

On behalf of the Aerospace Industries Association (AIA) I offer the following as recommendations to be incorporated into the Frequently Asked Questions (FAQs) for DOD's implementation guidance on Section 3610 of the CARES Act.

1. Paragraph (a) of DOD's Class Deviation states "The maximum reimbursement authorized by section 3610 shall be reduced by the amount of credit a contractor is allowed" by other COVID-19 related assistance and relief, whereas subparagraph (b)(6) states "Costs made allowable by this section are reduced by the amount the contractor is eligible to receive" from other COVID-19 related assistance and relief. Can DOD clarify that the maximum reimbursement a contractor can receive should be reduced by credits the contractor actually receives versus what they are eligible to receive?
2. Can DOD clarify that the "40 hours per week" figure can apply for employees on alternative work schedules (i.e., '9/80' or 'compressed' work schedules)?
3. Can DOD clarify that various types of funding (e.g., RDT&E, Procurement, O&M) can be used for reimbursements under Section 3610?

Best Regards,

**John Luddy** | *Vice President, National Security Policy*