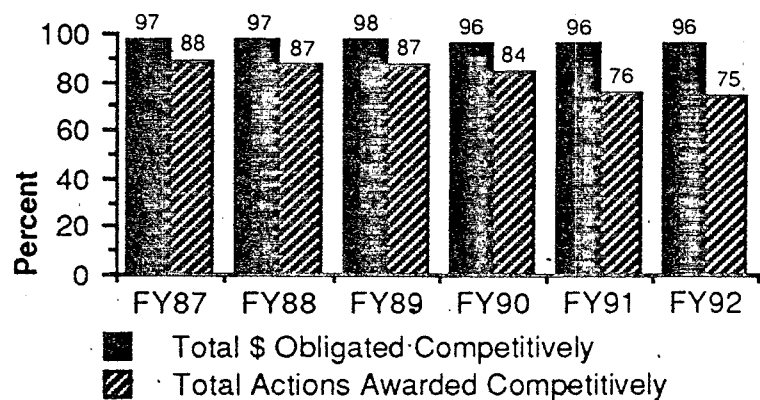
## **Competition Results Since The Enactment Of The Competition In Contracting Act Of 1984**

The EPA has consistently maintained an outstanding performance in its award of contracts by the competitive process. Full and open competition has allowed the Agency to reduce overall costs for its requirements and broaden its contractor base. By having more qualified, interested firms participating in the contracting program, the Agency will continue to maintain an excellent competitive posture. EPA staff are convinced that competition

provides lower costs, better cost control, higher quality, improved schedules; and a stronger industrial base. All these contribute to efficient use of taxpayer resources. The graph below depicts EPA's percentages of actions and dollars awarded competitively.

As in the past, these statistics are evidence that the Agency has recognized the need for and successfully achieved competition throughout EPA's programs. The Agency is continuously investigating new methods to competitively award contracts for its requirements and is obtaining greater response from the contracting community to its solicitations. The section on "Specific Areas in Which Competition has been Enhanced" provides impressive examples of innovative acquisition techniques.

### Competitive Awards FY87 - FY92



### Promoting Competition

Acquisition and program personnel at all levels continue to challenge barriers to competition. Specific areas in which competition has been enhanced in FY 92 are discussed later in this pamphlet. Contract and Program Specialists continue to emphasize competition by:

- *Analyzing major acquisitions involving a number of separate tasks to determine the acquisition method best suited to enhance competition. This includes examining each task and determining whether to separate tasks or combine them, depending on which method is most likely to generate the most competition.*

- *Improving the quality of specifications and statements of work, including in certain instances, publishing proposed requirements for public comment prior to issuance of a solicitation.*
- *Encouraging advance planning involving the contracting officer and ACA. Competition is best achieved when planned for early in the acquisition cycle. In some instances, all fiscal year requirements are being reviewed at the beginning of the year to develop a total contract strategy for a particular technical program.*
- *Researching technological developments and market trends to determine existing sources of supply and develop additional sources in support of the entire range of the Agency's acquisition needs.*
- *Taking proactive measures to increase the number of proposals received. These include market surveys, counseling contractors to make them more aware of EPA's requirements, holding preproposal conferences to allow dialogue between the Government's contract and program personnel and the contractor community, conducting post-award surveys of non-bidders and holding general program requirements conferences.*
- *Coordinating the activities of various subject matter specialists (engineers, attorneys, scientists, financial analyst, contract specialists) as necessary to carry out the plans and goals for increasing competition throughout the Agency.*
- *Promoting competition at procurement conferences and training seminars, to program personnel, contracting operations, and small purchase activities. Participants discuss results of the previous fiscal year and goals and plans for the next fiscal year. Question and answer sessions help to communicate the Office's competition philosophy and the requirements of the Federal Acquisition Regulation.*
- *Disseminating written policies and procedures throughout the Agency. The ACA annually updates the pamphlet describing EPA's*

competition program, which is distributed to Agency personnel and to members of the contract community.

- *Stimulating greater competition in subcontracting.* EPA conducted contractor purchasing system reviews at 13 major contractor facilities during FY 92.

Approximately eight reviews are planned for FY 93. A fundamental element of these reviews is the degree of competition exercised by prime contractors in their award of subcontracts. Contractor file documentation is reviewed to assure that competition is emphasized. Reviewers counsel contractors regarding the required documentation to support a subcontract award.

## **Dollar Goals And Accomplishments For FY 92**

Overall, EPA obligated 96 percent of its contract and small purchase dollars available for competition under full and open competition.

The Agency established specific FY 92 competition goals for all major programs. The ACA and the program competition coordinators mutually agreed to a percentage of dollars, ranging from 95 percent to 97 percent, that would be obligated for their requirements through full and open competition. The ACA reported progress toward these goals to each program monthly.

All except two programs met their goals in FY 92. These two programs came within 3 percent of meeting their goals. The primary reasons for not meeting goals were the realignment of projects within the overall program and the establishment of long term contracting strategies. Long term strategies take time to implement and may cause the need for "bridging the gap" sole sources prior to implementation. EPA obligated 98 percent of its available dollars for contracts in excess of \$25,000 through full and open competition equalling its FY 91's performance. The FY 92 percent remains exceptionally high and continues to reflect the emphasis placed by

EPA personnel on awarding contracts through the competitive process.

Of the small purchase dollars (contract actions of \$25,000 or less) available for competition in FY 92, 74 percent of these dollars were obligated competitively. This percentage is consistent with EPA's past record and is considered excellent for the types of requirements purchased using this means.

At the end of this pamphlet is a chart of FY 92 statistics.

## **Justifications For Other Than Full And Open Competition**

Only four percent of the Agency's obligated contract dollars were awarded without full and open competition. As in the past, EPA limited approvals of Justifications for Other than Full and Open Competition (JOFOCs) to those instances where, for example, the Agency had no other choice but to award on a noncompetitive basis. Situations when this occurs include if scientific objectives and Congressional mandates were to be achieved; when the public health and welfare was at stake; when time was of the essence to alleviate an immediate danger; or to allow additional time for the award of a follow-on contract. EPA will again strive to reduce noncompetitive situations in EPA during FY 93.

## **Functional Reviews**

The ACA performed functional reviews at three major contract activities. They are the Superfund/RCRA Procurement Operations Division in Washington DC, the Contracts Management Division in Cincinnati, and the Contracts Management Division in Research Triangle Park. The ACA issued a report on competition for each activity and held discussions with senior contract personnel. The following areas were reviewed and found in substantial compliance with the Competition in Contracting Act:

- Justifications for Other than Full and Open Competition.
- Degree of competition obtained for prime contract awards.
- Competition in subcontract awards.
- The contract activity's role in enhancing competition.
- Documentation of source selection for contract awards.
- Awards made under the 8(a) program.

Improvements are needed in the following areas:

1) the need for the prime contractor to obtain government consent prior to subcontracting and improve the submission of related backup information; 2) the prime contractor's decision to subcontract or compete the requirement in-house, 3) the contracting officers counsel of the prime contractor on the need for increased competition, 4) less reliance by prime contractors on the "uniqueness" exception to exempt the subcontract requirement from competition.

Contract personnel from the Quality Assurance Staff performed reviews at two small purchase activities during FY 92. The reviews verified that file documentation was in general compliance with the Competition in Contracting Act and has improved over past years. Contract personnel will correct those areas where inadequacies were found.

The ACA and reviewers again emphasized competition in all exit debriefings following the on-site functional reviews. They also held meetings with contract specialists and contracting officers to emphasize and promote the use of competitive procedures.

## **Specific Areas In Which Competition Has Been Enhanced**

The Agency has enhanced competition in many areas during FY 92 including the following:

### **Purchasing and Contracts Management Branch**

The Small Purchases Unit at Headquarters continues to improve its competitive procurement by consistently soliciting at least three sources for each procurement estimated above \$2500. The staff attends trade shows and meets with vendors to enhance its knowledge of the vendors available for particular goods or services.

In addition, the staff continues to improve its competition posture by the increased use of the Office of Small and Disadvantage Business Utilization. This effort ensures that minority and/or women-owned firms are identified and included on the source lists for competitive procurements.

The staff made a concerted effort to ensure that all requirements for Blanket Purchase Agreements (BPA's) were competed, to the extent possible, prior to the establishment of the BPA's. This effort has substantially reduced the number of BPA's established on a noncompetitive basis.

### **Remedial Action Branch**

Through the use of competition, a reduction of 33% in the estimated cost of a traditionally sole source effort was realized in a follow-on effort.

Procurement planning began well over a year ago when contract personnel and the Hazardous Site Evaluation Division (HSED) of OERR explored the possibility of seeking competition for the requirement entitled "Technical Support for the National Priorities List (NPL) Program." Three previous contracts for these services had been awarded to the Mitre Corporation on a sole source basis. A source sought synopsis was published in the Commerce Business Daily on September 4,



1991. The contracting officer received ten responses and with this evidence that a competitive market existed, determined to proceed competitively.

The RFP was issued to 152 interested firms on March 10, 1992. The contracting officer received four proposals and, after technical and business evaluations of the proposals, determined that two firms were within the competitive range. Contract personnel conducted negotiations with both firms and awarded a contract to Viar and Company in the amount of \$16,524,246.

Contract personnel performed a comparative analysis of the estimated cost of the new contract with the actual costs under the current contract. The analysis revealed that the average rate per hour had been reduced from \$79 per hour under the current contract to \$52.96 per hour under the new contract, a reduction of 33% in estimated contract cost. The Statement of Work for this effort remained essentially unchanged from earlier versions so the reduction in costs can be attributed to its competitive nature.

#### **Regional Contract Placement Branch**

The primary function of the Regional Contract Placement Branch (RCPB) is to implement the Long Term Contracting Strategy (LTCS). The strategy addresses the long term contracting needs of the Superfund program in a portfolio of Superfund contracts for the next ten years. During the last year RCPB has been actively involved in implementing these contracts, in particular, the classes of contracts known as Enforcement Support Services (ESS), Superfund Technical Assistance and Response Team (START), Time Critical/Rapid Response (TC/RR), and Response Action Contracts Strategy (RACS).

One of the key principles of the LTCS is enhancement of the competitive environment by reducing the size of contracts and thus creating more opportunities for small and disadvantaged businesses. In the case of ESS, the Agency published a Request for Information (RFI) in the Commerce Business Daily (CBD) to canvass the market to

determine the probable extent of competition. As a result, the Agency reshaped a zonal based program into a regional one. This approach allows for more, smaller contracts which should increase competition. More firms exist which are able to perform a smaller regional versus a larger zonal effort. These procurements are currently in process. ESS is the successor program to the Technical Enforcement Support (TES) program.

The START program represents another class of contracts which is being revamped from a zonal to a regional basis. It is a combination of the former Field Investigative Team (FIT) and Technical Assistance Team (TAT) programs. Although these two programs are being combined, the shift from a zonal to regional bases should result in a larger number of smaller contracts. This should increase the number of firms able to perform the effort.

The TC/RR program, the successor to the Emergency Cleanup Services Contracts (ERCS) program, is also being decentralized from a zonal to a regional basis. Smaller contracts focusing on a smaller geographical area should result in more firms participating in the program. As in the case of ESS, the TC/RR program published a RFI announcement in the CBD to test the market for competitive opportunities.

The RACs program is the follow-on program to the Alternative Remedial Contracting Strategy (ARCS). The number of regional versus zonal contracts will increase in accordance with the LTCS. The competitive benefits should be comparable to the TC/RR program where concentration on a smaller geographic area of the region, versus the larger geographical area of the zone, should result in more competition among interested firms.

A program that does not exist under the LTCS, but which RCPB is examining, is Federal Facility Oversight. RCPB recently published a RFI announcement in the CBD to assess the level of competition that exists for supporting such a program.

Another effort that RCPB was involved in last year to increase competition was the Pre-Qualified Offerors Procurement (PQOPS) program. In this program, the Agency examines firms' capabilities and then

establishes a pool of qualified contractors among which it competes requirements on a price basis. PQOPS supports site specific activities. RCPB awarded one PQOPS effort last year and has another in process for FY 93.

### **Procurement Operations Branch**

#### *Workstations*

The Workstations solicitation was issued as two separate lots, one for hardware and one for services. This allowed for maximum competition. Firms providing supplies/services applicable only to one of the lots could participate as well as firms providing supplies/services for both.

#### *Supercomputing*

The supercomputer solicitation was issued with performance and functional type specifications to maximize the number of potential offerors. The specifications and approach of the RFP allowed for a large variety of solutions which in turn created more competition.

#### *Facilities Management and Telecommunications Services*

During the initial stages of these two awards, the National Data Processing Division (NDPD) and the Procurement Operations Branch (POB) had planned to issue one solicitation with two lots. However, in order to enhance competition, the requirement was broken into two different solicitations. Each solicitation allowed offerors to team with partners for bidding purposes. In addition, a subcontracting plan was required which mandated 35% participation of small businesses. This approach allowed for broader competition than originally planned.

#### *Facilities Management— UNISYS Contract*

EPA actively promoted competition of subcontracts under this contract. Emphasis on

competition continues to be achieved through comprehensive reviews, follow-up of deficiencies, and denial of Contracting Officer consent when competition is not provided. As a result, subcontracts issued under this contract are primarily competitive procurements.

#### *High Speed Laser*

This procurement involves full and open competition. In order to make the procurement more competitive, POB revised the initial requirement of a prime contractor providing all of the equipment and maintenance to breaking the procurement into three lots to foster greater competition and lower prices.

#### *International Telecommunications*

This procurement involved full and open competition. The specifications were carefully written to allow *any* firm in the international telecommunications arena an opportunity to bid.

#### *Competitive GSA Schedule Buys*

POB awarded numerous delivery orders off GSA schedules. These required desk-top competition. In most cases, three or more firms were contacted to bid on these orders.

#### *OPPE Competition*

The Office of Policy, Planning and Evaluation (OPPE), and the Procurement Operations Branch (POB) have taken steps to enhance competition in OPPE's contracting. In February 1992, OPPE and POB held a joint conference where information on OPPE contracts was presented to over 100 members of the vendor community. OPPE contracts are being broken into smaller contracts in order to encourage more offers. Some contracts will be small business set-asides, some 8(a)s, and some fully competitive in order to develop multiple sources for future procurements. Attempts are being made to limit contract awards to one per firm on some procurements where multiple awards are expected. The intent is to develop

multiple sources and thereby enhance competition in the future.

#### **RTP Contracts Management Division**

RTP made a concerted effort to split the large level-of-effort "mission-type" acquisitions into smaller actions in order to enhance competition and expand the competitive base. They are as follows:

- Several acquisitions involved splitting the level-of-effort into three separate contracts which would be awarded either as a small-business set-aside, under full and open competition, or under the 8(a) program. Specific examples include:
  - "Statistical Analysis Support for the Assessment of Toxic Substances" in support of the Office of Prevention, Pesticides and Toxic Substances.
  - "Evaluations of Air Quality Modeling Techniques" in support of the Office of Air and Radiation.
- Several Requests for Proposals were issued which indicated award for an equal number of hours would be made to two separate contractors. It was specifically stated that the same contractor could not receive two awards. Examples include:
  - "Development and Implementation of an Acid Rain Program" in support of the Office of Air and Radiation.
  - "Technical Support for the Stratospheric Ozone Protection Program" in support of the Office of Air and Radiation.
- The requirements for several programs were separated into distinct work areas. This resulted in the award of separate contracts rather than one large or several parallel contracts with the same statement of work. Examples include:

- "Technical Support to the Stationary Source Compliance Division" in the Office of Air and Radiation.
- "Technical Support for Air Emissions Inventory" in support of the Office of Air Radiation.

RTP sponsored a minority business mini-trade fair and seminar designed to 1) introduce minority firms to EPA purchasing agents, 2) give minority businesses an opportunity to display their products and discuss potential business with EPA, and 3) identify minority vendors who could meet EPA's requirements.

#### **Cincinnati Contracts Management Division (CMD)**

In the first quarter of FY 1992, a Quality Action Team (QAT) was formed in CMD's Acquisition Management Branch to study the presolicitation planning process. The QAT recommended revising the presolicitation planning process. As a result, CMD has revised the process for FY 1993 to include a team approach to preplanning. The team includes the project officer, the contracting officer, the procurement analyst, the contract specialist, legal counsel and in those instances where there is an existing contract, the contracting officer for the existing contract. The team approach to determine the best acquisition strategy will identify potential conflicts and vulnerabilities early in the process prior to issuance of a Request for Proposal. It will also identify opportunities to maximize competition through clearer definition of the statement of work and by breaking apart requirements where appropriate.

In the second quarter of FY 1992, CMD revised procedures associated with 8(a) program support. The new procedures require closer coordination between the program, the Office of Small and Disadvantaged Business Utilization (OSDBU), the contracting officer and the procurement analyst during the acquisition planning stage of each procurement. The new procedures help assure selection of the best acquisition strategy.

In FY 1992, CMD devoted one FTE to a

joint effort with the Office of Research and Development (ORD) to review all onsite contracts at each ORD laboratory. During these reviews, ORD and CMD representatives focused attention not only on contract management issues but on the lack of competition on large onsite contracts, stressing the development of contracting strategies which promote competition.

In July, CMD met with the Office of Water, the Office of Science and Technology, and the Engineering and Analysis Division (OST) to develop competitive strategies for effluent guideline support. The group considered breaking contracts into functional areas rather than including all effluent support efforts in one contract and awarding contracts with potential seven year terms to cover the effluent guideline development process. In August, CMD participated in an open meeting with contractors which had been announced in the CBD. The meeting sought contractor input on how to make solicitations more competitive. Fifty contractor representatives attended the meeting. Additional meetings with OST are planned to develop contracting strategies which will maximize competition for upcoming acquisitions.

CMD continues to actively promote and seek competition on all awards as indicated by the following examples:

CMD has delayed recompetition of four large onsite laboratory contracts to enhance competition by better defining the Statement of Work and by breaking out discrete functions to be competed separately. In one instance, CMD reduced a three year contract to one year when only one proposal was received. CMD is currently working with the program on a market survey to determine whether the contract should be split into two requirements in order to attract competition.

When CMD received only one proposal in response to an I/M testing contract, the contracting officer extended the proposal period. During that extension, the contract specialist called every firm on the mailing

list to inquire what could be done to promote interest in the solicitation. Although firms did not identify any specific measures that could be taken, one firm stated that it would propose if the proposal period was extended another 30 days. Even though CMD's extensive efforts resulted in the submission of just two proposals, this represented a 100% improvement over the previous four solicitations for these services each of which had only one respondent. The program was also put on notice that a more aggressive competition strategy will be required for future I/M testing requirements.

## **Plans For Increasing Competition In FY 93**

EPA personnel will take the following actions to increase competition in FY 93:

- The ACA will continue to review all acquisition plans and planning documents. Innovative processes will continue to be developed to meet the needs of developing additional sources. The ACA will recommend breaking apart requirements to enhance competition.
- Contract personnel will continue to emphasize clear statements of work and unbiased evaluation criteria in developing requests for proposals. A major goal for FY 93 is the reduction of the incumbent advantage.
- Members of EPA's contract staff will continue to promote competition in acquisition courses presented to program personnel and to the contractor community. The pamphlet explaining the competition advocacy program will be updated and disseminated to EPA personnel and industry.
- The ACA will continue to review all Justifications for Other than Full and Open Competition in excess of \$100,000 making recommendations to the Office Director relative to these determinations and suggesting



methods to reduce these noncompetitive awards.

- The ACA and program personnel will agree upon goals for obligating dollars through the competitive process. The ACA will continue to monitor FY 93 competition goals for obligation of program funds.
- The ACA will meet with the division directors and other contract and program personnel to ensure all competition goals are met and policies and procedures for competition are followed. The ACA will emphasize advance planning at all meetings.
- Contract personnel and the ACA will continue to perform functional reviews. Reviewers will stress full and open competition in all exit debriefings following reviews of contract activities. Contract personnel will place emphasis on obtaining better competition, establishing additional sources, and reducing the "incumbent advantage".

## FY 1992 Competition Statistics

### Contracts

Procurement Actions Over \$25,000	Number Of Actions	Percentage Of Available Actions	Dollar Obligations (\$)	Percent Of Avail Dollars
1. Actions Available for Competition				
A. Actions Competed	7,680	98	1,193,067	98
B. Actions Not Competed	180	2	23,654	2
C. Total Available	7,860	100	1,216,721	100
2. Actions Excluded*	909	—	62,636	—
3. Total Actions	8,769	—	1,279,357	—

### Small Purchases

Procurement Actions \$25,000 and Below	Number Of Actions	Percentage Of Available Actions	Dollar Obligations (\$)	Percentage Of Availab Dollars
1. Actions Available for Competition				
A. Actions Competed	12,015	65	67,498	74
B. Actions not Competed	6,387	35	23,624	26
C. Total Available	18,402	100	91,122	100
2. Actions Excluded**	26,918	—	7,828	—
3. Total Actions	45,320	—	98,950	—

\* Includes awards made under the 8(a) set aside program.

\*\* Represents open market purchases of \$1,000 and below which are not required to be competed under the Federal Acquisition Regulation.