IUID Frequently Asked Questions

IMPLEMENTATION

1. When are Unique Item Identifiers (UIIs) and Government unit acquisition costs to be provided by the contractor?

Answer: UII and acquisition cost will be included in the Material Inspection and Receiving Report provided at the time of item delivery to the Department of Defense (DoD).

2. If an item with no UII and valued at over $5,000 is brought in for repair to a contractor who is not the OEM, the item is repaired and returned to a condition ready for use, does the repair contractor need to put a UII on the item before acceptance?

Answer: If the Contractor Logistics Support (CLS) contract requires the CLS contractor to furnish spares/repair parts to DoD as a part of CLS, then the CLS contractor is delivering items to DoD. Thus, the CLS contract should have the DFARS clause on item identification and valuation included and the CLS contractor should be required to IUID items that it delivers to the DoD.   If the CLS contractor is just a depot maintenance operation and is only repairing items that DoD owns, then the requiring activity has the option to have the repaired items IUID'd by the CLS contractor, if it chooses to do so.

3. How do you address assemblies of property items that each have a UII and are reconfigured during transfer to another site?

Answer: It is assumed that the assemblage of property items that each has a UII is an end item with its own UII. In this case, if items were reassembled into a new end item, the new end item would require a new UII. If previous end items so assembled were deconstructed during this process, the UIIs that belong to those end items would be retired. All sub-components would retain their original UII.

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BACKGROUND

4. Why does the Department of Defense (DoD) need reliable information on the identity of the assets it owns?

Answer: The federal Government lacks complete and reliable information for reported inventory and other property and equipment, and cannot determine that all assets are reported, verify the existence of inventory, or substantiate the amount of reported inventory and property (Source: General Accounting Office (GAO) GAO-02-447G, Executive Guide, Best Practices in Achieving Consistent, Accurate Physical Counts of Inventory and Related Property, March 2002, page 6).

5. What capabilities does the DoD need for managing the assets it owns?

Answer: The federal Government needs the ability to (1) know the quantity, location, condition, and value of assets it owns, (2) safeguard its assets from physical deterioration, theft, loss, or mismanagement, (3) prevent unnecessary storage and maintenance costs or unnecessary purchase of items already on hand, and (4) determine the full costs of Government programs that use these assets (Source: GAO-02-447G, Executive Guide, Best Practices in Achieving Consistent, Accurate Physical Counts of Inventory and Related Property, March 2002, page 6).

6. Why does the DoD need useful, reliable and timely inventory data for daily management needs?

Answer: In the 1990s, the Congress passed the Chief Financial Officers Act of 1990 and subsequent related legislation, including the Government Management Reform Act of 1994, the Government Performance and Results Act of 1993, and the Federal Financial Management Improvement Act of 1996. The intent of these acts is to (1) improve financial management, (2) promote accountability and reduce costs, and (3) emphasize results-oriented management. For the Government's major departments and agencies, these laws (1) established chief financial officer positions, (2) required annual audited financial statements, and (3) set expectations for agencies to develop and deploy modern financial management systems, produce sound cost and operating performance information, and design results-oriented reports on the Government's financial position by integrating budget, accounting, and program information (Source: GAO-02-447G, Executive Guide, Best Practices in Achieving Consistent, Accurate Physical Counts of Inventory and Related Property, March 2002, page 5).

7. What is required to properly account for items?

Answer: Proper accountability of items requires that detailed records of produced or acquired tangible items be maintained, and that items be properly reported in the entity's financial management records and reports. Detailed asset records are necessary to help provide for the physical accountability of items and the efficiency and effectiveness of operations. Physical controls and accountability over items reduce the risk of (1) undetected theft and loss, (2) unexpected shortages of critical items, and (3) unnecessary purchases of items already on hand. These controls improve visibility and accountability over items, which help ensure continuation of operations, increased productivity, and improved control of inventories and Government property in the possession of contractors.

8. Is the DoD required by regulation to establish accountability records for all the items it obtains?

Answer: Accountability of items begins when hardware (equipment), and supplies (materials and consumables) are acquired through purchase, lease, or other means, including transfer or fabrication, whether the hardware and supplies are already in existence or must be created, developed, demonstrated and evaluated. DoD Instruction 5000.64 requires that accountable records be established for all property (i.e., property, plant and equipment) purchased, having a unit acquisition cost of over $5,000 or more, items

that are classified or sensitive, and items located at third parties, regardless of acquisition cost. Property accountability records and systems should follow the 5000.64 exactly: part number, cost, national stock number, serial numbers, bar codes, or other unique identifiers (e.g., hull, building numbers, aircraft tail numbers, vehicle registration, disposal turn-in document number, as may be appropriate and necessary), as well as other data elements. For materiel covered under DoD 4140.1-R, accountable records are established for all materiel received, regardless of cost.

9.   What is the DoD Business Enterprise Architecture (BEA)?

Answer: In June 2001, the Secretary of Defense established the Financial Management Modernization Program (FMMP) as one of his top priorities. The FMMP is developing the BEA that will provide a blue print for modernizing and standardizing DoD business processes and systems, to include requirements to facilitate capturing information on items in property and inventory management systems.

GENERAL

10. What is an item?

Answer: An item is a single hardware article or a unit formed by a grouping of subassemblies, components or constituent parts. In the DoD, an item is any article produced, stocked, stored, issued, or used; or any product, including systems, materiel, parts, subassemblies, sets, and accessories. Items can be classified into the categories of Equipment, Reparables, Material, and Consumables.

Equipment. Equipment is defined as items that are not held for sale or consumed in normal operations. This category includes military equipment, support equipment, general-purpose equipment, special test equipment, and special tooling. Includes Class VII, Major End Items, a final combination of end products that is ready for its intended use, that is, launchers, tanks, mobile machine shop, and vehicles, etc (DoD 4140.1-R).

Reparables. A reparable is an item of supply subject to economical repair for which repair (at either depot or field level) is considered in satisfying computed requirements at any inventory level (DoD 4140.1-R). Examples include aircraft engines, rotors, guidance systems, and electronic circuit boards. Excludes medical equipment parts.

Material. Material is defined as being of, composed of, or pertaining to physical substances (The American Heritage Dictionary). Materials are items that may lose their identity when incorporated in an end item. (e.g., sheet metal). FAR 45.301 defines material as property that may be incorporated into or attached to a deliverable end item or that may be consumed or expended in performing a contract. It includes assemblies, components, parts, raw and processed materials, and small tools and supplies that may be consumed in normal use in performing a contract. It does not include real property, reparables, or consumables.

Consumable. A consumable is an item of supply that is normally expended or used up beyond recovery in the use for which it is designed or intended (e.g. clothing and supplies) (DoD 4140.1-R). Explosives are treated as consumable items; and bulk petroleum, oil and lubricants delivered by pipeline are excluded.

11. When does an item have to be uniquely identified?

Answer: From DFARS 211.274-2, Policy for unique item identification (http://www.acq.osd.mil/dpap/dars/dfars/html/current/211_2.htm#211.274-2):

It is DoD policy that DoD unique item identification, or a DoD recognized unique identification equivalent, is required for—

(1) All delivered items for which the Government's unit acquisition cost is $5,000 or more;
(2) Items for which the Government's unit acquisition cost is less than $5,000, when identified by the requiring activity as serially managed, mission essential, or controlled inventory;
(3) Items for which the Government's unit acquisition cost is less than $5,000, when the requiring activity determines that permanent identification is required; and
(4) Regardless of value—
     (i) Any DoD serially managed subassembly, component, or part embedded within a delivered item; and
     (ii) The parent item (as defined in 252.211-7003(a)) that contains the embedded subassembly, component, or part.

Serially Managed - When DoD elects to serially manage an item it becomes "DoD serially managed".   This means it is a tangible item used by DoD*, which is designated by a DoD, or Service Item Manager* to be uniquely tracked, controlled or managed in maintenance, repair and/or supply by means of its serial number.

Mission Essential/Item Essentiality - A measure of an item's military worth in terms of how its failure (if a replacement is not immediately available) would affect the ability of a weapon system, end item, or organization to perform its intended functions. (DoD 4140.1-R)

Controlled Inventory - Those items that are designated as having characteristics that require that they be identified, accounted for, segregated, or handled in a special manner to ensure their safeguard and integrity. Includes classified items (require protection in the interest of national security), sensitive items (require a high degree of protection and control due to statutory requirements or regulations, such as precious metals; items of high value, highly technical, or hazardous nature; and small arms), and pilferable items (items having a ready resale value or application to personal possession, which are especially subject to theft) (DoD 4140.1-R); and safety controlled items.

12. What is a unique item identifier (UII)?

Answer: A unique item identifier is a string of characters and/or numbers which is globally unique and unambiguous. The string may only contain capital letters, numbers, forward slashes , and dashes. It may not be more than 50 characters in length. The UII is the data sent to the IUID Registry which may not be duplicated on any other item in the DoD inventory past, present or future. The UII can, in some cases, be derived by concatenating a variety of specific data relating to an individual item (e.g. issuing agency code, manufacturer's CAGE code, original part number, and serial number). The UII ensures data integrity and data quality throughout the item's life, and supports multi-faceted business applications and users.

13. What are some examples of a DoD recognized unique identification equivalent?

Answer: Generally, a commercial identifier can be considered for use as a DoD IUID Equivalent if it meets these criteria: (1) Must contain an enterprise identifier, (2) Must uniquely identify an individual item within an enterprise identifier, product or part number, and (3) Must have an existing Data Identifier (DI) or Application Identifier (AI) listed in ANSI MH10.8.2, Data Identifier and Application Identifier Standard. Some examples

of commercial unique item identifiers meeting this criteria that may be recognized as unique identification equivalents, depending on the circumstances, are the Global Individual Asset Identifier (GIAI) for serially-managed assets, the Global Returnable Asset Identifier (GRAI) for returnable assets, and the Vehicle Identification Number (VIN) for vehicles.

14. What are the major differences between the IUID requirement and previously implemented parts marking procedures that basically captured serial number, National Stock Number (NSN), part number, and CAGE Code?

Answer: The major differences between IUID and previous part marking procedures include the following:

1) IUID is globally unique. By incorporating some of the data elements mentioned (e.g., serial number, part number, CAGE Code), in addition to the enterprise identifier, the UII becomes truly unique, and information can be directly associated with each specific item, including acquisition, valuation, logistics, etc.

2) The requirement for marking IUID is the 2D Data Matrix. Most previous procedures have used 1D barcodes or human readable printed information. Along with the 2D Data Matrix, there are new standards for encoding the data into the mark that need to be adhered to.

From a procedural standpoint, the IUID requirement calls for specific information, much of which is already available, to be contained in a different mark. How the mark will be incorporated into processes is up to each enterprise responsible for managing the items.

SCOPE OF IUID POLICY

15. How do, or should, IUID requirements be tailored for classified programs?

Answer: IUID policy applies to classified items. For additional information, please contact the DoD UID Policy Office for direction.

16. Commercial derivative aircraft platforms may only have a limited number of military-unique parts which do require IUID marking; what is the OSD position on marking commercial parts? For example, the TH-57 (legacy platform) utilizes commercial sources of supply and repair. The only exception is for two UHF and VHF radios which are Military unique and are repaired and maintained by Government sources.   Is the IUID requirement applicable to the entire TH-57 inventory of commercial items or does it apply only to the military unique items?

Answer: The IUID policy applies to new items that are delivered to the DoD and also to legacy items in inventory or operational use within the DoD, whether they are military-unique or dual-use items.

17. If COTS parts are identified with a DoD recognized IUID Equivalent code and it is modified to satisfy a DoD requirement can the equivalent code be updated or will it be required to get a DoD IUID? If the equivalent code can be updated, who is responsible to ensure it happens?

Answer: It is not necessary to change a UII if the item is modified. The UII identifies an item, not its state or configuration, therefore the IUID Equivalent would be adequate in both circumstances as long as it met all of the criteria for an equivalent including the ECC 200 Data Matrix.

The owning activity is responsible for IUID marking and implementation.

18. Does IUID apply to existing contracts or Basic Ordering Agreements?

Answer: IUID applies to new solicitations on or after January 1, 2004, not contracts in place on January 1, 2004. The policy memorandum signed by the Acting Under Secretary of Defense (Acquisition, Technology and Logistics) on July 29, 2003 also states "I strongly encourage Component Acquisition Executives to incorporate this policy into ongoing contracts where it makes business sense to do so." So, if the business case justifies it, an ongoing Basic Ordering Agreement (BOA) could be modified, at the discretion of the program/item manager, to require unique identification of those qualifying items being delivered under the BOA.

19. Does IUID apply to consumable material?

Answer: IUID only applies to consumable items if permanent identification is required by the Program Manager (PM) or contract. IUID would most likely not apply to these items.

20. We build assemblies with numerous subassemblies valued over $5,000. Will these subassemblies be required to be traced via the higher assembly?

Answer: If the contract is for procurement of assemblies, the DoD requiring activity will specify which embedded subassemblies are to be marked with the UII. If the contract is for procurement of spare subassemblies, they will be marked with the UII if they meet the qualifying criteria.

21. Can you clarify if the IUID requirements defined in DFARS 211.274 and 252.211-7003 would apply to hardware procured and delivered during a prototype development and acquisition? Application of this clause seems appropriate for the hardware/systems fielded during Phase II but not for prototype hardware procured and delivered under Phase I.

Answer: There is no existing or planned IUID-policy exception for R&D item deliverables. The structure of the R&D contract is the controlling factor for IUID application to item deliverables. If a model, prototype, or development item created as the result of R&D is an IUID-qualifying deliverable in the contract, then it needs to be marked and registered upon delivery to the DoD. If a contract line item number (CLIN) is just for the purchase of research or test results with no tangible item deliverable, then IUID requirements would not apply to that CLIN.

For example, if a CLIN was to deliver a test report for a breadboard design for a missile seeker, then there would be no item delivery associated with that CLIN. If the CLIN was for the test and delivery of a missile seeker, then IUID marking of the seeker would be required at the point it transitioned from a contractor test asset to a DoD asset, that is, it was formally delivered to the DoD.

22. Is a unique item identifier (UII) required on Sets, Kits and Outfits (SKO)?

Answer: Sets, kits and outfits (SKO) are assemblages of components, support items, or mission specific and common tools in a container (bag, pouch, box, chest, van, trailer or shelter) that are used in association. SKOs are primarily designed to accomplish a specific mission or maintenance function. They are identified, cataloged, authorized and issued as a single unit. They may be made up of components, support items and tools included in more than one class of supply; may include end items; may include components, support items and tools for which logistic responsibilities are assigned to more than one agency; and may include nonexpendable, durable, and expendable components, support items and tools. An SKO is an item of supply, configuration controlled by a part number or line identification number.

An SKO should have a UII if it meets the qualifying criteria for tracking and valuation purposes as long as it resides in the inventory. If any of the components of the SKO are DoD serially managed items, they would be uniquely identified separately as embedded items in the parent item. In this case the parent item is the SKO of which the DoD serially managed components are a part. The embedded item would not be separately valued, since the value of the embedded item is capitalized in the value of the SKO.

An SKO could be a set of components for a single assembly part, packaged together as a single part number, for inclusion into one assembly during a maintenance function or configuration change. This type of SKO is most often referred to as a kit. Once the kit is applied to an assembly, the kit is "consumed" and capitalized as part of the value of the assembly in which it is installed; and the UII for the kit would be retired. The assembly in which the kit is installed would become the new parent item for any embedded items from the kit.

23. Is a unique item identifier (UII) required on hand tool sets?

Answer: A hand tool set generally consists of a selection of hand tools, both unpowered and powered, which are placed into a tool storage unit, such as a box, cabinet, or cart; and the assembled set is sold and used as a fixed-in-place or portable integral unit. Hand tool sets can be assembled to meet a variety of end uses, such as mechanic, electrician or pipe fitter's tool sets. For the purposes of unique identification, the tool set (the tool storage unit and its contents) is considered an end item with its own part number. If the tool set meets the qualifying criteria, it will be uniquely identified and will be valued. If any item within the tool set is a DoD serially managed item when considered as a stand alone unit, that item will be uniquely identified; but it will not be valued separately, since its value is included in the value of the complete tool set.

24. Are GSA contracts exempt for IUID requirements?

Answer: The DoD has requested that GSA modify its contract schedules. The DoD expects contract officers to explore early implementation in the interim. Contractors are also encouraged to implement IUID in advance of contractual coverage.

25. Part values change over time and may be different from multiple suppliers. How often do we need to revalue items that may be near the $5,000 threshold?

Answer: Some items vary above and below the $5,000 threshold from contract to contract, so once the item exceeds $5,000 it is recommended that it continue on being marked after that event. Additionally, many of these items may meet the other IUID requirements and would need to be marked in accordance with IUID policy.

FUNDING

26. How will the additional cost of implementing IUID be addressed, specifically for small businesses that supply DoD?

Answer: DoD has determined that it is a strategic imperative that items valued at or above $5,000, or meeting other specified conditions, be marked with unique identification. There are no exceptions. Small businesses will find there are a number of vendors, many of them small businesses, which can provide unique identification marking assistance. DoD considers the cost of implementing unique identification requirements to be an allowable cost under FAR Part 31.

27. Who pays for the equipment and software required to read/scan IUID markings?

Answer: The requiring activity will have to pay for the equipment and software.

28. Is funding being provided to implement this new requirement?

Answer: At the current time there are not additional funds planned for IUID. Funding for IUID would occur at the Component level. Component Acquisition Executives are tasked with determining how to fund IUID in the near term. One possible scenario for implementing IUID with existing budgets would be to reallocate funds from lesser priorities. In negotiating the additional cost to implement IUID with a vendor, it is important to remember that while there may be upfront costs to the vendor to implement IUID, there are also benefits for the vendor, which should be considered when deriving true cost.

For further guidance, the DPAP UID website Policy and Regulations section includes a memorandum entitled "Contract Pricing and Cost Accounting - Compliance with DFARS 252.211-7003 Item Identification and Valuation". Here is an excerpt of the memo: "Costs of non recurring or extraordinary costs that would have not otherwise been incurred shall be separately accumulated as a deferred cost. This deferred cost shall be amortized over a period during which the benefits of the non recurring costs are expected to accrue, but not to exceed 5 years." [PCO and contractor have flexibility to expense these costs…] The DPAP UID website is: www.uniqueid.org

29. What does the DoD hope to achieve by the unique identification of items?

Answer: In terms of achieving the desirable end state of integrated management of items, the collective DoD goal shared by all functional processes involved in property management is to uniquely identify items, while relying to the maximum extent possible on international standards and commercial item markings and not imposing unique Government requirements. Unique identification of items will help achieve:

Integration of item data across DoD, Federal and industry asset management systems, as envisioned by the DoD Business Enterprise Architecture, to include improved data quality and global interoperability and rationalization of systems and infrastructure.

Improved item management and accountability.

Improved asset visibility and life cycle management.

Clean audit opinions on item portions - Property, Plant and Equipment; Inventory; and Operating Materials and Supplies - of DoD financial statements.

CONTRACTING AND VALUATION

30. Is IUID inconsistent with FAR Part 12, Acquisition of Commercial Items or the simplified acquisition threshold?

Answer: IUID is considered to be a strategic imperative, necessary to efficiently move supplies to warfighters. DoD acquires a large number of items under FAR Part 12 contracts. These items cannot be excluded from unique identification requirements. The September 3, 2004 policy memorandum recognized that situations may arise where small businesses and vendors of commercial products are not prepared to comply with DoD IUID requirements within the cost constraints and/or time frames required for product deliveries. Should this occur, DoD requiring activities whose acquisition will be conducted under the regulations in FAR Part 8 or Part 12, may consider implementing a strategy under which the requiring activity would either: (1) coordinate and fund the furnishing of product IUID data plates, labels or other marking media that meets MIL-STD-130 requirements, including durability, to the commercial vendors for application to products before shipment, or (2) contract with third parties to furnish and apply the IUID markings after product delivery from the commercial vendors. This strategy should only be implemented if significant cost or schedule advantages would accrue to the Department and a Determination and Findings has been conducted.

31. Is citing the DFARS clause and the latest version of MIL-STD-130 sufficient to require the hardware vendor to perform IUID implementation, or will specific CLIN, SOW and CDRL language be required as well?

Answer: Because the DFARS is a public document, a citation is most likely enough to create the requirement for IUID; however, contracting activities are encouraged to provide specific wording in their solicitations and contracts. That wording is provided in DFARS 252.211-7003.

32. Should IUID be a separately priced line item?

Answer: If the IUID requirements and DFARS language is properly included in any solicitation issued, there should be no need for a separately priced line item.

33. If an RFQ was received after 1 Jan 04, but does not call out the IUID clause, is it assumed that it should be priced into each proposal before submitting to the customer?

Answer: According to DFARS 211.274-3, all solicitations issued after January 1, 2004 that will result in the delivery of items to the Government will contain the DFARS clause 252.211-7003. If the solicitation does not contain any IUID requirements, but the items to be delivered meet the IUID criteria, the contractor should raise a question to the Government contracting officer/ program manager to determine if the IUID

requirement will apply to the contract (in which case pricing should be provided) or whether a waiver of the DFARS clause will be obtained.

34. If IUID requirements appear in a new contract but were not in the solicitation, what do I do?

Answer: If IUID requirements did not appear in the solicitation but do appear in the contract, the contractor should make sure that the Government POC clarifies which items are to be marked and that the additional cost to mark those items is communicated to the Government POC.

35. What are the contractual requirements for providing IUID for embedded items?

Answer: Subassemblies, components, and parts that are embedded in items that require unique identification will be identified in a Contract Data Requirements List or other exhibit that is cited in paragraph (c)(1)(iii) of the DFARS clause 252.211-7003.

36. Is the program manager responsible for identifying embedded items requiring IUID that are less than $5,000?

Answer: The DFARS 252.211-7003, Item Identification and Valuation, clause requirement, under (c)(1) Unique Item Identification requires (1) The Contractor shall provide unique item identifier for the following:
   (i) All delivered items for which the Government's unit acquisition cost is $5,000 or more; and
   (ii) The following items for which the Government's unit acquisition cost is less than $5,000:_____
   (iii) Subassemblies, components, and parts embedded within delivered items as specified in Attachment Number ___.

The applicable program manager would be responsible for completing these elements of the clause for items less than $5,000 and for embedded items.

37. Will Government solicitations be made under UII numbers instead of part numbers?

Answer: The Unique Item Identifier (UII) is assigned to an individual item upon its delivery to the DoD. The UII number stays with its individual item for the life of the item. So, it will not be possible to ever procure the same UII number again. Solicitations will continue to use part numbers for acquisition of items.

38. Will the embedded subcomponents, component, and parts listed on a CDRL be listed by an identifier, like part number, or by a description of the part? And, if listed by part number, the assumption is that the part number is one that has been agreed upon between DoD and the contractor during the RFP, bidding, contract negotiations processes.

Answer: It will vary with each procurement. In a competitive procurement, it may be impossible for the procuring activity to prepare a list for the solicitation. The offeror may be required to propose a list that reflects the offeror's product. In a sole source reprocurement, the procuring activity may be able to identify items by part number and nomenclature. DoD and the contractor need to work it out bilaterally.

39. What is the acquisition cost of an item?

Answer: Ideally, acquisition cost for items should be recorded at the time these items are received by the Government at the point of receipt. Acquisition cost is defined as the amount, net of both trade and cash discounts, paid for the property, plus transportation costs and other ancillary costs (DoD I 5000.64).

40. How is the acquisition cost of an item valued?

Answer: It is the policy of the Department of Defense that Contractors shall be required to identify the Government's unit acquisition cost (as defined in DFARS 252.211-7003(a)) for all items delivered even if none of the criteria for placing an IUID mark applies.

For fixed price type line, subline, or exhibit line items, the unit acquisition cost is the unit price identified in the contract at the time of delivery.

For cost type contracts [or undefinitized] line, subline, or exhibit line items, the unit acquisition cost is the contractor's estimated fully burdened unit cost to the Government at the time the item is delivered.

For items delivered under a time-and-materials contract, the unit acquisition cost is the contractor's estimated fully burdened unit cost to the Government at the time of delivery.

The Government's unit acquisition cost of subassemblies, components, and parts embedded in delivered items need not be separately identified.

41. Why does the DoD have to establish an item acquisition cost?

Answer: It is essential that contracts contain specific arrangements to capture the acquisition cost of all delivered items because the acquisition cost will form the basis for the entries made in DoD's financial statements and will determine the degree to which those statements comply with the requirements of the Federal Accounting Standards Advisory Board (FASAB). Ideally, acquisition cost for items would be recorded at the time these items are delivered to the Government.

THE MECHANICS OF IUID AND PART MARKING

42. What is a 2D Data Matrix?

Answer: The 2D Data Matrix is a specific type of barcode. It is the symbol that will contain the IUID information about the part. The current version of MIL-STD-130 discusses the use and requirements for 2D Data Matrix. It is different from the linear bar code. An example of an ECC200 Data Matrix is shown below:

43. What is an enterprise?

Answer: An enterprise is the entity responsible for assigning the unique item identifier to an item. An enterprise could be a manufacturer of an item for example. However, if some other organization were responsible for assignment of the UII, then of course the manufacturer would not be the enterprise.

44. What is an enterprise identifier?

Answer: An enterprise identifier is a code uniquely assigned to an enterprise by a registration (or controlling) authority. A CAGE code is one example of an enterprise identifier. There are others. See the Department of Defense Guide to Uniquely Identifying Items for more details.

45. What is a registration controlling authority?

Answer: A registration (or controlling) authority is an organization responsible for assigning a non-repeatable identifier to an enterprise [e.g., Dun & Bradstreet's Data Universal Numbering System (DUNS) Number, Uniform Code Council (UCC)/EAN International (EAN) Company Prefix, Allied Committee 135 Commercial and Government Entity (CAGE) Number, or the Coded Representation of the North American Telecommunication Industry Manufacturers, Suppliers, and Related Service Companies (ANSI T1.220) Number.

46. What is an issuing agency code (IAC)?

Answer: The issuing agency code, or IAC, is assigned by the Registration Authority for ISO/IEC 15459-2, Registration Procedures. The current Registration Authority of ISO/IEC 15459-2 is NEN – Nederlands Normalisatie-instituut. The IAC represents the registration authority that issued the enterprise identifier. The IAC can be derived from the data qualifier for the enterprise identifier and does not need to be marked on the item.

47. How is unique identification achieved within the enterprise?

Answer: Unique identification depends upon a combination of data elements, which is influenced by how the enterprise serializes items. There are two methods of serialization – Construct #1 -- serialization within the enterprise, and Construct 2 -- serialization within the part number.

See the DoD Guide to Uniquely Identifying Items v2.0 at http://www.acq.osd.mil/dpap/UID/attachments/DoDUIDGuide.pdf for additional details on the IUID constructs.

48. What are the issuing agency codes for the enterprise identifiers?

Answer: The issuing agency code is a single digit, or a one letter or two letter combination which identifies the registration controlling authority for an enterprise. The following list gives the issuing agency codes used within IUID.

Issuing Agency Code	Issuing Agency	Enterprise Identifier
0 – 9	GS1 Global Office	GS1 Company Prefix
LB	Telcordia Technologies, Inc	ATIS-0322000

UN	Dun and Bradstreet	DUNS
D	Allied Committee 135	NCAGE/CAGE
LH	European Health Industry Business Communications Council	EHIBCC
LD	Department of Defense	DoDAAC

49. Are the data elements marked on an item for unique identification required to be machine-readable?

Answer: Yes. The UII component data elements, at a minimum, shall be contained in a Data Matrix ECC200 symbol so that an Automatic Identification Technology (AIT) device can be used to read the data elements and construct the UII. Data may be contained in other AIT media (e.g., contact memory buttons, linear bar codes, radio frequency identification, etc.) in addition to the Data Matrix. Where space is available, human readable information for UII data elements should also be marked on the item.

50. Is it permissible to encode additional information, such as Country of Origin, in the Data Matrix symbol if it is desired?

Answer: Business Rule 13 in the DoD Guide to Uniquely Identifying Items v2.0 (http://www.acq.osd.mil/dpap/UID/attachments/DoDUIDGuide.pdf) states:

13. Data elements not required to construct the concatenated UII shall remain discrete but may be contained within the same mark or media as the UII-required elements, provided that (1) all data elements contained in the mark or media are properly identified with a data qualifier, (2) the added data elements do not introduce ambiguity in the concatenation of the UII, and (3) the added data elements do not violate other business rules stated herein. Single data elements that are sufficient to derive UIIs (i.e., 18S, 25S, UID , UST , USN , and DoD recognized IUID equivalents) shall always be interpreted as the UII regardless of any apparent ambiguity introduced by additional data elements in the symbol. The UII data elements should appear first in the sequence.

51. Do data element separators appear in the barcode that is applied to an end item?

Answer: Yes, the data element separators are inherent to the syntax of ISO/IEC 15434. Here is an example of an encoded syntax using MH 10.8.2 Data Identifiers as prefixes to the IUID data elements. This syntax would be encoded as data within the data matrix symbol: Recalling that the unique item identifier is to be concatenated in the order Issuing Agency Code/Enterprise Identifier/Original Part Number/Serial Number for an enterprise that serializes within the part number, the unique item identifier data elements would be encoded as follows using Format 06 for Data Identifiers of the ISO/IEC 15434 syntax:
[)>^R_S06^G_S12V077991289^G_S1P4202435^G_SS10936 ^R_S ^E_O_T

52. Do you need two Data Matrix marks when the current part number changes?

Answer: Current part number is not a required data element for IUID. The current part number may be included in the 2D Data Matrix (but that would require the IUID 2D Data Matrix to be replaced each time the

current part number changed). A second 2D Data Matrix could be added to hold the current part number and other format codes for traceability purposes. Regardless of part number changes, the original UII does not change. So the original Data Matrix must continue to reside on the item, providing the item's unchanging unique identifier information.

53. Should the enterprise encoded in a UII be the product manufacturer or can it be any reseller of the product?

Answer: An enterprise is the entity responsible for assigning unique identification to an asset. For purposes of unique identification, an enterprise identifier will define each entity location that has its own unique, separate, and distinct operation. An enterprise may be an entity such as a manufacturer, supplier, depot, program management office, or a third party.

54. Does a company have to stick with a syntax/semantics format or can it change from DIs to TEIs? If we need permission, whom do we contact? Do we need to flow down the same syntax/semantics to our suppliers that we use? What if they are Construct #1 and we are Construct #2?

Answer: As long as the UII is unique, it does not matter what construct or format indicator is used. The prime contractor is responsible for ensuring uniqueness of all UII delivered to the DoD, including those for items supplied by subcontractors.

55. Is IAC a required part of the IUID string?

Answer: Yes, the IAC, or Issuing Agency Code, is one data element of a set that are concatenated to form the UII. It will be populated in the IUID Registry as part of each item's pedigree data.

56. What if the item is too small to mark?

Answer: For items to small to directly mark or affix a label or data plate, mark the item package per MIL-STD-129 and MIL-STD-130 ("bag and tag").

57. How does the Automatic Identification Technology data capture device put the data elements fields together to define the unique item identifier?

Answer: This is done with software running on the AIT device itself (e.g. barcode scanner) or on a computer to which the AIT device is connected. The software reads all of the information encoded within the barcode by way of the AIT device, and translates the syntax, semantics, and identifying data according to the appropriate international standards observed by IUID policy into the item's UII. This is crucial to the unique item identifier, since the process of identifying and concatenating the data elements must be unambiguous.

58. From a syntax viewpoint, how would the data elements be encoded so they can be machine-read?

Answer: See Appendix D of the DoD Guide to Uniquely Identifying Items v2.0 (http://www.acq.osd.mil/dpap/UID/attachments/DoDUIDGuide.pdf) for multiple examples of encoded IUID data elements.

59. How do you decide where to place data elements for unique identification on items?

Answer: IUID data elements will be placed on qualifying items in accordance with the latest version of MIL-STD-130, Identification Marking of U.S. Military Property. Commercial-off-the-shelf items incorporated into qualifying items will be marked to comply with unique identification requirements.

60. How are the items marked and how is the selection of the IUID location on the item determined?

Answer: Regarding the application of IUID to items, there are a number of methods that can be used, including labels, data plates, and direct part marking (laser, chemical etching, dot-peen, etc).

The application of labels and data plates can also vary, depending on the material of the label and the data plate. Location is usually determined by system engineering staff to ensure that performance is not jeopardized by the placement and type of marking.

How and what methods are used to apply IUID to items is left up to the item vendors. For a large majority of items, there is existing part marking occurring, and compliance with IUID policy will be more a function of adding to or changing the existing processes, rather than introducing a whole new process. For many suppliers, application of labels is incorporated into the manufacturing processes.

STANDARDS

61. How do we manage requirements where the specifications require marking in accordance with something other than MIL-STD-130?

Answer: IUID marking per MIL-STD-130 would be additive to other marking, unless the IUID marking would supplant the need for other marking.

62. Is the IUID requirement in addition to MIL-STD-130 aerospace marking of parts requirements? Is MIL-STD-130 being obsolesced in lieu of the new bar-coding system?

Answer: The IUID requirement is integrated into MIL-STD-130. MIL-STD-130 is not being obsolesced.

TECHNOLOGY

63. What agency/office is responsible for management of the IUID Registry?

Answer: Defense Logistics Information Service (DLIS) hosts the IUID Registry. The DoD UID Policy Office is responsible for defining the elements that will be included in the Registry.

64. What happens if a duplicate UII is entered into the IUID Registry? How does notification of duplicate information get passed to the OEM? Does duplication preclude DD 250 acceptance and payment?

Answer: Duplicates will fail entry. The originator will be notified via automatic error message or via direct contact from an IUID Registry staff member.

65. Can a supplier have access to fielded part usage rates and status so that they can better plan spares needs?

Answer: That information is available from the service databases, not the IUID Registry. Maintenance data is not an existing or planned Registry Pedigree data item.

66. How do we remove items from the system if they are broken and replaced by a new item via a warranty replacement from a vendor [new serial number(s)].

Answer: If the parts were permanently removed from the inventory the UII would be retired, however the item is not deleted from the IUID Registry - its status is changed.

67. A contractor has expressed a desire to IUID all parts, including parts which sub-vendors have already IUID marked. Will this be allowed? This could create a duplicate IUID Registry entry. Could this duplicate Registry entry corrupt the accuracy of the database?

Answer: There is only one UII, and one IUID Registry entry per item. Attempts to enter duplicate entries into the Registry will fail. The prime contractor is responsible for ensuring uniqueness.

68. How will the information systems be changed to help use the data that comes from IUID for improved tracking and accountability once an item is received by a depot or the supply systems? Are there program changes being implemented to all the different DoD stock control systems?

Answer: To date, the DoD UID Policy Office has focused on the policy and guidance for marking items. It will be up to the services and components to determine how to incorporate IUID into their systems and how to best use that information to achieve the desired benefits. There are a handful of programs, such as the CH-47, that have begun implementing IUID, and we hope to capture the lessons learned. The integrated data environment will continue to be a focus for the UID Policy Office.

69. How is the unique item identifier (UII) to be used in automated information systems?

Answer: In the Service or Agency material management and supporting automated information systems (AISs), once the unique item identifier is created from the separate data elements placed on the item, the unique item identifier shall not be parsed to determine the original elements, since parsing and recombination of the elements will invariably result in the introduction of errors in the unique item identifier; however the UII, the enterprise identifier, the serial number and, in the case of Construct #2, the original part number will be captured separately at the time of inspection and acceptance. The unique item identifier

shall be a primary pointer or key data element for traceability in all computational functions including inventory acceptance, item accountability, storage, issue, receipt, valuation, maintenance, and disposal.

70. Are there any requirements for keeping, maintaining, and accessing IUID records/information?

Answer: There are no specific requirements for maintaining IUID information for contractors. It should be noted that the IUID business rules indicate that the UII is permanent for the life of the item, which may create the need and/or benefit of maintaining IUID information long-term. The DoD IUID Registry will maintain unique item identifiers (UIIs) and their corresponding pedigree data.

71.   What measures are in place to protect the information, such as unit price, submitted to the IUID Registry by contractors?

Answer: The IUID information that is provided by contractors to the Government falls under the same requirements for securing procurement and acquisition sensitive data that pertains to contracts now. Also, at award, some contract data becomes public information by law, and other data is accessible with a FOIA request. On a cost type contract, the unit price is considered public information. This does not include information regarding how the unit price was derived, such as overhead rates, etc. This type of supporting data is exempted from FOIA, as is anything that would give competitors an unfair advantage. On a fixed price contract, unit prices are not public information, unless they are also commercially available prices. They are also exempted from FOIA unless they are commercially available catalog prices.

Because the IUID requirement is in the contract, it is subject to the same handling of confidential information as the contract itself. Regarding the IUID Registry, price/cost is considered acquisition information that will only be accessible to registered parties with the appropriate Registry access. Also, the IUID Registry is on the Business Partner Network (BPN), similar to Central Contractor Registration (CCR), which contains contractor information and is mandatory to do business with the Government. The same security of the data will be maintained for the IUID Registry as for other services on the BPN.   As part of the current registration process, Government employees requesting registration are required to complete a non-disclosure form for information they may have access to, and are held accountable to ensure the privacy of the information.

72. Are there any DoD approved Data Matrix readers? Will the hardware and software be universal?

Answer: The DoD does not endorse any specific vendors of materials or services designed to support IUID implementation. The DoD does not approve or certify these service providers - the concern of the DoD is that the marks meet the requirements of the governing standards.

AIM Global, the Association for Automatic Identification and Mobility, includes a number of vendors that provide marking services and products. The AIM Global Buyer's Guide can be queried at: http://www.aimglobal.org/buyersguide/

OUSD (AT&L) has provided the information necessary to define and implement unique item identification. DFARS rules, revisions to MIL-STD-130, and numerous guidance documents have been prepared by the DoD UID Policy Office for implementation of the policy. The ECC 200 Data Matrix is not encumbered by intellectual property provisions and therefore many manufactures can and do produce equipment that will create and read ECC 200 compliant Data Matrices.

Service AIT offices are taking a leadership role in determining common equipment requirements.

73. Are program managers responsible for ensuring that IUID Data Matrix symbols can be read/received at the shipping destinations? In other words, who will be responsible for outfitting the fleet and test community with IUID readers?

Answer: There is currently no requirement for program managers to ensure that IUID data contained in the Data Matrix can be read automatically from the item at the shipping destinations.

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