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**OPINION ON:  
THE COMPREHENSIVE SUBCONTRACTING PLAN  
TEST PROGRAM**

Thank you for the opportunity to express my opinion on the subject of the Comprehensive Subcontracting Plan Test Program, **namely that the program is a sham and its extension will be seriously harmful to vital opportunities for small business to get government contracting work.** I am Professor of Government Contracts at the University of Baltimore Law School and the co-author of GOVERNMENT CONTRACT LAW IN THE TWENTY-FIRST CENTURY (Carolina Academic Press 2012). I was Commissioner in 2008-2011 on the Congressionally chartered, independent Commission on Wartime Contracting., including my 25 participation in televised hearings about procurement and my 3 personal missions to Iraq and Afghanistan. This is solely my opinion and not the opinion of my school or any other institution.

To summarize: the Comprehensive Subcontracting Plan Test Program (CSPTP or "Test Program") (1) reduces vital opportunities for small business; and, (2) has a background of doubt and criticism. CSPTP is seriously harmful to small business. It