



ACQUISITION,  
TECHNOLOGY  
AND LOGISTICS

OFFICE OF THE UNDER SECRETARY OF DEFENSE

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MEMORANDUM FOR COMMANDER, UNITED STATES SPECIAL OPERATIONS  
COMMAND (ATTN: ACQUISITION EXECUTIVE)  
COMMANDER, UNITED STATES TRANSPORTATION  
COMMAND (ATTN: ACQUISITION EXECUTIVE)  
DEPUTY ASSISTANT SECRETARY OF THE ARMY  
(PROCUREMENT)  
DEPUTY ASSISTANT SECRETARY OF THE NAVY  
(ACQUISITION & LOGISTICS MANAGEMENT)  
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE  
(CONTRACTING)  
DIRECTORS, DEFENSE AGENCIES  
DIRECTORS, DOD FIELD ACTIVITIES


SUBJECT: Reporting Governmentwide Purchase Card Actions to the Federal Procurement Data System

This memo is to clearly indicate the requirements regarding reporting of actions conducted with the Governmentwide Purchase Card (GPC) to the Federal Procurement Data System (FPDS). The following requirements are effective immediately and will be incorporated into the Procedures, Guidance, and Information (PGI) part 204.6 by December 31, 2010.

- (1) Any contract or order where the GPC is used solely as the method of payment shall be reported to FPDS individually regardless of dollar value.
- (2) Open-market actions (i.e., order not under a federal contract or agreement) purchased and paid for using the GPC shall not be reported to FPDS, except in accordance with Federal Acquisition Regulation (FAR) part 4.606(a)(2). As a reminder, the GPC may only be used for open market actions when the value of the action is under or equal to the micro-purchase threshold as defined in FAR part 2.101.
- (3) For order actions under federally-awarded contracts (e.g., schedules, governmentwide acquisition contracts, indefinite delivery contracts), blanket purchase agreements, and basic ordering agreements:
  - (a) Components shall report all actions purchased and paid for using the GPC to FPDS.
  - (b) Actions valued \$25,000 or more must be reported individually; express reporting processes (see PGI part 204.6) shall not be used.
  - (c) Components shall report the actions valued less than \$25,000 in the following descending order of preference:
    - i. Individually, not using express reporting procedures.

- ii. Using express reporting procedures that compile all actions monthly under the identified existing contract/agreement (such as a specific schedule) and vendor.
- iii. Using express reporting procedures that compile all actions monthly without specifically identifying the existing contract/agreement and vendor. Only use this alternative when the first two choices are determined to be overly burdensome by the Head of the Contracting Agency, as it limits the ability to be compliant with the Transparency Act. When used, identify the vendor using the generic DUNS number for either domestic or foreign GPC consolidated reporting (see PGI part 204.6). This is the only situations when these generic DUNS numbers shall be used.

Thank you for your continuing efforts in improving data quality and compliance with the Transparency Act. Any questions may be directed to Lisa Romney, [lisa.romney@osd.mil](mailto:lisa.romney@osd.mil), 703-602-8007, my action officer for FPDS.



Shay D. Assad  
Director, Defense Procurement  
and Acquisition Policy