



American Rental Association

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Submitted via <http://www.regulations.gov>

**Comments of the American Rental Association**  
**Re: FAR Case 2019-001**  
**Federal Acquisition Regulation: Analysis for Equipment Acquisitions**

The American Rental Association (ARA) is the trade association representing the Equipment and Event Rental Industry in the United States. We appreciate the opportunity to provide comments on the Notice of Proposed Rulemaking FAR Case 2019-001. ARA supports the proposed rule (85 Fed. Reg. 52081) amending the Federal Acquisition Regulation (FAR) to implement section 555 of the Federal Aviation Administration Reauthorization Act of 2018. Among other changes, Section 555 requires Federal agencies, when acquiring equipment, to undertake a case-by-case analysis of cost and other factors associated with certain methods of acquisition, including both short- and long-term rental.

By more comprehensively identifying relevant acquisition considerations, the proposed rule will better support agencies' efforts to acquire equipment using the acquisition method most advantageous to the Federal government. This rulemaking is a significant improvement over the previous proposed rule in FAR Case 2017-017 and, from ARA's perspective, accurately captures one key aim of Sec. 555, which was to ensure agencies do not overlook the considerable benefits of renting when making acquisition decisions under subpart 7.4 of the FAR. Accordingly, we urge you to issue the final rule and implement the improvements made by this rule as soon as possible.

We look forward to working with Federal agencies in implementing this rule to ensure fair consideration of rental under subpart 7.4's improved equipment acquisition analysis.

Sincerely,

A handwritten signature in black ink that reads "John W. McClelland". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

John W. McClelland Ph.D.  
Vice-President of Government Affairs  
And Chief Economist  
American Rental Association

