

DOD Publishes DFAR Amendment for RFID

The U.S. Defense Department has issued a proposed Defense Federal Acquisition Regulation Supplement amendment that specifies RFID requirements for suppliers.

By Jonathan Collins

Apr. 22, 2005—The U.S. Department of Defense has published its passive RFID tagging requirements for its suppliers, six months later than it had originally planned to issue a ruling.

The proposed Defense Federal Acquisition Regulation Supplement (DFARS) amendment was posted on Thursday on the Web sites of the [Federal Register](#) and the Defense Acquisition Regulations System Directorate's Web site (see [DFARS Case 2004-D011](#)). The proposed rules will help create a standard DOD suppliers' contract clause for the DOD's passive RFID tagging requirements. Suppliers and other interested parties have until June 20 to comment on the proposed DFARS amendment. Questions and comments may be submitted online at emissary.acq.osd.mil/dar/dfars.nsf/pubcomm. All questions and comments received will be posted to emissary.acq.osd.mil/dar/dfars.nsf. The DOD has 30 days to respond to the questions and comments. The Office of Management and Budget (OMB) will then evaluate the questions, comments and DOD responses, and eventually publish the final rules.

Although the DOD plans to require all its suppliers to use passive RFID tags by 2007, this DFARS amendment covers only a limited segment of materiel and only shipments sent to two of the DOD's distributions centers. The proposed changes require contractors to affix passive RFID tags at the case and "palletized unit load" levels when shipping packaged operational rations, clothing, individual equipment, tools, personal demand items, or weapon system repair parts, to the Defense Distribution Depot in Susquehanna, Pa., or the Defense Distribution Depot in San Joaquin, Calif. Already equipped with RFID readers and supporting infrastructure, both depots have been accepting pallets and cases with passive UHF RFID tags based on Electronic Product Code (EPC) specifications since January this year (see [DOD Accepts First RFID-Tagged Shipments](#)).

So far, those shipments have been tagged on a voluntary basis, but the DFARS amendment aims to make tagging a part of all suppliers' contracts.

"We don't need a DFAR clause to have a clause in a contract of supply. A contracting officer can write that in. However, in order to do this on a massive scale—and the DOD has thousands and thousands of contracting officers—we have to have it standard, we are going to have the DFAR rule," said Alan Estevez, assistant deputy undersecretary of defense for supply chain integration at the RFID Journal LIVE! event held in Chicago last week.

The DOD says it is particularly interested in receiving comments on a number of issues related to passive shipment tagging by its suppliers. These comprise the proposed definitions of "case" and "palletized unit load," the impact of the requirement for suppliers to provide electronic advance shipment notification (ASN) information, whether small-business considerations have been fully addressed and the impact and potential mitigation regarding the attachment of RFID tags to shipments. The proposed amendment currently defines a

case as "either an exterior container within a palletized unit load or an individual shipping container," and defines a palletized unit load as "a MIL-STD-129 defined quantity of items, packed or unpacked, arranged on a pallet in a specified manner and secured, strapped, or fastened on the pallet so that the whole palletized load is handled as a single unit."

The DOD had initially hoped to publish its DFARS proposal in late 2004 so that the contract clause could be in place for the January 2005 RFID start date for receiving RFID tagged pallets and cases (see Military Marches Toward Adoption). At RFID Journal LIVE! Estevez told attendees that although the federal government's rule-making process had been a little frustrating and had drawn out the publication of the amendment, he correctly estimated that publication would take place within two weeks.

Much of the detail in the proposed amendment was set out in August last year, when the DOD published its final policy guidelines for the use of both passive and active RFID tags within its supply chain (see DOD Releases Final RFID Policy).

Under the DOD schedule for implementing passive RFID tagging, by Jan. 1, 2006, the DOD will require passive RFID tags to be placed on cases and tags of subsistence and comfort items, packaged petroleum, lubricants, oils, preservatives and chemicals, construction and barrier material, ammunition of all types, pharmaceutical and medical material shipped to 32 depots throughout the United States and the two DLA distribution centers. DOD suppliers can use any tag supplier as long as it is a 64-bit or 96-bit EPC Class 0 or Class 1 tag. Beginning Jan. 1, 2007, all cases and pallets of all commodities shipped to all DOD locations should be tagged.

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