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SECRETARY OF THE AIR FORCE**



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**AIR FORCE COMPETITION AND
COMMERCIAL ADVOCACY**

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This instruction implements AFR 63-3, *Competition and Commercial Advocacy*, by providing guidance and procedures for personnel implementing the Air Force Competition Advocacy Program. To better understand the competition requirements, review FAR part 5, *Publicizing Contract Actions*, part 6, *Competition Requirements*, and part 7, *Acquisition Planning*.

(AFMC) AFI 63-301, 1 August 1997, is supplemented as follows:

(AFMC) This instruction implements AFR 63-3, *Competition and Commercial Advocacy*. This supplement does not apply to the Air National Guard or US Air Force Reserve units and members.

SUMMARY OF REVISIONS

This document is substantially revised and must be completely reviewed.

The following revisions are incorporated by this document: Retitled "Competition and Commercial Advocacy"; and elimination of information/guidance which duplicates AFFARS/AFPD language or which should be determined by the MAJCOM or field activity. Streamlines reporting procedures by con-

solidating Part I and Part II into one competition plan from each activity. Incorporates advocacy of commercial items as required by FAR. Adds requirement for an impediment tracking method.

(AFMC) Revisions are limited to those changes necessary to align the supplement with the last revision of AFI 63-301. Changes include revising supplement language to clarify that impediments to commercial practices are subject to impediment tracking and follow-up program, updating references to dates and applicable paragraphs of AFI 63-301, and renumbering the supplement attachment.

1. Air Force Competition and Commercial Advocacy.

1.1. Scope. Air Force Competition Advocates are responsible for promoting full and open competition and the acquisition of commercial items. This AFI addresses both of these responsibilities. The Air Force Competition Program, Plans and Report encompass both competition and commercial advocacy.

1.2. This AFI: 1) covers the assignment, duties and responsibilities of Air Force competition advocates; 2) establishes the format and schedule for submission of competition plans to the Air Force Competition Advocate General; and 3) establishes the process for assigning competition goals. This instruction implements 41 U.S.C. 418.

2. Assignment of Competition Advocates.

2.1. All Air Force procuring activities identified in AFFARS 5306.304-90 shall have a competition advocate. Commanders will designate an individual who:

2.1.1. Has extensive qualifications and knowledge of the types of acquisitions of the activity;

2.1.2. Is at a position level commensurate in grade or rank with the senior level program, product, or laboratory personnel with whom the advocate interacts and influences;

2.1.3. Has direct access to the commander on matters relating to competition, acts independently, and does not have duties or responsibilities that are inconsistent with the duties and responsibilities as competition advocate.

2.2. When a competition advocate is designated, Commanders shall notify SAF/AQC in writing. SAF/AQC will sign and forward a competition advocate certificate to the commander for signature and presentation to the competition advocate.

2.3. At HQ AFMC, HQ Space Command and the Air Logistics Centers, commanders will assign a full-time, designated staff to support the functions of the competition advocate.

2.4. Commanders shall ensure that all advocates have access to adequate technical and engineering personnel to 1) effectively challenge impediments to competition and 2) encourage use of commercial items and practices.

2.5. Commanders may assign alternate advocates to act in the absence of the competition advocate. Appointment of an alternate advocate may be made on a standing or continuous basis, however such alternate advocates may not function in this role for any period which exceeds thirty consecutive days. If a competition advocate will be absent for longer than thirty consecutive days, a formal competition advocate certificate, as described in paragraph 2.2 above, shall be obtained for the advocate's alternate/replacement. It is preferred that alternate advocates meet the qualifications of permanent competition advocates to act effectively in their absence.

3. Duties and responsibilities.

3.1. SAF/AQC, as the Competition Advocate General, shall:

- 3.1.1. Advise the Air Force Senior Procurement Executive on program acquisition strategies.
- 3.1.2. Receive Command Competition Plans (CCPs) and recommend goals to the Air Force SPE for Air Force activities. Goals will be established by 31 Dec each year.
- 3.1.3. Review and coordinate on all acquisition plans requiring approval by SAF/AQ.
- 3.1.4. Review and coordinate on all Single Acquisition Management Plans submitted in accordance with AFFARS 5307.
- 3.1.5. Ensure Air Force policies and procedures emphasize use of commercial items and practices.
- 3.1.6. Review and coordinate on all Justification & Approvals (J&As) requiring approval by SAF/AQ.
- 3.1.7. Act as the Air Force Competition Ombudsman, addressing issues and questions from industry and other sources on the competitive and commercial aspects of Air Force acquisitions.
- 3.1.8. Submit an Air Force Competition Program report, RCS: SAF-AQC(A)9444 to the SPE, by 31 Mar each year, detailing the prior year's competition and commercial successes and competition rate results. The report will contain the statistics of the percentage of Air Force dollars that were competed and the actions that were competed. The report will also address the requirements contained in FAR 6.502(b)(2). This report is designated emergency status code C-3, with a delayed precedence during emergency conditions. This report is not subject to MINIMIZE because it is not transmitted via message.

3.2. MAJCOM Commanders shall:

- 3.2.1. Establish a Competition Advocacy Program that meets the needs of the command and complies with Air Force regulation and policy for competition and commercial items.
- 3.2.2. Take all practicable steps to ensure the command's competition rate meets or exceeds the goals established by SAF/AQ.
- 3.2.3. Ensure the competition program is implemented at subordinate units.
- 3.2.4. Designate a competition advocate for the command that meets the criteria described in 2.1 above.

3.3. All competition advocates shall:

- 3.3.1. Promote competition and commercial practices in acquisition programs managed by their commander or an associated PEO or DAC. Advocates seek to improve the overall competitive performance and increase use of commercial practices by overcoming barriers such as requirements, policies, procedures, and decisions that restrict competition or limit applicability of commercial practices.
- 3.3.2. Participate in acquisition strategy planning through forums such as the Acquisition Strategy Panel process.

3.3.3. Coordinate or approve J&As as required by AFFARS subpart 5306. Competition advocates also periodically review samples of J&As below their approval authority which were initiated for contracts awarded by their activity. The purpose of these reviews is to identify the existence of significant problems in compliance with competition requirements. Identified problems and recommendations for corrective actions will be provided to appropriate levels of management for resolution.

3.3.4. Through J&A/AP reviews and participation in the acquisition strategy planning process, ensure that market research is planned, conducted, adequately documented and that all identified opportunities for competition and commercial practices have been fully considered.

3.3.5. Develop an activity competition plan on a fiscal year basis as described at 4. below.

3.3.6. Establish procedures to monitor competition performance of their activity. Advocates will keep the commander informed on activity performance and take all practicable steps to ensure the activity's competition rate equals or exceeds its assigned goal.

3.3.7. Effectively implement the competition program at subordinate units.

3.3.8. Maintain a program to identify, track, and follow-up on actions to remove impediments to competition and commercial practices to ensure that appropriate, effective, and timely actions are taken. MAJCOM competition advocates will establish implementing procedures for the program.

3.3.8. (AFMC) Competition advocates at Air Logistic Centers (ALC) and Product Centers shall establish impediment tracking and follow-up programs in accordance with the attached guidelines. ALC and Product Centers will determine how requirements for an impediment tracking and follow-up program should be applied to their subordinate units. Specific requirements of this supplement are optional for other AFMC organizations; however, those organizations must comply with AFI 63-301 requirements to maintain a tracking and follow-up program to remove impediments.

3.3.9. Promote source-development programs to assist potential sources with identifying business opportunities and becoming qualified sources. In AFMC:

3.3.9.1. The Small Business Office conducts source development, including processing source-qualification requests.

3.3.9.2. Competition advocates support source development by providing technical assistance and coordination, as necessary. This includes the review of disapproved source approval requests, including changes in approval status of previously approved sources, as necessary to ensure that such disapprovals are appropriate.

3.3.10. Act as the Competition Ombudsman for contractor issues and as the principal liaison between government and industry in investigating and eliminating barriers to competition and use of commercial items.

3.3.11. In AFMC, monitor the Department of Defense Spare Parts Breakout Program and the procurement data-screening process to identify and correct problems that inhibit competition. AFMC Competition Advocates must support the DoD Replenishment Parts Purchase or Borrow Program by identifying candidates and encouraging potential contractors to participate.

3.3.12. Act as the task order Ombudsman for contractor issues on issuance of task orders on multiple award contracts.

3.3.13. Identify competition conversion opportunities through activities such as J&A reviews, AP reviews, and the impediment identification and tracking/follow-up program.

3.3.14. Review and provide appropriate comments on determinations made in accordance with FAR 9.202(b) that it would be unreasonable to specify the standards for qualification which a potential offeror (or its product) must satisfy in order to meet established qualification requirements.

4. Competition Plans.

4.1. Subordinate activities submit their Competition Plans to the MAJCOM. MAJCOM plans consolidate the plans of their subordinate activities. Competition Plans are designated RCS: SAF-AQC(A)9445. This report is designated emergency status code C-3, with a delayed precedence during emergency conditions. This report is not subject to MINIMIZE because it is not transmitted via message.

4.2. MAJCOM and Direct Reporting Unit competition advocates submit plans for each fiscal year to SAF/AQC by 31 Oct.

4.3. Plans shall be approved at one level above the DCS, director or division chief of contracting.

4.4. Plans shall include, at a minimum:

4.4.1. Projected obligations, projected competitive obligations, and corresponding projected competition rate (which is the percentage based ratio of total dollars obligated competitively to total dollars obligated) in matrix format. Projections should include PEO and DAC program obligations, but exclude obligations which would be recorded in the J001 as not available for competition. Subordinate activities that are listed separately in the J001 Report shall be separately identified with their projected performance data.

4.4.2. Supporting explanation for any significant differences between the previous year's projections and the actual data known at the time of submission of the report.

4.4.3. Current rate compared to the assigned goal in matrix format. The current rate shall be obtained from the data in the latest J001 report available at the time the activity competition plan is prepared. Subordinate activities that are listed separately in the J001 report shall be separately identified with their current rate and previous year's goal. The matrix shall be annotated with paragraph references for each significant difference between the assigned and latest available J001 rates. Supporting explanation for any significant differences between the projected competition rate and the goal from the previous year will be provided.

4.4.4. Opportunities and actions taken to acquire commercial items and use commercial practices to meet the needs of the activity.

4.4.5. Opportunities and actions taken to achieve full and open competition in the contracting operations of the activity.

4.4.6. Actions taken to challenge requirements that are not stated in terms of functions to be performed, performance required, or essential physical characteristics.

4.4.7. Any condition or action that has the effect of unnecessarily restricting the acquisition of commercial items or competition in the contracting actions of the activity.

- 4.4.8. A listing of significant noncompetitive system and subsystem programs, including repetitive procurements, targeted for conversion to competition. Conversion target dates shall be included.
- 4.4.9. Impediments which are planned to be removed, the plan for their removal, the office of primary responsibility, and the forecasted milestones for completion.
- 4.4.10. All other initiatives, actions, and success stories for improving competition or the acquisition of commercial items.
- 4.5. If the final fiscal year rate for a MAJCOM is significantly different than the rate known at the time of plan submission or the previous year's projections, SAF/AQC may require submission of a follow-up report no later than 30 Jan detailing the final rates for the MAJCOM and reconciling actual performance with their projections. SAF/AQC will request this report at the time that goals are issued.
- 4.6. MAJCOMs that achieve a 95% competition rate (dollars) are not required to submit a competition plan. However, MAJCOMs that are in this category shall submit a memo to SAF/AQC with a breakout of their subordinate activities and overall MAJCOM rates (both for actions and dollars) and a summary of their commercial practice initiatives and successes during the previous fiscal year. This memo shall be submitted by 31 Oct each year and be signed by the competition advocate.
- 4.7. The competition plan will serve as the nomination package for any activity or MAJCOM being submitted as a nominee for the unit or MAJCOM Outstanding Contribution to Competition awards. By the suspense date identified in AFI 36-2835, Chapter 3, MAJCOMs should submit a letter specifically identifying the unit being nominated and/or their desire to be considered in the MAJCOM category. Activities that are not required to submit plans based on paragraph (e) above, must submit a nomination package based on the criteria identified in AFI 36-2835, Chapter 3, to be considered for unit or MAJCOM competition awards.

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Attachment 1 (Added-AFMC)**IMPEDIMENT TRACKING AND FOLLOW-UP PROGRAM**

A1.1. (Added-AFMC) ALCs and Product. ALCs and Product Centers will establish a program for identifying and following-up on impediments to competition or use of commercial practices using the following guidelines.

A1.2. (Added-AFMC) Procuring Activity. Procuring activity competition advocates identify impediments to competition or use of commercial practices which may require tracking and follow-up action.

A1.2.1. **(Added-AFMC)** Impediments involve factors which act to limit competition or use of commercial practices. In most cases impediments will be acquisition specific because they impact competition or use of commercial practices on specific items, systems, or services. Impediments can also be systemic in nature by having the effect of unduly restricting competition or use of commercial practices for a broad range of acquisitions. Examples of acquisition specific impediments are missing or incomplete data packages, limited rights to data, and limited availability of tooling. An example of a systemic impediment would be a policy or practice which has a negative impact on competition or use of commercial practices. Both types of impediments are subject to the impediment tracking and follow-up program.

A1.2.2. **(Added-AFMC)** The primary vehicle for identifying impediments is J&A reviews; however, other normal activities of the competition advocate, such as participation in acquisition planning meetings, review of acquisition plans, and competition plan development, also provide opportunities for identifying impediments. When participating in J&A reviews, acquisition plan reviews, and other acquisition planning activities, the competition advocate will use market research results as a primary source of information for identifying potential impediments to the use of commercial practices.

A1.3. (Added-AFMC) Evaluate Identified Impediments. Evaluate identified impediments to determine if actions to remove those impediments are warranted. When a determination is made that removal action is warranted, establish an impediment removal plan.

A1.3.1. **(Added-AFMC)** Base evaluations on analyses to determine if impediment removal actions are practical in terms of a comparison of anticipated benefits associated with competition or use of commercial practices versus the estimated costs associated with removing the impediment.

A1.3.2. **(Added-AFMC)** Impediment removal plans address actions to be taken, organizational responsibilities for accomplishing those actions, and appropriate completion milestones. Revise impediment removal plans, including related milestones, as circumstances warrant. For example, reevaluation is appropriate when it becomes apparent that the current plan is not proving to be effective in removing an impediment in a timely manner. Under such circumstances the reevaluation may lead to a new or revised plan of action, or may result in a decision that further efforts to remove the impediment are no longer justified.

A1.3.3. **(Added-AFMC)** Cognizant technical or program management organizations normally accomplish evaluations and develop impediment removal action plans. Results of evaluations, including any impediment removal plans, are coordinated with all appropriate parties. Coordination's normally include all organizations which will ultimately have responsibility for impediment removal action and the competition advocate. For impediments identified as a result of J&A reviews, complete the evaluation and action plan development as part of that process, and summarize results as part of the J&A content dealing with actions being taken to remove or overcome barriers to competition.

A1.3.4. **(Added-AFMC)** Procuring activity competition advocates ensure that evaluations are accomplished for all identified impediments. Where appropriate, these responsibilities include notifying the cognizant technical or program management organization of the need to accomplish such evaluations/reevaluation and working with those organizations as appropriate to ensure that the evaluations/reevaluations are completed. As part of their responsibility, the competition advocates ensure that decisions are justified and that appropriate impediment removal action plans are developed. These responsibilities are carried out through the competition advocate's role in reviewing/approving J&As and as the commander's representative for identifying and challenging barriers to full and open competition or use of commercial practices. Competition advocates maintain appropriate documentation of action plans to be used as the basis for tracking impediment removal actions and for use in developing center competition plans.

A1.4. (Added-AFMC) Procuring Activity. Procuring activity competition advocates develop and document a process to track and monitor the status of planned actions to remove impediments. The process also provides for follow-up of identified problems, to include a mechanism to ensure the timely elevation of unresolved problems to appropriate levels of management.

A1.4.1. **(Added-AFMC)** Competition advocates determine the method used to track impediment removal actions. The method will provide a means to regularly review the status of planned actions and determine the need for follow-up.

A1.4.2. **(Added-AFMC)** Significant delays in completing planned actions will result in appropriate follow-up. Such follow-up actions may include a request to the organization responsible for implementation of the impediment removal action for their plan to resolve the identified problem. Where determined to be appropriate, follow-up may include action to initiate a reevaluation of the current plan to determine if an alternative plan of action is appropriate.

A1.4.3. **(Added-AFMC)** Unresolved problems are elevated to appropriate levels of management to achieve satisfactory resolution. This includes elevation to the commander level if lower levels of management are unable to bring the issue to a satisfactory conclusion.

A1.5. (Added-AFMC) Procuring Activity Competition. Procuring activity competition advocates generate and maintained data at the local level which will allow for the effective management of the impediment tracking program.

A1.5.1. **(Added-AFMC)** Specific data to be generated/maintained is determined locally, but such data will provide an adequate basis for evaluation of organizational effectiveness in removing impediments in an efficient and timely manner. Examples of the type of data which might be generated/maintained includes the following.

- Total number of ongoing impediments removal actions being tracked.
- Number or percentage of impediments removal actions being tracked which are overage (i.e., actions which have not been completed by the action plan completion date).
- The average number of days overage impediments removal actions exceed the action plan completion date.
- Total number of impediments removal actions which have been closed/completed during the period.

- Number or percentage of completed impediment removal actions which were closed on time (i.e., actions were brought to closure by the action plan completion date).

A1.5.2. (**Added-AFMC**) Maintain data for each major organization within the procuring activity with responsibilities for impediment removal actions. Make that data available to management within those organizations on a regular basis. Also maintain data on a procuring activity wide basis and make that data available to the procuring activity commander in conjunction with requirements established in AFI 63-301, paragraph 3.3.6.