

Advocacy Recommends that SBA Reconsider the Impact of Proposed Revisions to Size Standards on Small Government Contractors

On June 14, 2011, the Office of Advocacy (Advocacy) filed a comment letter with the Small Business Administration (SBA) regarding the SBA's proposed rule: *Small Business Size Standards: Professional, Scientific and Technical Services*. 76 Fed. Reg. 14323 (March 16, 2011). A complete copy of Advocacy's letter to SBA may be accessed at <http://www.sba.gov/advocacy/816>.

- On March 16, 2011, the SBA issued a proposed rule that would increase the small business size standard for 35 industries and one sub-industry in the North American Industry Classification System (NAICS) Sector 54, Professional, Scientific, and Technical Services and one industry in NAICS Sector 81, Other Services.
- On May 12, 2011, Advocacy filed a comment letter requesting SBA give stakeholders "more time to evaluate and to formulate formal comments." In response, SBA extended the comment period from May 16 to June 15, 2011.
- Some architecture and engineering services stakeholders have expressed grave concern that a size standard increase from \$4.5 million to \$19 million is not warranted and will stifle competition. Others support an increase because of the increasing size of Federal architecture and engineering contract awards. In the June 14 letter, Advocacy recommended a size standard that allows for growth but is less than \$19 million.
- Advocacy also recommended SBA give careful consideration to the differences in the surveying and mapping and geospatial markets in determining the correct size standards for each of these unique industries.
- Advocacy recommended SBA also give careful consideration to the testimony from the American Institute of Certified Public Accountants regarding the methodology used to calculate the proposed size standard for NAICS codes 541211 (Offices of Certified Public Accountants) and 541219 (Other Accounting Services).

For more information, visit Advocacy's web page at <http://www.sba.gov/advocacy>, or contact Assistant Chief Counsel for Procurement, Major L. Clark, III by email at Major.Clark@sba.gov or by phone at 202-205-7150.