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Director, Regulations Management (02REG)
 Department of Veterans Affairs
 810 Vermont Avenue NW, Room 1068
 Washington DC 20420

via FAX 202-273-9026

Goodwill Southern California appreciates the opportunity to submit comments on the proposed rule seeking to implement portions of the Veterans Benefits, Health Care and Information Technology Act of 1006 and Executive Order 13360 (Providing Opportunities for Service-Disabled Veteran Businesses to Increase their Federal Contracting and Subcontracting).

Goodwill Southern California is a nonprofit agency, participating in the AbilityOne Program, providing training and employment opportunities. We provide employment to over 400 workers with severe disabilities, nearly 100 of who are employed through federal service contracts.

We are proud that the AbilityOne Program is available for veterans with service-connected disabilities; our agency is in discussion with the local VA Compensated Work Therapy Program specialists to recruit veterans with service-connected disabilities, and we look forward to all opportunities to expand these efforts.

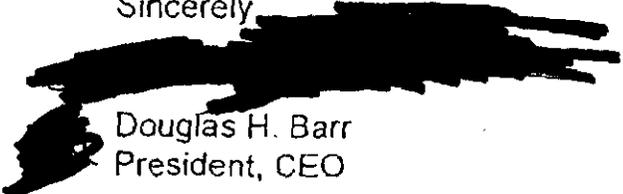
While the goals of the Veterans Benefits, Health Care and Information Technology Act of 1006 and Executive Order 13360 are focused on providing opportunities for service-disabled veteran businesses to increase their federal contracting and subcontracting capacity, we feel this is just one aspect of assisting the service-disabled veteran. It should be balanced to also support those who may prefer employment instead of operating a business. The AbilityOne Program should be the other component in this effort to support our nation's service-disabled veterans.

We urge you to consider NISH's comments in your proposal to amend the VA's Acquisition Regulations:

1. **AbilityOne Program Procurement List Protection.** To ensure legal clarity, we strongly urge VA to add language to clarify that while VA acquisition personnel may provide veteran-owned and service-disabled veteran-owned businesses with priority for new requirements, there should be no "poaching" of AbilityOne Procurement List projects.
2. **Opportunities for Partnership.** NISH believes there is an opportunity to partner with veteran-owned and service-disabled veteran-owned small businesses based on the VA's acknowledgement that a relatively small number of such businesses currently participate in the federal marketplace. Amending the rules to include AbilityOne nonprofit agencies to participate in joint ventures would significantly enhance opportunities for service-disabled veterans.

Thank you for considering these suggestions. We look forward to VA and AbilityOne working together for the maximum benefits of our nation's disabled veterans.

Sincerely,



Douglas H. Barr
President, CEO