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January 20, 2016

Via email to ofcio@omb.eop.gov

Anne E. Rung, United States Chief Acquisition Officer
Tony Scott, United States Chief Information Officer
Office of Management & Budget
1650 Pennsylvania Avenue NW
Eisenhower Executive Office Building
Washington DC 20503

Subject: Category Management Policy 16-1: Improving the Acquisition and Management of Common Information Technology: Software Licensing

Dear Ms. Rung and Mr. Scott:

I am writing today on behalf of Cisco Systems (Cisco) in response to the request for comment issued on December 23, 2015 from the Office of the Federal Chief Acquisition Officer and the Office of the Federal Chief Information Officer, which concerned a draft directive to Federal agencies seeking to drive greater efficiency into how the US government manages and buys software. Cisco agrees with you about the importance of this effort. With that in mind, we have provided specific line edits for the draft directive via GitHub.¹ We also offer the following suggestions that may help guide your efforts.

Cisco is the worldwide leader in information technology. We help customers seize the opportunities of tomorrow by proving that amazing things can happen when you connect the previously unconnected. We have more than 30 years of experience in designing, developing, using, managing, securing, selling, and supporting a wide range of IT, including hardware, software, and services. During that span, the U.S. government has been both an important partner and customer.

With this perspective in mind, we believe that the U.S. government needs to develop a whole lifecycle approach to manage its procurement, deployment, use, and maintenance of software and services, which should include at least the following elements:

¹ <https://github.com/WhiteHouse/software-policy/issues/10>



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1. A comprehensive strategy to ensure that software and services licensing decisions match demonstrated needs;
2. Procedures to confirm that what is paid for is fully deployed and maintains mission relevance;
3. Tools and metrics to measure actual usage and relevance of software and services, which should inform future decisions and aid negotiations
4. Processes to effectively manage risks associated with the use of software and services during the anticipated period of support; and
5. Ongoing analysis and review to ensure lifecycle management efforts remain impactful and incorporate improvements based on experience.

We believe that the process of developing, implementing, maintaining, and improving such a holistic approach for managing the government's software and services resources will aid the government as it operates its own enterprise, manages risk, and delivers services to its citizens.

We look forward to working with you and your offices on this important effort.

Best wishes,

Eric Wenger, Director Global Government Affairs
Cisco Systems