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**Sent:** Tuesday, April 14, 2015 09:01 AM  
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sectionnumber:

comment: Section 817:

“Subparagraph (C) refers to DoD establishing qualification requirements per 10 USC 2319. We recommend that contractor or subcontractor acquisitions from “trusted suppliers” of “qualified parts” identified on a list of qualified electronic parts that DoD administers and that are used in the fabrication of end products for delivery to DoD, be extended some relief of liability if such products later prove to be counterfeit. We recommend that that DoD consider assuming the responsibility for the authenticity of such products and suppliers in the same fashion that they assume liability for GFP.

We suggest that, in its proposed rule, the DARC clarify:

At what point in the parts acquisition cycle will the notice and added authentication requirement of the revised subparagraph (B) be required where parts are acquired from “alternate” suppliers;

Whether subparagraph (d) is interpreted to mean that where contractors perform certain qualification and administrative functions, those sources will be consider “trusted suppliers” pursuant to the requirements of Section 818;

Whether the notice requirements of subparagraph (B) be limited to only non-contractor approved, non-OCM authorized distributors.”