April 20, 2016

Ms. Mary Davie
Assistant Commissioner
Office of Integrated Technology Services
Federal Acquisition Service
General Services Administration
1800 F Street, NW
Washington, DC 20405

RE: GSA Cybersecurity Services Request for Information (RFI); Solicitation No. QTA00DF16DPI0002

Dear Ms. Davie:

On behalf of the members of the Information Technology Alliance for Public Sector (ITAPS) [1], I am providing feedback to the Cybersecurity Services RFI posted by the General Services Administration (GSA) on fbo.gov on April 11, 2016. The RFI seeks information regarding cybersecurity products and services that industry can offer to federal agencies to secure their data and digital infrastructure. Cybersecurity is one of the biggest challenges facing both the federal government and private sector, and cyber threats continue to evolve at a rapid pace and become more sophisticated. While our members appreciate the opportunity to share our perspectives and comment on this RFI, we want to alert you to some of our concerns and questions.

ITAPS members are disappointed and discouraged in the amount of time GSA gave industry to respond to this RFI. GSA's original posting on April 11th gave stakeholders only nine days to respond, and even denied a request for an extension to allow the providers of the goods and services GSA is seeking to learn more about adequate time to prepare response that address such a critical topic for our nation's security. Typically, these sorts of RFI's give respondents 30 or 60 days to submit. Simply put, the time provided is not adequate.

Additionally, GSA collected comments from industry on the Cyber SIN RFI in September of 2015. ITAPS members noticed that some of the questions between the Cyber SIN RFI and this RFI on Cybersecurity Services are similar and want to better understand the results from the last RFI in order to provide more substantial comments to this latest one. GSA should post what the agency learned from the Cyber SIN responses and how that RFI corresponds with GSA's new request for information. We recommend that GSA set up a page on Interact, a proven communication tool, to encourage a continuing dialogue on this evolving topic.

Finally, some analysts have suggested that RFI implies GSA's move to bring cybersecurity into a category management framework. While we support the government's initiatives to consolidate requirements and leverage buying power, this framework has not yet been proven effective in the federal marketplace to date. Only three other information technology proposals have been introduced, and only one has been finalized. Because of the ever-changing nature of cyber threats, we strongly encourage GSA to act as nimbly as possible when procuring cybersecurity goods and services and not rush to put the technology in a strict buying framework.

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[1] **About ITAPS**. ITAPS, a division of the Information Technology Industry Council (ITI), is an alliance of leading technology companies building and integrating the latest innovative technologies for the public sector market. With a focus on the federal, state, and local levels of government, as well as on educational institutions, ITAPS advocates for improved procurement policies and practices, while identifying business development opportunities and sharing market intelligence with our industry participants. Visit itaps.itic.org to learn more. Follow us on Twitter @ITAlliancePS.

Thank you again for the opportunity to respond to this request and share our viewpoints. We look forward to working with GSA and we are available at any time to elaborate on our response. Should you have any questions regarding these comments, please contact Pamela Walker, Senior Director of Federal Public Sector Technology at (202) 626-5725 or pwalker@itic.org.

Respectfully Submitted,

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Senior Vice President, Public Sector