



U.S. General Services Administration

Federal Acquisition Service

**PROJECT PLAN  
FOR  
CLOSEOUT OF TRANSITION TO EIS**

**Version 3.0**

**July 25, 2022**

PROGRAM AUTHORITY CONCURRENCE:  
 This document is approved and authorized for public release.

8/1/2022

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7/27/2022

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**Document Change History**

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1.0	March 23, 2020	Initial	Debbie Hren, Joseph Braxton, Bill Kinter
2.0	May 12, 2021	Change progress indicators for Phases 4-5. Update organizational names and roles; update process, agency requirements; add recent documentation as appendices	Debbie Hren, Joseph Braxton, Bill Kinter
3.0	July 25, 2022	Annotated completion of Phases 1-5. Updated to	Joseph Braxton, Debbie Hren

Version	Date	Description	Prepared by
		indicate Continuity of Service project replaces Phases 6 and 7 of this project	

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## 1 Background

General Service Administration's (GSA) Office of Enterprise Technology Solutions (ETS) currently provides mission critical telecommunications and information technology services to government agencies through the current suite of acquisition vehicles: Networx, Washington Interagency Telecommunications System 3 (WITS 3), Regional local service contracts as well as tariff services. With the GSA contracts set to expire, GSA initiated a follow-on acquisition called Enterprise Infrastructure Solutions (EIS) that merges the capabilities of the previous vehicles and meets agency needs for the next generation of telecommunications and networking solutions. The expiring contracts were originally extended to 2020; however, due to delays in transition and requests from agency customers, GSA collaborated with them to determine a need to further extend the contracts to May 2023.

As a condition of extending the expiring contracts, GSA requires agencies to meet certain critical milestones to be eligible to continue using the contracts during the extended period. The first of those milestones was to award all task orders by September 30, 2019. As of February 29, 2020, when this plan was first developed, only 6 agencies had awarded all task orders, and of approximately 120 solicitations expected to be used for task order awards, fewer than half had been submitted to GSA for scope review. As of February 28, 2021, the number of solicitations expected had increased to 212, and 33 of 99 agencies had awarded all task orders. This delay in completing the acquisition phase of transition created significant risk that agencies cannot disconnect their services from the expiring contracts by the target deadline of September 30, 2022.

To mitigate this risk and to enforce the eligibility condition for the extension of the expiring contracts, GSA initiated this Transition Closeout project. The goal of this project is to ensure all services are disconnected from the expiring contracts by May 2023.

UPDATE FOR 2022: In February 2022 GSA announced a new project to provide agencies an additional twelve months—between June 1, 2023 and May 31, 2024—to transition off of the expiring contracts. This "Continuity of Service" project rendered the Limiting Users activity of the Transition Closeout project as no longer necessary; in effect, Phases 6 and 7 of "Limiting Users on Extended Contracts" were replaced by the Continuity of Service project.

## 2 Objectives

GSA is implementing this Closeout Project to complete the disconnection of services from the expiring contracts in a phased approach. This approach is intended to achieve the following objectives:

- Avoid a large-scale disruption in telecom and networking services across the Federal Government at the expiration of the contracts
- Minimize the risk of adverse impacts to agencies' operations
- Reduce the expense of administering the expiring contracts simultaneously with the EIS contracts

- Provide adequately progressing agencies that have substantiated needs with contracts on which to continue services without interruption through May 2023
- Decrease and stop the growth of services on expiring contracts that would only add services that then have to be transitioned.

### **3 GSA's Action Plan**

GSA is taking a twofold approach to implementing this plan. GSA is enforcing the requirement to limit use of the extended contracts to those agencies who are meeting certain critical milestones to be eligible to continue using the contracts. In addition, GSA is taking steps to minimize the growth of services on the extended contracts, which would increase what has to be transitioned, by freezing contract modifications and orders for new services. An overview is below, and detailed processes are described later in this plan.

#### **3.1 Limiting Users on Extended Contracts**

Beginning March 31, 2020, GSA is implementing this plan to limit users on the expiring contracts. The first step was to limit users to those that had active services, on the date the extension for each respective contract was executed. For Networkx Universal contracts, this was effective on April 1, 2020; effective dates of the remaining 89 contracts vary according to each contract's term. After that limiting users involves GSA's ordering a gradual disconnection of services for agencies that have not made adequate progress in the transition to EIS. This is accomplished through a series of targeted warning notices to agencies, after which they have the opportunity to appeal not to be removed.

If the appeal is not granted, GSA subsequently notifies Networkx, WITS 3, and Regional local service contractors of agencies that are removed from the Networks Authorized User List (NAUL), which specifies the agencies authorized by GSA to use the extended contracts (see Section H.2.3.a and b of those contracts). The contractors must then disconnect services for the agencies removed and cease billing per the terms and conditions of those contracts.

GSA conducts the removal of authorized users in phases. GSA determines the phasing based on the agency's completion of awarded task orders on EIS, other indications of activity, and progress in transition, along with considering other special circumstances. NOTE: The agencies are tracked and specified on the NAUL at the level as defined in the Transition Entity list; generally, that is the department level for most large agencies, and Native American Tribes are treated individually. Most agencies' disconnects will be completed no later than September 30, 2022.

#### **3.2 Freezing Contract Modifications and Orders**

Effective October 1, 2020, GSA implemented controls on its extended Networkx, WITS 3, and Regional local service contracts by freezing all future growth on these vehicles. Specifically, on the Networkx (Universal and Enterprise) and WITS 3 contracts, GSA ceased processing all contract modifications for new requirements. This control refers to modifications to the GSA











contracts, not to agencies' task orders. For GSA's Regional local service contracts and tariffs, GSA no longer fulfills any requests for additional services. All new services required should be provided under the EIS contracts.

GSA understands that in very rare cases, an agency may have a need that requires GSA to modify the extended contracts. To request a modification exception after the October 1, 2020 restriction date, the Agency Transition Sponsor (ATS) must provide the justification and required timeframe for the new requirement to the Senior Executive for ETS with cc: [ots.mod.waivers@gsa.gov](mailto:ots.mod.waivers@gsa.gov). The justification should include why the requirement cannot be fulfilled under EIS. GSA will review and adjudicate the exception request. If approved, the agency must provide a copy of the approval letter to the contractor for submission with the modification to GSA. Note that agencies removed from the NAUL will be prohibited from requesting any modifications on extended contracts.

Effective October 1, 2021, GSA will no longer accept or process any **exception requests** for its expiring contracts. Specifically, GSA will no longer process any contract modifications on the Networx and WITS 3 contracts or process any new service order requests on the Regional local service contracts or tariff accounts. On January 27, 2021, the Deputy Assistant Commissioner for Category Management sent an email to all agencies informing them of this new restriction (see Appendix E: Email Eliminating Exceptions to Mod Freeze).

#### **4 Transition Closeout Project Schedule**

Consistent with the schedule for the EIS Transition program, the Closeout Project will follow the schedule below.

Task Name	2015	2016	2017	2018	2019	2020	2021	2022	2023
CIOs deliver Transition Plans to ITS*		 10/31							
Agencies Issue Solicitations to Industry*			 3/29						
Agencies award EIS task orders*					 9/30				
Disconnect Agencies Removed from Authorized Users List						 In Phases			7/2020-8/2022
Freeze Network and WITS Mods and LSA Orders						 10/1			
Transition 50% complete*						 3/31			
Transition 90% complete*							 3/31		
Transition 100% complete (disconnects)*								 9/30	
Network Extension 2						 5/31			
WITS & LSA Extension 2						 5/31			

\*measured and reported monthly.

LSA = Local Service Agreement, another term used to describe Regional local service contracts

## 5 Limiting Users on Extended Contracts

GSA asked agencies to sign written agreements in which the agencies committed to award their task orders by September 30, 2019. In a subsequent memorandum dated July 15, 2019 the Assistant Commissioner for ITC approved the “Plan for Limiting Users on Extended Contracts,” outlining the approach for enforcing agencies to meet certain critical milestones to be eligible to use the extended contracts (see Appendix C: Memorandum - Plan for Limiting Users on Extended Contracts July 2019). On March 11, 2020, the Assistant Commissioner for ITC sent a letter to all ATSS, LTMs, and TOCOs informing them of this approach (see Appendix D: Letter to Agency Transition Sponsors from AC ITC, 2020). Subsequently ITC published version 1.0 of a detailed plan for implementing the approach and shared this Project Plan for Closeout of Transition to EIS, dated March 23, 2020 with agency customers, industry partners, and the public.

In April 2021, due to multiple agencies failing to make adequate progress in the areas of releasing to industry all planned solicitations, completing disconnects when not using EIS, and making task order awards, ITC proposed revising phases 4 and 5 from the original plan to better enforce limiting the use of the extended contracts. On April 27, 2021 the Assistant Commissioner for ITC wrote a follow-on memorandum (see Appendix F: Memorandum - Plan for Limiting Users on Extended Contracts April 2021) presenting the revised path forward for enforcing the condition for the remaining time left on the expiring contracts and subsequently communicated this approach in a letter to all ATSS, LTMs, and TOCOs as well as GSA’s Regional Commissioners (see Appendix G: Letter to Agency Transition Sponsors from AC ITC, 2021).



Below are the phases and schedule for implementing and completing the approved approach for limiting the use of extended contracts.

### 5.1 Updated Phases and Target Disconnect Dates

GSA will identify agencies for each phase of removal from the NAUL based on each agency's status as defined by the progress indicators in the table below. GSA reserves the right to revisit the requirements for subsequent phases and refine the plan based on agencies' progress to further ensure timely completion of all milestones.

Phase	Progress Indicator	Target Disconnect Dates
1	Non-responsive agencies--COMPLETE	Apr-Jul 2020
2	Agencies with no solicitations submitted for scope review and agencies indicating they will not transition services to EIS--COMPLETE	Sep 2020
3	Agencies with no solicitations released to industry--COMPLETE	Mar 2021
4A	Agencies that are: Disconnect only--not moving to EIS or Price only--not awarded--COMPLETE	Jun 2021
4B	Agencies with no solicitations awarded--COMPLETE	Aug 2021
5	Agencies that have not awarded all planned solicitations--COMPLETE	Sep 2021
6	Agencies with solicitations awarded but experiencing contractor-delayed installations and disconnects	No longer planned
7	Agencies with task orders awarded but services not expected to cut-over by September 2022. This is the Emergency Action Period (EAP)	No longer planned

### 5.2 Process for Limiting Users

This section describes the general process for phases 1-6 to limit and disconnect users. See Appendix B: Process Flow for Limiting Users 2021 for a graphical depiction. Note that throughout the process, GSA conducts continual outreach to affected agencies, at both the working level and executive levels, for due diligence in ensuring awareness and assessing risk.

- 1) Limiting Use Transition Project Manager (LUTPM) and Transition Inventory (TI) Lead generate a proposed revision to the NAUL for agencies to be considered for the next phase. The revision will be a NAUL Workbook containing three worksheets:
  - a. Cover Sheet: containing title, version, date, document purpose statement and signature block for the authorizing GSA official.
  - b. NAUL: containing AB Codes, Agency Names, Sub-Agency Names and Active Service Instance Records (SIRs).
  - c. Removed Agencies List: containing agencies for removal from the NAUL.
- 2) LUTPM convenes a meeting of the Closeout Core Team to review and come to consensus on criteria for each phase and agencies to be removed from NAUL for each phase. LUTPM documents discussion, factors for each agency's inclusion in the phase, and decisions. For example, an agency which GSA has recently approved a modification exception request should be given strong consideration NOT to be removed from the NAUL.
- 3) LUTPM routes proposed revised NAUL Workbook as recommendation to Senior Executive for ETS for approval.
- 4) Senior Executive for ETS concurs and forwards to Director, IT Acquisition Operations to share with Contracting Officers (COs) and, for awareness, cc: Deputy Assistant Commissioner for Acquisition, all Division Directors in ETS, and all members of the Closeout Core Team.
- 5) COs send proposed revised NAUL Workbook to contractors, allowing them to prepare and offer feedback on agencies to be removed, should the contractors be aware of relevant circumstances GSA may not be aware of. The TI Lead will provide a summary spreadsheet of active inventory for each agency, specific to each contractor, giving contractors a chance to identify any major discrepancies or jeopardies back to TI Lead and LUTPM.
  - 5a) Contractors provide feedback on removed agencies and inventory issues.
  - 5b) Closeout Core Team revisit agency status to determine if phase criteria have recently been met.
- 6) LUTPM prepares warning letters for agencies to be removed from the NAUL and routes to Senior Executive for ETS for signature and transmittal to ATS, cc: LTM and TOCO. Warning letters will include a summarized list of active services and SIR counts for each service.
- 7) Agencies will have two weeks to reply to warning letters with an appeal explaining why they should not be removed from the NAUL. The Senior Executive for ETS will review and adjudicate appeals. LUTPM will document appeal and results for the record.
  - 7a) LUTPM drafts the Phase Decision Matrix to capture Closeout Core Teams' decision for approval of agencies' submitted appeals and/or response.
  - 7b) Closeout Core Team meets to complete the Decision Matrix.
  - 7c) LUTPM brief the final Decision Matrix to Senior Executive for ETS for approval of Closeout Core Teams' recommendation for appeals.
  - 7d) LUTPM draft appeal response letters for signature.
- 8) LUTPM works with the Business Management Division to determine the need for and prepare a draft companion letter to accompany the NAUL Workbook.

- 9) LUTPM makes any updates to the revised NAUL Workbook and routes revised NAUL Workbook as recommendation to Senior Executive for ETS.
- 10) Senior Executive for ETS signs the NAUL Workbook electronically on Cover Sheet within the NAUL Workbook and delivers revised NAUL Workbook to Director, Business Management for:
  - a. Forwarding to Contracting for transmittal to contractors
  - b. Forwarding to the GSA Regional Local Service managers
  - c. Providing copies to the Director, IT Acquisition Operations, Deputy Assistant Commissioner for Acquisition, ETS Division Directors, and members of Closeout Core Team.
- 11) Contractors assign POC for tracking disconnects and responding to GSA TI Lead and LUTPM.
- 12) Contractor POC confirms receipt, processes disconnects and submission of final invoice.
- 13) Order Writing Center initiates disconnects for Regional local services and Networx and WITS 3 contractors disconnect services for removed agencies.
- 14) TI Lead tracks and reports disconnect status and confirms when Transition Inventory shows removed agencies are 100% disconnected and billing has ended.
- 15) TI Lead determines TI shows 100% disconnected and no billing.

## **6 Freezing Contract Modifications and Orders**

To stem the growth of the inventory that needs to be transitioned to EIS, GSA implemented a freeze effective October 1, 2020 on contract modifications on Networx and WITS and new orders on Regional local service contracts.

### **6.1 Initial Conditions**

Once agencies are removed from the NAUL, GSA will not process any modifications or service orders, and their existing services will be disconnected.

### **6.2 Process for Freezing Modifications and Orders**

This applies only to modifications and orders submitted after October 1, 2020 but before October 1, 2021. After that date, GSA will not allow any exceptions.

- 1) To receive an exception, the ATS must address a request to the Senior Executive for ETS with a copy to [ots.mod.waivers@gsa.gov](mailto:ots.mod.waivers@gsa.gov). The request must include:
  - a. Description of the specific, urgent requirement with services/capability needed and locations/agency components involved
  - b. Required dates of service
  - c. Reasons EIS cannot satisfy the requirement
  - d. Acknowledgement that it's the agency's responsibility to share with the contractor so that the contractor does not spend time developing a modification that won't be approved.

- 2) The Modification Exception Team will review the request and make a recommendation to approve or disapprove to the Senior Executive for ETS. The review and recommendation will be based on factors such as:
  - a. The agency's status on the NAUL
  - b. Can the requirement not be fulfilled on EIS?
  - c. Is it operationally critical and cannot be delayed without mission degradation (impact is more than added cost and/or administrative burden)?
  - d. If answers to all questions above are "yes," recommend "Approve." If any answer is "no," recommend "Deny."
- 3) The Modification Exception Team forwards the draft recommended response letter with justification to Senior Executive for ETS.
- 4) Senior Executive for ETS reviews, accepts or changes recommendation, and sends to IT Category Management (QT3) for concurrence.
- 5) QT3 concurs and sends to ITC for approval and signature of the letter.
- 6) ITC returns the signed exception response letter to Senior Executive for ETS for distribution.
- 7) Senior Executive for ETS e-mails the letter to the requesting ATS with copy to Business Management Division.
- 8) The Modification Exception Team records the decision and ensures all GSA stakeholders are aware of the approved exception.
- 9) If approved, the agency is responsible for providing the approved letter to its contractor for submission with each modification(s) in the NHC.
- 10) If disapproved, the contractor will not have a letter to submit with the modification(s), and the CORs will reject any modifications the contractor submits.

## **7 Rollout Plan & Notifications**

A separate document details the communications plan for the announcement to freeze new services and limit use of contract extensions to external audiences. A summary of the communications plan for this project appears below.

### **7.1 Letters to Agency Transition Sponsors**

The Assistant Commissioner for ITC sent a letter on March 11, 2020 to ATSs with copies to LTMs and TOCOs announcing GSA's approach to limiting users, freezing mods and orders, and the exception process. A copy of this letter is in Appendix D: Letter to Agency Transition Sponsors from AC ITC, 2020.

Subsequently, for this revised plan, the Assistant Commissioner for ITC sent a letter dated May 11, 2021 to ATS, cc: LTM and TOCO explaining the changes to the closeout project. GSA provided a copy to all stakeholders, including contractors and GSA's Regional Commissioners. See Appendix G: Letter to Agency Transition Sponsors from AC ITC, 2021.

## 7.2 Draft NAUL Workbook and Companion Letter

The contracting officers sent their respective contractors a draft NAUL Workbook and a companion letter that explains:

- 1) After April 1, 2020, Networx Universal mods will be processed only for agencies on the NAUL.
- 2) After May 31, 2020, Networx Enterprise and WITS 3, mods will be processed only for agencies on the NAUL.
- 3) After October 1, 2020 for agencies who remain on the NAUL, no mods will be processed without an approved exception letter, which must accompany modification submission to the NHC. The agency is responsible for providing an approved exception letter to the contractor to accompany the modification.

## 7.3 Public Notification

Notification to the public is accomplished through updates to the Networx, WITS 3, EIS, and Local Telecommunications websites and addition to the EIS Transition website.

## 7.4 Congressional Notification

GSA included a description of the NAUL process in responses to Questions for the Record from the House Committee on Government Reform from a March 4, 2020 hearing.

## 8 Roles and Responsibilities

The table below identifies stakeholders and their roles and responsibilities that contribute to the successful implementation of the Closeout Project.

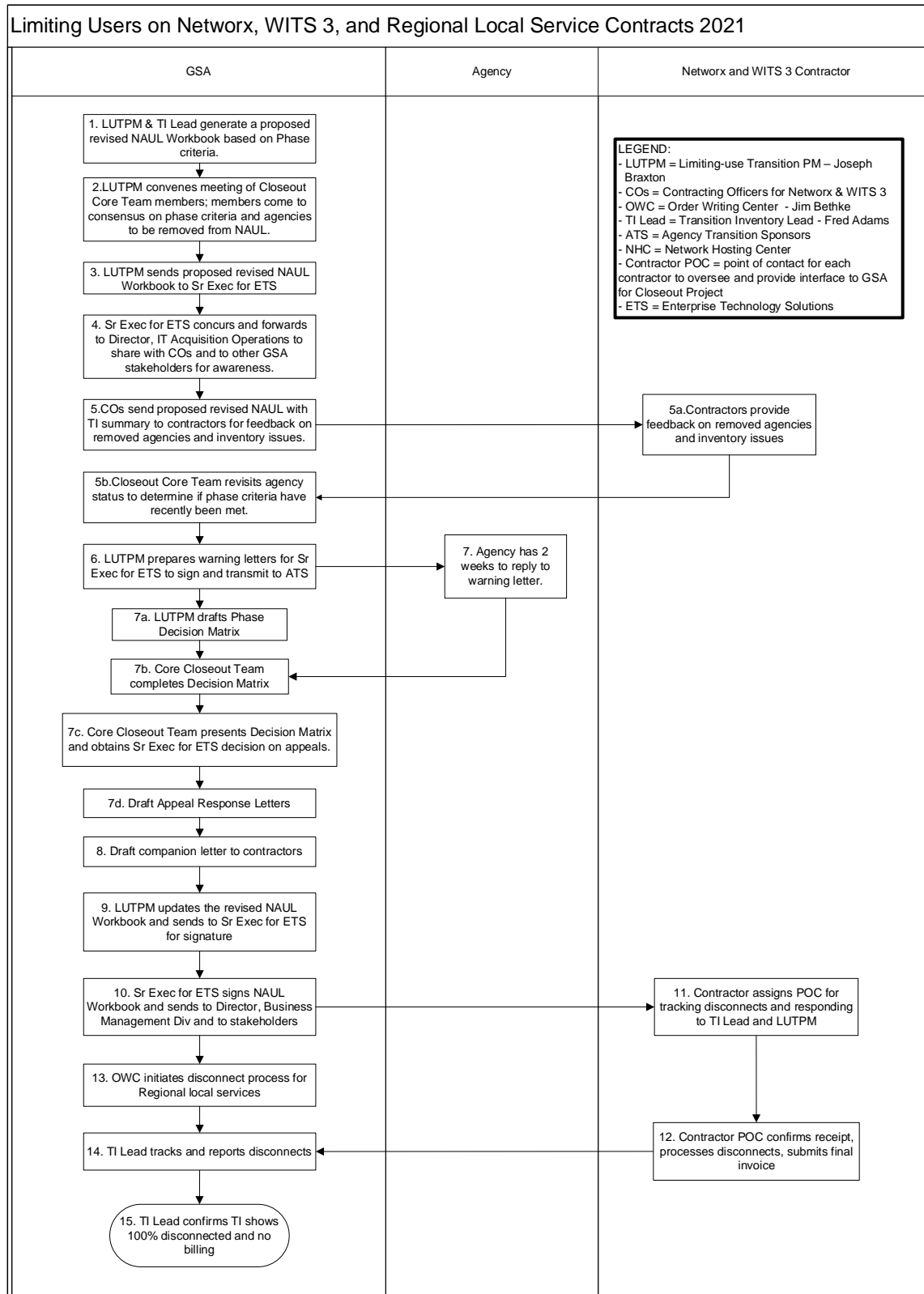
Stakeholders	Responsibility
GSA Executives	Review, concur, and approve requests.
Senior Executive for Enterprise Technology Solutions	Designate GSA personnel for the Closeout Core Team. Adjudicate modification exception requests from agencies, inform GSA stakeholders and executives of decisions, and email response to requesting agencies. Adjudicate NAUL recommendations, inform GSA stakeholders, sign warning letters, adjudicate NAUL removal appeals, and sign the NAUL.
Director, IT Acquisition Operations	Receive a copy of the proposed revised NAUL.
GSA Contracting Officers for Networx and WITS 3	Send contractors the proposed and revised NAUL Workbook; include a companion letter.
Transition Program Director	Continue to manage Transition Program: track progress, identify and mitigate risks, initiate escalations as needed.

Stakeholders	Responsibility
Business Management Division	Enforce freeze on mods and new services and administer the exception process. Write a companion letter to contractors for NAUL if needed.
Limiting Use Transition PM	Administer the NAUL process: Identify agencies to remove from NAUL; prepare warning letter to agencies proposed to be removed from NAUL; send signed warning letter.
Closeout Core Team	Come to consensus on criteria for each phase and agencies to be removed from NAUL in each phase.
TI Lead	Create TI Summary by contractor, by service. Track and report disconnects.
Order Writing Center	Initiate Regional local service disconnect process.
Service Delivery	Enforce freeze on Regional local service orders.
CORs	Process only modifications with an approved exception, monitor contractor performance, identify and mitigate risks, initiate escalations as needed.
Solution Brokers	Identify assigned agencies as non-responsive and provide history. Communicate plans and timelines with assigned agencies.
Technology Service Manager	Identify assigned agencies as non-responsive and provide history. Communicate plans and timelines with assigned agencies.
Agency Transition Sponsor	Receive and respond to warning letters. Submit exception requests for mods.
Network and WITS 3 Contractors	Provide feedback to GSA on agencies to be removed from NAUL and TI discrepancies. Disconnect agencies removed from NAUL.
Regional Local Service contractors	Comply with GSA's requests for disconnects.
Other GSA Branch Chiefs	Remain aware of project activities, inform respective branch personnel, and respond according to organizational roles.

**Appendix A. Acronyms**

<b>AC</b>	Assistant Commissioner
<b>ATS</b>	Agency Transition Sponsor
<b>BMD</b>	Business Management Division
<b>CIO</b>	Chief Information Officer
<b>COR</b>	Contract Officer Representative
<b>EIS</b>	Enterprise Infrastructure Solutions
<b>ETS</b>	Enterprise Technology Solutions
<b>FAS</b>	Federal Acquisition Service
<b>FO</b>	Fair Opportunity
<b>GSA</b>	General Services Administration
<b>IT</b>	Information Technology
<b>ITC</b>	Office of Information Technology Category
<b>LTM</b>	Lead Transition Manager
<b>LUTPM</b>	Limiting Users Transition Project Manager
<b>NAUL</b>	Networks Authorized User List
<b>NHC</b>	Network Hosting Center
<b>POC</b>	Point of Contact
<b>TI</b>	Transition Inventory
<b>TO</b>	Task Order
<b>TOCO</b>	Transition Ordering Contracting Officer
<b>TCC</b>	Transition Coordination Center
<b>WITS</b>	Washington Interagency Telecommunications System

**Appendix B. Process Flow for Limiting Users 2021**





## Appendix C. Memorandum - Plan for Limiting Users on Extended Contracts July 2019



July 15, 2019

MEMORANDUM FOR: Alan B. Thomas, Jr.  
Commissioner  
Federal Acquisition Service

FROM: William Zielinski *William Zielinski*  
Assistant Commissioner, Information Technology Category  
Federal Acquisition Service, GSA

SUBJECT: Plan for Limiting Users on Extended Contracts

As a condition of extending the expiring Network, Washington Interagency Telecommunications System (WITS) 3, and Local Services contracts, GSA will require agencies to meet certain critical milestones in order to be eligible for an extension. This memorandum outlines the plan for enforcing the condition.

The Office of Information Technology Category (ITC) is making the Federal Acquisition Service (FAS) Commissioner formally aware of this extension plan in advance of communication to customer agencies as well as to the affected contractors.

GSA has sent agencies written agreements to sign, committing to award their task orders by September 30, 2019. Further, these agreements inform the agencies that administrative fees on the expiring contracts may increase; and processing contract modifications and new service orders on the expiring contracts may be curtailed during the extended time period.

To enforce this condition, ITC will include the following language in the extended contracts:

*Beginning at a time to be determined after March 31, 2020, GSA will begin ordering a gradual disconnection of services for agencies that have not made adequate progress in the transition to EIS. This will be accomplished through a series of targeted warning notices to agencies and subsequent disconnect orders from GSA to Network, WITS 3, and local service contractors. The contractor shall have all disconnect orders completed by the dates identified in the disconnect orders and cease billing effective as of those dates.*

*GSA intends to conduct the disconnects in phases. GSA will determine the phasing based on the following: the agency's completion of task order awards on EIS, other indications of activity and progress in transition, along with considering other special circumstances as outlined in the attached Addendum. Most agencies' disconnects shall be completed no later than September 30, 2022. GSA may approve, under extreme*

*circumstances, a few specific agencies to extend the use of the contract through an "Emergency Action Period" with disconnects to be completed by May 31, 2023.*

*During the contract extension process, GSA will present the contractor with a list of agencies that may be limited in their use of the extended contract according to the process described above. GSA will indicate whether the agency has awarded its EIS task orders and how many active services remain on the contract.*

GSA will implement the enforcement according to the plan outlined in the attached addendum. If you have any questions, please contact Allen Hill, Director of the Office of Telecommunications Services at [allen.hill@gsa.gov](mailto:allen.hill@gsa.gov) or 202-701-7891.

**ATTACHMENT 1:** Addendum: Detailed Objectives and Approach for Extension Plan

**Addendum: Detailed Objectives and Approach for Extension Plan****a) Objectives**

- i) Limit the use of extended contracts to agencies demonstrating progress on transition to EIS
- ii) Avoid a large-scale disruption in telecom and networking services across the Federal Government at the expiration of the Network and LSA contracts
- iii) Minimize the risk of adverse impacts to Agencies' operations
- iv) Reduce the expense of administering the extended expiring contracts (Network, WITS 3, and LSAs) simultaneously with the EIS contracts
- v) Disconnect agencies, in phases, to meet September 30, 2022 milestone for 100% completion of transition
- vi) Authorize a limited number of agencies for Emergency Action Period, October 2022 through May 2023
- vii) Assist a small number of agencies with sole-source task order on EIS, May 2023 through definitive end date

**b) Approach**

- i) Track each agency's progress on:
  - 1) Submitting solicitations for GSA scope review
  - 2) Releasing solicitations to Industry for proposal
  - 3) Awarding task orders by September 30, 2019
  - 4) Impacts and special circumstances due to factors such as, but not limited to, 1) protest, 2) lacking Authority to Operate, 3) lapse in appropriations or government shutdown, 4) GSA-Assisted acquisitions for small agencies, and 5) EIS contract modifications
- ii) Confirm agency's situation, contracts, and inventory and put into phases, such as:
  - P1. Services with no identifiable owner and non-responsive agencies
  - P2. No solicitations submitted for scope review
  - P3. No solicitations released to Industry
  - P4. Solicitations released but not awarded, no protest
  - P5. Solicitations released but under protest
  - P6. Contractor-delayed installs and disconnects
  - P7. Task orders awarded but services not expected to cutover by May 2023
- iii) Warning letter to agency
- iv) Disconnect "order" letter to contractors
  - 1) Date of first phase of disconnect orders is TBD, date of last phase is August 2022
  - 2) 30 days to disconnect
  - 3) No billing after disconnect
- v) Emergency Action Period
  - 1) GSA invites agency to submit request
  - 2) Request to GSA from Agency Transition Sponsor by March 2022

- 3) At least 30 days prior to the expiration of each extended contract, each Contracting Officer will issue a contract modification that 1) invokes the extension under Clause 52.217-8 Option to Extend Services and 2) modifies Clause H.2 with the new list of authorized users
- vi) Sole Source Transition
  - 1) Agency will prepare and approve sole source justification and award short-term task order to temporarily move services from expiring contract to same service provider's EIS contract, if this is a possibility
  - 2) Agency subsequently completes transition to EIS provider previously selected through Fair Opportunity process
  - 3) GSA will assist, but the agency will be solely responsible for justification and task order acquisition

**Appendix D. Letter to Agency Transition Sponsors from AC ITC, 2020**

GSA Federal Acquisition Service

March 11, 2020

Dear Agency Transition Sponsor:

Enterprise Infrastructure Solutions (EIS), the General Services Administration's (GSA's) 15-year, \$50 billion contract vehicle, was designed to help meet agency mission needs by providing customer agencies with secure, resilient, cost-effective, innovative, and high-quality telecommunications solutions. The Federal Government is currently in the middle of the transition from the expiring Networkx, Washington Interagency Telecommunications System (WITS) 3, and Regional Local Service Agreement (LSA) contracts to the EIS contracts. This letter provides EIS Agency Transition Sponsors with an update on the actions GSA is taking to help ensure a timely and effective transition of all inventory from these expiring contracts onto EIS.

The expiring Networkx, WITS 3, and Regional LSA contracts were originally extended to 2020. As a result of delays in transition to the EIS contracts and requests from agencies, GSA is extending the expiring contracts by an additional three years to May 2023. These extensions allow the necessary time for agencies to complete transition and modernize.

In order for an agency to be eligible to continue using the contracts during the extension period, each agency must agree to meet certain critical milestones or GSA will take steps to limit the use of the extended contracts. GSA is also taking steps to curtail the growth of services on the extended contracts by freezing modifications while deploying resources to process EIS modifications for agencies awaiting solicitation award. Additionally, GSA intends to refocus its direct contractor-provided transition support to agencies.

**Limiting Use of Extended Contracts**

On March 31, 2020, GSA will begin to limit the use of its extended contracts for agencies that are not making progress towards transition. While the deadline for agencies to award task orders was September 30, 2019, GSA continues to monitor all transition activities that indicate progress, including solicitation release, task order awards, and disconnection of services from the extended contracts.

After March 31, 2020, GSA will disconnect agencies, in phases, to meet the September 30, 2022 milestone for 100% completion of transition. The first phase will include agencies that have been "non-responsive" to transition outreach from GSA. Future phases will be based on each agency's status at that time and the individual circumstances impacting that agency's transition progress, such as protests or pending contract modifications. The Agency Transition Sponsor will receive a notification before any services are disconnected, and there will be an opportunity for appeal.

**Freezing Modifications on Extended Contracts**

Effective October 1, 2020, GSA will implement controls on its extended Networkx, WITS 3, and LSA contracts by freezing all future growth on these vehicles. Specifically, on the Networkx (Universal and Enterprise) and WITS 3 contracts, GSA will cease processing all contract modifications for new requirements. This control refers to modifications to the GSA contracts, not to agencies' task orders. For GSA's Full Service Program, including the LSA contracts, GSA

U.S. General Services Administration  
1800 F Street, NW  
Washington, DC 20405  
[www.gsa.gov](http://www.gsa.gov)

will no longer fulfill any requests for additional services. All new services required by your agency should be provided under the EIS contracts.

GSA understands that in very rare cases, an agency may have a need that requires GSA to modify the extended contracts. To request a modification exception after the October 1, 2020 restriction date, the Agency Transition Sponsor may provide the justification and required time-frame for the new requirement to Mr. Allen Hill, GSA's Executive Director of the Office of Telecommunications Services. The justification should include why the requirement cannot be fulfilled under EIS. GSA will review and adjudicate your exception request.

#### **Modifications on EIS Contracts**

As the transition off extended contracts progresses, the quantity of EIS modifications will continue to grow. GSA recognizes that many agencies have released their solicitations to the EIS suppliers and are waiting for contract modifications related to their solicitations to be evaluated and awarded by GSA. GSA is prioritizing modifications needed for agency awards. At the same time, the Networx contracts are on pace to process approximately 2,000 contract modifications in this fiscal year with the same GSA resources. These variables are driving the need to initiate the freeze of modifications on the extended contracts.

#### **Contractor-Provided Transition Support**

GSA will refocus direct contractor-provided transition support. As originally planned for October 1, 2020, GSA will no longer provide agencies with support for EIS solicitation development/evaluation and post-award transition through the Transition Ordering Assistance Task Order. Agencies are encouraged to perform this work for Fiscal Year 2021 using other agency contract vehicles or in-house resources. As an alternative, GSA is exploring the means to provide more technical engineering assistance for network, voice, and cloud transition, and will continue to communicate with agencies as the approach develops.

If you have any questions or concerns, please contact Allen Hill, Executive Director, GSA's Office of Telecommunications Services at [allen.hill@gsa.gov](mailto:allen.hill@gsa.gov) or (202) 701-7891.

Sincerely,



William Zielinski  
Assistant Commissioner  
Information Technology Category, Federal Acquisition Service

cc: Lead Transition Manager and Transition Ordering Contracting Officer

## Appendix E. Email Eliminating Exceptions to Mod Freeze

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Information Technology Category  
Federal Acquisition Service

January 27, 2021

Dear Agency Executive Transition Sponsor:

This letter provides you with an update on the transition to GSA's Enterprise Infrastructure Solutions (EIS) contracts, the associated actions GSA is taking to help ensure a timely and effective close-out of the expiring Networkx, Washington Interagency Telecommunications System (WITS) 3, and Regional Local Service Agreement (LSA) contracts, and information on alternatives your agency should consider now to manage the risk of missing critical transition milestones.

We recognize that each agency is at a different stage in their transition; however, we wanted to ensure the information provided below is available to all of our agency partners.

### Transition Update

With the legacy contracts expiring on May 31, 2023, the Federal Government has less than three years to transition and disconnect expiring services. At the current disconnect rate, the government is not on track to meet the September 2022 milestone for 100% disconnection of expiring services. This situation creates a very real risk of disruptions to operations and the delivery of critical services to the public.

At the request of the Infrastructure Advisory Group, GSA extended the expiring Networkx, WITS 3, and LSA contracts to May 31, 2023. These extensions allow the necessary time for agencies to complete transition and modernize. During the extension period, critical milestones have been widely publicized and agencies have been notified that failure to meet these milestones could make them ineligible to continue using the extended contracts<sup>1</sup>. GSA is implementing its phased process for limiting the use of the extended contracts. GSA also took steps to curtail the growth of services on the extended contracts by freezing Networkx and WITS modifications and LSA orders, and redirecting resources to process EIS modifications for agencies with pending task order awards. Only contract modifications and LSA orders with an approved exception are currently being processed.

### Exceptions Will Cease on Expiring Contracts

Effective October 1, 2021, GSA will no longer accept or process any exception requests for its expiring contracts. Specifically, GSA will no longer process any contract modifications for new services on the Networkx and WITS 3 contracts. This control refers to modifications to the GSA contracts, *not to agencies' task orders*. For GSA's LSA contracts, GSA will no longer fulfill any

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<sup>1</sup> [gsa.gov/eistransition](https://gsa.gov/eistransition)



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requests for new services, including changes and relocation of existing services. All new services required by your agency should be ordered from the EIS contracts or other viable contracts.

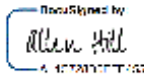
**Managing Risk – Alternatives to Consider Now**

The transition milestone for 100% of all services disconnected from expiring contracts is September 30, 2022. The Networx, WITS 3, and LSA contracts' period of performance ends on May 31, 2023. Agencies in jeopardy of missing these dates should begin investigating options to continue those services until they can be transitioned. Failure to take action well in advance of the May 2023 expiration could result in disruption of services or adjudication action to enable the agency to pay for services received without a valid contract.

Attached to this letter is a table (Attachment A) that lists acquisition strategy options an agency can pursue for continuity of services that are currently on the expiring GSA contracts in the event that the current services are not transitioned prior to contract expiration. GSA recommends that your agency's Lead Transition Manager consult with your Transition Ordering Contracting Officer to determine the best approach for continuity of the remaining services.

If you have any questions or concerns, please contact me at [allen.hill@gsa.gov](mailto:allen.hill@gsa.gov) or (202) 701-7891. If you are not able to reach me, you are also welcome to contact our Acting Executive Director for Enterprise Technology Solutions, Ms. Amy Haseltine, at [amy.haseltine@gsa.gov](mailto:amy.haseltine@gsa.gov) or (202) 403-7052.

Sincerely,

 Digitally signed by Allen Hill

Allen Hill  
Deputy Assistant Commissioner for Category Management  
Information Technology Category  
Federal Acquisition Service

cc: Lead Transition Manager and Transition Ordering Contracting Officer

Attachment A: Acquisition Strategy Options



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Information Technology Category  
Federal Acquisition Service

Attachment A: Acquisition Strategy Options

**Risk:** An agency has selected its EIS vendor(s) but it is clear that some of the services transitioning to EIS may not be moved before the Networkx, Washington Interagency Telecommunications System (WITS) 3, and Local Service Agreement (LSA) contract(s) expire on May 31, 2023.

**Mitigation:** Below are options that an agency could consider to avoid a disruption to these services or having to adjudicate payment for these services if they continue to be provided without a valid contract. **Note:** *Multiple contract actions may be required* where an agency is served by multiple providers. *Agencies should start soon to complete on time.*

Option	Description	Benefits	Challenges
Exception to Fair Opportunity or Limited Source Justification (LSJ)	Award short term task order(s) on EIS or Multiple Award Schedule contract held by the incumbent service provider that can continue services until they are transitioned to EIS	<ul style="list-style-type: none"> <li>Because award is to incumbent, physical transition may not be needed</li> <li>Some services (Virtual Private Network, Ethernet) may cost less</li> <li>If task order under EIS, includes Conexus</li> <li>If EIS and uses Minimum Revenue Guarantee justification, protest risk reduced</li> </ul>	<ul style="list-style-type: none"> <li>Requires Exception to Fair Opportunity justification(s) in accordance with Federal Acquisition Regulation (FAR) 16.505 or a LSJ in accordance with FAR 8.405-8; both are required to be posted over Simplified Acquisition Threshold; can be protested</li> <li>Time and resources needed to execute</li> <li>Prices (e.g. Time-division multiplexing voice) may be higher</li> <li>All services must be under contract</li> <li>Terms and Conditions (T&amp;Cs) and support changes</li> <li>Agency responsible for FAR compliance</li> </ul>
Sole-Source (Part 15 procurement)	Agency awards a sole source contract(s) to vendor(s) of their choice	<ul style="list-style-type: none"> <li>Agency sets T&amp;Cs</li> </ul>	<ul style="list-style-type: none"> <li>Justification for Other than Full and Open Competition (JOFOC)(s) required – difficult to justify with multiple current providers</li> <li>Time and resources needed for new acquisition(s)</li> <li>Likely to cost more</li> <li>Must start soon to complete on time</li> <li>May require a second transition to EIS</li> <li>Agency responsible for FAR compliance</li> <li>No access to GSA information/resources as under Networkx/WITS/EIS</li> </ul>
Competitive Open Market Like-for-Like	Agency conducts a full and open competition to	<ul style="list-style-type: none"> <li>Agency sets T&amp;Cs</li> <li>No justification needed</li> </ul>	<ul style="list-style-type: none"> <li>Potential for no bid</li> <li>Possible pre-award protest</li> <li>Time &amp; Resources needed for new acquisition(s)</li> </ul>

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	continue services like-for-like		<ul style="list-style-type: none"> <li>• Likely to cost more</li> <li>• Must start soon to complete on time</li> <li>• May require a second physical transition to EIS</li> <li>• Agency responsible for FAR compliance</li> <li>• No access to GSA information/resources as under Network/WITS/EIS</li> </ul>
EIS Broker	Originally-selected EIS vendor sub-contracts with incumbent(s) to bring the delayed services under its EIS contract	<ul style="list-style-type: none"> <li>• No separate task order acquisition required</li> <li>• An exception to fair opportunity justification may be required to modify the EIS task order</li> <li>• Includes Conexus</li> </ul>	<ul style="list-style-type: none"> <li>• EIS vendor unlikely to agree due to added sub-contracting workload and cost recovery challenges</li> <li>• All services/Contract Line Item Numbers (CLINs) must be under EIS vendor's contract</li> <li>• Time required to negotiate sub-contracts</li> <li>• Some incumbents may be unwilling to sub-contract at a price deemed fair and reasonable under EIS</li> <li>• Very likely to cost more</li> <li>• Agency responsible for FAR compliance</li> </ul>

## Appendix F. Memorandum - Plan for Limiting Users on Extended Contracts April 2021

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April 27, 2021

MEMORANDUM FOR: Sonny Hashmi  
Commissioner, Federal Acquisition Service

FROM: Laura Stanton <sup>Used Signed by:</sup>  
Assistant Commissioner, Information Technology Category  
Federal Acquisition Service, GSA

SUBJECT: Revised Plan for Limiting Users on Extended Contracts 2021

The Office of Information Technology Category (ITC) is formally notifying the Federal Acquisition Service (FAS) Commissioner of the revised plan to limit users on the extended Network, Washington Interagency Telecommunications System (WITS) 3, and Local Services contracts in advance of communication to customer agencies and affected contractors.

In accordance with guidance from GSA's Senior Procurement Executive as a condition of extending the expiring Network, WITS 3, and Local Services contracts, GSA has required that agencies meet certain critical milestones to be eligible to use the extensions. This memorandum is a follow on to the Office of Information Technology Category's (ITC) July 15, 2019 memo to the Commissioner re: [Plan for Limiting Users on Extended Contracts](#) and presents the intended path forward for enforcing the condition for the remaining time left on the expiring contracts. The original plan outlined seven phases and a timeline for limiting users and contract modifications. Given recent agency progress, and the need for enhanced attention and acceleration, it is appropriate to revise the plan.

#### BACKGROUND

GSA requested agencies sign written agreements in which the agencies committed to award their task orders by September 30, 2019. These agreements informed the agencies that administrative fees on the expiring contracts may increase, and processing contract modifications and new service orders on the expiring contracts may be curtailed during the extended time period. Some of the agencies that will be impacted by the effort to limit users did not sign those agreements.

To enforce this condition, ITC included the following language in the extended contracts:

*Beginning at a time to be determined after March 31, 2020, GSA will begin ordering a gradual disconnection of services for agencies that have not made adequate progress in the transition to EIS. This will be accomplished through a series of targeted warning notices to agencies and subsequent disconnect orders from GSA to Network, WITS 3, and local service contractors. The contractor shall have all disconnect orders completed*

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*by the dates identified in the disconnect orders and cease billing effective as of those dates.*

*GSA intends to conduct the disconnects in phases. GSA plans to obtain written agreements in place with the agencies stating they will award their task orders by September 30, 2019. GSA will determine the phasing based on the agency's completion of awarded task orders on EIS, other indications of activity, and progress in transition, along with considering other special circumstances. Most agencies' disconnects shall be completed no later than September 30, 2022. GSA may approve, under extreme circumstances, a few specific agencies to extend the use of the contract through an "Emergency Action Period" with disconnects to be completed by May 31, 2023.*

*During the contract extension process, GSA will present the contractor with a list of agencies that may be limited in their use of the extended contract according to the process described above. GSA will indicate whether the agency has awarded its EIS task orders and how many active services remain on the contract.*

Subsequent to the July 15, 2019 memo, on March 11, 2020 the Assistant Commissioner for ITC sent a letter to all Agency Transition Sponsors informing them of this condition and the approach to enforcing it. Following that, ITC published a detailed plan ([EIS Transition CLOSEOUT PROJECT PLAN v1](#)) for implementing the approach in the memo. GSA shared this Project Plan for Closeout of Transition to EIS, dated March 23, 2020 with our agency customers, industry partners, and the public. We will revise this plan and share it similarly.

#### CURRENT SITUATION

In spite of extensive, advanced communications and ongoing outreach, several agencies lag behind government-wide milestones re: EIS transition. For example, on January 27, 2021 the Deputy Assistant Commissioner for Category Management sent a letter ([Letter to Agency Transition Sponsors January 2021](#)) to all agencies informing them that "Effective October 1, 2021 . . . GSA will no longer process any contract modifications for new services on the Network and WITS 3 contracts." In addition, many large and medium-sized agencies are still struggling to complete the solicitation phase of transition to EIS and could be subject to significant mission impacts if GSA continues to implement the limitation of users as originally planned. Therefore, the ITC/ETS team is recommending key updates to the Transition Closeout plan in an effort to enhance agency accountability and accelerate progress toward key transition milestones. All changes are intended to reinforce the criticality of methodically executing an EIS transition plan, while simultaneously acknowledging the foundation of EIS-related services to an agency's mission. The attached Summary of Revisions to the Transition Closeout Plan 2021 outlines the changes necessary to reflect these developments. If you have any questions, please contact Amy L. Haseltine, Acting Executive Director of the Office of Enterprise Technology Solutions at [amy.haseltine@gsa.gov](mailto:amy.haseltine@gsa.gov) or 202-403-7052.

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**ATTACHMENT 1: Summary of Revisions to the Transition Closeout Plan 2021**

**1. Changes to Phases for Limiting Users**

Phase	Option Description	Number of Agencies	Agency Category *	Impact of Change on Agencies	Target Disconnect Dates
<b>1-3</b>	Completed: 43 agencies				
<b>4</b>	<p><b>Current Definition:</b> Agencies with solicitations released but not awarded, and not under protest / Price-Only (Added by Core Team) Note: This doesn't include agencies that have not released a solicitation</p>	65: Total	8: Large Agencies 12: Medium Agencies 30: **SANAT with Solicitations 15: ***Price-Only		May 2021
<b>4A</b>	<p><b>Proposed Change:</b> Disconnect-Only--not moving to EIS AND Price-Only--not Awarded Note: 22 Price-Only agencies have made award that is not included in the count</p>	<p><u>32: Total</u> Note: See Tab 'Proposed Phase 4A' for list of agencies. List of agencies as of 04/08/2021. List subject to change based on agencies transitioning.</p>	17: SANAT ***Disconnect Only 15: SANAT Price Only not awarded	OVERALL BENEFIT. SANATs not moving to EIS: will actually help them get their disconnects done because they will not have to write the disconnect orders. Price-Only SANATs: will motivate them to use the price report GSA did for them and proceed with awarding the task order	June 2021 - Agencies identified ASAP and accelerated the process.
<b>4B</b>	<p><b>Proposed Change:</b> Agency with No Solicitations Awarded</p>	<p><u>52: Total</u> Note: See Tab 'Proposed Phase 4B' for list of agencies. List of agencies as of 04/08/2021. List subject to change based on agencies transitioning.</p>	3: Large Agencies 9: Medium Agencies 40: SANAT	MORE FOCUSED. Targets agencies that have not completed ANY acquisition activities (task order awards) and gives more time to those that have demonstrated progress by making some task order awards	August 2021 - Agencies identified April 2, 2021

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5	<b>Current Definition:</b> Agencies with solicitations released but not awarded because of protest or pending contract modification.	Too early to determine agencies with protest and contract mods, excludes agencies with no solicitations released			September 2021
5	<b>Proposed Change:</b> Agency Has not Awarded All Planned Solicitations	<a href="#">78: Total</a> Note: See Tab 'Proposed Phase 5' for list of agencies. List of agencies as of 04/08/2021. List subject to change based on agencies transitioning.	8 Large Agencies 13: Medium Agencies 57: SANAT	CLEAR AND COMPREHENSIVE. Eliminates need to distinguish why agency hasn't awarded task orders and targets all agencies remaining stuck in the acquisition phase	September 2021 - Agencies identified June 1, 2021
6	<b>Current Definition:</b> Agencies with solicitations awarded but experiencing contractor-delayed installation and disconnects.	No changes at this time			March – August 2022
7	<b>Current Definition:</b> Agencies with task orders awarded but services not expected to cutover by September 2022. This is the Emergency Action Period (EAP)	No changes at this time			September 2022 – May 2023

\* Note the list of agencies is subject to change as they make progress over time.

\*\* SANAT = Small Agencies and Native American Tribes

\*\*\* Price-Only - Agencies with total projected expenditures less than the Simplified Acquisition Threshold (SAT) who are conducting a Price Only analysis and have not made a task order award

\*\*\*\* Disconnect-Only - Agencies not moving to EIS who must disconnect all services from the expiring contracts

2. Changes to Freezing Contract Modifications and New Orders



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**Current Description in the Plan:** "To stem the growth of the inventory that needs to be transitioned to EIS, GSA is implementing a freeze effective October 1, 2020 on contract modifications on Networx and WITS and new orders on Regional local service contracts." *The agency may request an exception.*

**Revision:** "Effective October 1, 2021, GSA will no longer accept or process any exception requests for its expiring contracts. Specifically, GSA will no longer process any contract modifications for new services on the Networx and WITS 3 contracts." The plan will continue to allow for exceptions up to the October 2021 date.

- The revised language eliminates the opportunity for agencies to request an exception. This change would represent a clarification of our earlier guidance and reinforce the need for agencies to accelerate and/or maintain progress.

## Appendix G. Letter to Agency Transition Sponsors from AC ITC, 2021

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May 11, 2021

Dear Agency Transition Sponsor:

The Enterprise Infrastructure Solutions (EIS), the U.S General Services Administration's (GSA's) 15-year, \$50 billion contract vehicle, was designed to help meet agency mission needs by providing customer agencies with secure, resilient, cost-effective, innovative, and high-quality telecommunications solutions. The Federal Government is currently in the middle of the transition from the expiring Networkx, Washington Interagency Telecommunications System (WITS) 3, and Regional local service contracts to the EIS contracts. This letter provides EIS Agency Transition Sponsors with an update on GSA's actions to help ensure a timely and effective transition.

The expiring Networkx, WITS 3, and Regional local service contracts were originally extended to 2020. Delays in transition to the EIS contracts and requests from agencies in October 2018, GSA decided to extend the expiring contracts to May 2023 to allow time for agencies to complete transition and modernize. GSA's decision to extend the expiring contracts to May 2023 and utilization of such contracts under the extended expiration dates was, and is, predicated upon agencies making progress toward the transition to EIS (or an alternative acquisition framework).

On March 23, 2020, GSA published the *PROJECT PLAN FOR CLOSEOUT OF TRANSITION TO EIS, VERSION 1.0*, detailing GSA's approach to enforcing the conditions for using the extended contracts. The original plan outlined seven phases, key progress indicators, and a timeline for limiting users and contract modifications. As of this date, Phases 1 through 3 of the "Closeout Project" have been completed. Recent agency progress requires enhanced attention and accelerated efforts, therefore GSA has updated our Project Plan and it is attached and summarized below.

### Limiting Use of Extended Contracts

As noted above, GSA's Networkx, WITS 3 and Regional local service contracts expire on May 31, 2023, and with that expiration date in mind, GSA set a milestone for agencies to complete 100% of their transition activities by September 30, 2022. Effective March 31, 2020, GSA began to limit the use of its extended contracts for agencies that are not making progress towards transition. A key factor denoting progress is agencies completing EIS task order awards; GSA's deadline for agencies to award EIS task orders was September 30, 2019. Given that many agencies have not yet completed their task order awards, this remains a major factor in whether the agency may continue to use the extended contracts.

GSA is using a phased approach to limit agency users based on their reported progress by removing the agency from the Networks Authorized User List (NAUL) of the extended contracts



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and directing the contractors to disconnect the agency's services. GSA will now identify agencies for Phases 4 and 5 based on the indicators of progress below.

- Phase 4A: Agencies disconnecting services and not transitioning them to EIS *and* agencies for whom GSA has provided a report for a price-only fair opportunity decision, but the agency has yet to award the task order. Services will be disconnected by June 30, 2021.
- Phase 4B: Agencies that have not awarded *any* EIS task orders for their solicitations. Services will be disconnected by August 31, 2021.
- Phase 5: Agencies that have not awarded EIS task orders for *all* their solicitations. Services will be disconnected by September 30, 2021.

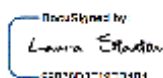
#### Freezing Modifications on Extended Contracts

Effective October 1, 2020, GSA implemented a freeze on growth of services on its extended Network, WITS 3, and Regional local service contracts and tariffs. Specifically, on the Network and WITS 3 contracts, GSA ceased processing contract modifications for new requirements. For GSA's Regional local service contracts and tariffs, GSA no longer fulfills any requests for additional services. All new services required should be acquired under the EIS contracts.

GSA understands that an agency may have a mission critical operational need that requires GSA to modify the extended contracts, and GSA has been allowing exceptions in such cases. However, the deadline for 100% disconnect from the expiring contracts is now only 16 months away. Effective October 1, 2021, GSA will no longer accept or process any exception requests for contract modifications on the Network and WITS 3 contracts or new service orders on the Regional local service contracts and tariffs. On January 27, 2021 the Deputy Assistant Commissioner of Information Technology Category sent an email to all agencies informing them of this new restriction.

GSA will continue to monitor individual agency and government-wide agency progress toward EIS transition, and adjust programmatic and customer support strategies as needed. For all agency customers, GSA's technical assistance tools can be found at Enterprise Infrastructure Solutions website. If you have any questions or concerns, please contact Amy Haseltine, Acting Executive Director, Office of Enterprise Technology Solutions at [amy.haseltine@gsa.gov](mailto:amy.haseltine@gsa.gov).

Sincerely,



Laura J. Stanton

Assistant Commissioner  
Information Technology Category, Federal Acquisition Service

cc: Lead Transition Manager and Transition Ordering Contracting Officer

Attachment: Project Plan for the Closeout of Transition to EIS