

Research Administration Office

University of California

LETTER

Reply Requested

February 16, 1995

CONTRACT AND GRANT OFFICERS

Subject: FAR Clause 52.247-67, Submission of Commercial Transportation Bills to the General Services Administration for Audit (FEB 1995)

A December 28, 1994, amendment to the Federal Acquisition Regulations added a new clause to the FAR at 52.247-67 called "Submission of Commercial Transportation Bills to the General Services Administration for Audit." The clause is effective February 27, 1995, and is applicable to cost-reimbursement contracts and subcontracts when "reimbursement of transportation [will be] a direct charge to the contract or subcontract" (see Enclosure 1). The clause requires contractors and first-tier subcontractors to submit to GSA copies of freight invoices, commercial bills of lading, and supporting documents, for any transportation charges over \$50.

This clause is primarily intended for either service contracts or contracts for the provision of transportation, i.e., cases where transportation costs are liable to be significant and the Government has a legitimate interest in making sure that carriers do not overcharge. We have been informed by the FAR Council and GSA, however, that there is no exemption either for research or for contracts performed by universities. Thus you may find that Contracting Officers may ask you to accept this clause when there are proposed costs for shipping or personnel moving expenses.

As of now, the paperwork burden associated with this clause has not been approved for use at nonprofit institutions (see Enclosure 2) and thus we cannot be forced to accept it. If Contracting Officers persist in including the clause in our contracts, RAO can take the matter up with the Office of Information and Regulatory Affairs (OIRA), the agency that handles paperwork clearances. Right now, though, we are not sure what Contracting Officers will do, and so we are requesting that you let us know if you are asked to accept the clause at 52.247-67.

Refer:

Bill Sellers

510-987-9847

william.sellers@ucop.edu

Subject Index: 07, 17, 19

Organization Index: F-622

David F. Mears

Director

Research Administration Office

Enclosures [not scanned]