Consolidated Q&A

1. How flexible is the requirement for an ISO7816 Operating System? Is a Java based system with the correct LDS acceptable?

The Government requires the highest level of global interoperability possible.

2. Is there a requirement for printing, fiducials and/or other markings on the inlays? For example: unique serial numbering; date; chip ID; vendor ID; etc.

No

3. Tests have shown that a antenna, bigger than ID1 size shows better performance in terms of anti collision, more reliable data transmission and better energy supply for the chip. Is their flexibility regarding the antenna size related to system performance and optimization?

To assure global interoperability, DoS requires ID1-sized antennas.

4. Is is necessary to "write protect" the passport after personalization?

After personalization the EP chip will be permanently locked and thereafter will support read-only functionality.

5. What consideration, if any, should be given to the ePassport's compatibility with eVisas? This topic is currently under discussion by ICAO. If compatibility to x number of eVisas is required, the frequency tuning of the ePassport's antenna may need to be modified to ensure expected performance.

No consideration should be given.

6. Given that the preferred delivered product is a passport inlay, bonded to the cover as

"one product" (i.e. EP Book Cover Sheets); are there any restrictions related to the types of adhesives that can be used to achieve the destructive bond between the inlay and cover?

There are no explicit requirements for the adhesive used in assembling the EP Book Cover Sheet.

7. What security certification of the OS is required in detail?

At least EAL4 against a Smart Card Protection Profile.

8. The industry standard for ESD protection is between 6-7 kV. Page 102 states a parameter of 10kV. Please explain.

The EP shall continue to function normally after testing in accordance with the test methods described in ISO/IEC 10373 (IEC 1000-4-2:1995), where the test voltage is 6kV.

9. The tender specifies => 64k memory. This makes sense for the moment and seems

sufficient, but chip memories are doubling about every two years. Consideration should be give to stating that the system must be upgradeable to take advantage of regular, technically driven, increases of the memory over the coming years. It is suggested that the system design remain open with a view to these memory and chip improvements.

The Government expects to be offered technology upgrades as they become available and cost-effective.

10. Special anti skimming mechanisms (electromagnetic shielding) are available for integration into the inlays. These technologies ensure that the data communication is completely disabled when the ePassport is closed. Is this a relevant option for the US ePassport?

Yes, as long as GPO will be able to read the inlay in the book making processs while the book is closed.

11. Does passive authentication mean that an unlock-code is sent to the card before the

facial image can be read? How is the unlock code generated, stored, and protected?

The data on the EP IC will not be locked. The Digital Signature will be the authentication mechanism.

12. Does active authentication mean that the reader authenticates the card and the card

does not verify reader? Does each card have a unique pair of public-private key pairs?

Active authentication will not be invoked with the EP as currently planned. It might be in the future – beyond the term of this contract. Details are yet to be determined.

13. What are the Specifications on the readers (e.g. connection type, operating systems supported, power, mounting, etc.)?

The specifications are as stated in Appendix D *Characteristics for Reader/Writers* in the Final RFP

14. In Section 7.4, there is no transaction timing requirements as referenced in IC test on page 72. Please provide the transaction timing requirements.

It should read "The total time from placing the book on the reader to when the transaction is completed shall be less than 11 seconds for reading or writing 32 KB of data (Appendix D – Characteristics for Reader/Writers)

15. Which CLIN item do we include the pricing for key personnel (Project Manager, Senior Scientist, Software System Engineer, etc.)?

As specified in Section L: The Project Manager cost shall be shared across fixed priced CLINs but not as a separate item.

Technical Support CLINS (CLINS 0004, 1004, 2004, 3004, 4004) include the price of the other personnel.

16. How many "past performance" references are required in this proposal?

A maximum of 5 past performance citations

17. How many readers/writers does the vendor need to supply?

As stated in Section B – *Supplies or Services and Prices/Costs*, from one to 50 for CLIN 0003.

18. It is written that apart from textual data, the only data to be stored on the electronic passport will be the full digital facial image. ICAO's "Biometric Deployment of MRTD – Technical report – Version 2.0 (draft 2) on page 35; recommends that the image size be of 15-20KB of memory. Since the textual data will unlikely exceed 5KB of memory, could not the requirement accept submission of 32KB platforms until the end of Phase II of the Electronic Passport project? This would allow for multiple sources of silicon which would lessen supply risk for the project.

Except as noted in the RFP, the offered IC shall have a minimum of 64 KiloBytes (KB) of electrically erasable programmable read-only memory (EEPROM) space available for Government discretionary use.

19. The document "PKI for Machine Readable Travel Documents Offering ICC Read-Only

Access" reached version 1.0 on April 1, 2004. Shall this version be used instead of v0.4?

"PKI Digital Signatures for MRTDs v4.0" is the version available at <u>www.icao.int/mrtd/</u> website. "PKI for Machine Readable Travel Documents Offering ICC Read-Only Access" is not one of the documents listed in C7.2.2.1 Inlay Standards.

20. The document "Biometrics Deployment" has now reached version 2.0 – draft 2. Shall this version be used instead of v1.9?

As referenced in Section C, Appendix D *Biometric Deployment of Machine Readable Travel Documents, Technical Report Version 2.0 (draft 2)* dated 5 May 04 shall be used.

21. Given the fact that ICAO does not specify the command set to be used for personalization; shall not the formulation of this criteria give more flexibility for the administrative commands that shall be used for IC personalization? Inlay personalization processes are not standardized. DELETE FILE might not be necessary during personalization. VERIFY might not be secure enough for passport personalization. READ RECORD and WRITE RECORD might not be required since only transparent files are required to support LDS specification.

DELETE FILE is desired functionality to complement CREATE FILE. VERIFY, READ RECORD, and WRITE RECORD will not be used to personalize EP as currently planned, but are desired for possible future use.

22. In Section 1.5 it is stated "the chip/antenna array will be inserted in the inside back cover by the GPO". In other sections it is stated that a completed cover will be delivered to the GPO. Could you please clarify?

Section 1.5 of the abstract will be corrected. Book cover sheets consisting of three book covers per sheet (Three up configuration) will be delivered to GPO. Each EP book cover consists of an inlay containing an ISO 14443 Type A or Type B compliant contactless IC/antenna assembly adhered to passport book cover stock.

23.

- a. Do parts 3&4 of the ISO/IEC 14443 standards apply to Type A or B?
- b. Section C7.2.2.1 (Page 65) ISO/IEC 14443 standards for contactless integrated circuit(s) cards sections 2, 3 & 4 are required as appropriate. Section 1 is an integral part of the standard. Will it be added to this sections requirement for it is incorporated into section 1.4?
- c. Section C7.2.2.2 (Pages 66-67): This section requests the offeror to certify that the offered inlay is incompliance with ISO14443 parts 2 4. We suggest for consistency that part 1 is included as part of this requirement.

Types A and B are part of the ISO 14443 standard for Proximity Cards. ISO/IEC 14443-1 addresses Proximity Card Physical Characteristics and so is not entirely appropriate.

ISO/IEC 14443-2 addresses Radio Frequency power and signal interface and so is appropriate.

ISO/IEC 14443-3 - Initialization and Anti-collision and so is appropriate. ISO/IEC 14443-4 - Transmission Protocol and so is appropriate.

24. In Appendix E: Glossary (Page 32): Should EP book cover be Type A <u>or</u> Type B compliant instead of Type A only?

Yes

- 25. <u>Section C.7.2.2.1 (Page 65)</u>: ISO 7810 Physical Characteristics & Test Methods a. The ISO 7810 Standard Physical Characteristics requires
 - 0.76mm +/-10%. We would like to confirm that this is the specification and standard the GPO is referring to?

<u>Section C.7.2.2.1</u> requires that the listed international recommendations and standards shall be met, *as appropriate.* The appropriate 7810 physical characteristics specifications might be bending stiffness, flammability, toxicity, resistance to chemicals, warpage, resistance to heat, and contamination, for example. Bank card nominal thickness specification (0.76mm) is not appropriate. As specified in C7.2.1, the total thickness of the EP Book Cover shall be 0.70mm +/- 10%.

26. <u>Section C7.2.1 (25) (Page 64)</u> EP Book Cover Physical Characteristics: It is stated, " The total thickness of the EP Book Cover shall be

0.70 mm +/- 10%."

- On Page 65 it is stated the Inlay standard shall conform with: ISO 7810 -Physical Characteristics and Test Methods that set the standard as 0.76 mm +/-10%.
- b. Was this a typo where 0.70 mm should be .76 mm +/- 10%?

As is specified in C7.2.1, the total thickness of the EP Book Cover shall be 0.70mm +/- 10%.

- 27. Section J Attachments (Page 91, Paragraph 2, line 14): "It is not the intention of the GPO or DS to monitor and inspect the facilities and employees of chip and antenna suppliers or inlay substrate provides that will provide commercially offered chip and antenna components and inlay substrates to fabricators of the inlays or the fabricators of inlays and cover material."
 - a. We believe that the Inlay assembly house can be a non-secured facility.
 - b. If it is required, at the inlay assembly facility, to unlock the chip at the time the chip mounted on the inlay we suggest this be conducted in a secured facility.
 - c. Normally, the antenna integration process is integral to the inlay. The Inlay production normally comprises of the following steps:
 - i. Raw material: Chip module, Inlay substrate, wire (for the antenna).
 - ii. Wire is implanted (or printed) on the inlay substrate.
 - iii. The chip is implanted on the "wired" inlay.
 - d. The final assembled Inlay is a sheet of plastic that incorporates the chip that is attached to the antenna and embedded in the inlay.

The facility security requirements specified in Attachment 1 of Section J "...apply to prime contractor and any sub-contractors that are involved in the production/fabrication of offered inlays and book covers that include embedded inlays.

- 28. <u>Attachment 4, Page 102</u>: Test Requirements Checklist To Be Submitted By Offeror As Part Of The Technical Proposal:
 - a. Is it correctly stated that the maximum temperature is +125C (military) and not +85C (Industrial)?

The maximum temperature should be +85C. The minimum temperature for temperature cycling should be –25C. The RFP will be changed.

29. Section L.5.2.1

This section indicates that the past performance (Section B.4) survey is part of the Technical Proposal. In attachment 5 it is indicated that these should be sent directly to the GPO. Could you please clarify?

The results should be sent to GPO. GPO will provide the results of the survey to the Technical Evaluators.

30. <u>Section L.5.2.1</u>

This section states that there will be a Compliance Matrix Section J that will be incorporated into the Technical Proposal as Appendix A. The Section J cover page does not reference the Compliance Matrix and the Draft RFP does not contain the outline for the Compliance Matrix. Could you please clarify?

The compliance matrix will be another attachment in section J.

31. Section C.9

Section C.9 contains reference to the basic contract referring to, we assume, the GSA Common Access Smart ID Contract. Should these references be eliminated? Could you please clarify?

The section: "Ensures smooth coordination consistent with this contract and task order procedures for the key personnel approval, consent to subcontract as well as consent to purchase travel, tools and other direct costs. Ensures problem resolution and customer satisfaction for individual task orders." Will be replaced with: "Ensures smooth coordination and problem resolution and customer satisfaction."

32. <u>Section C.7.2.2.3</u> Operating System Support (57)

It states "the operating and interpreter systems shall comply with the standards made available throughout the industry including Government Smart Card – Interoperability Specifications (GSC-IS) version 2.1 (the intent is to avoid specific IC encoders and readers)." This should also include that any reference to a Java based operating system is not required for ICAO requires a file-based structure. Could you please add additional clarification?

The Government requires the highest level of global interoperability possible and requires compliance with ICAO recommendations.

33. Does the Government intend to publish all comments and questions received related to the Draft RFP?

Yes

34. Is the intent that the transport key be used exclusively for shipments from the contractor to GPO and not from the GPO to the sixteen passport issuance locations?

The Government requires a transport key be used for shipments from the contractor to the GPO. The Government also requires the security of a transport key in the shipments of blank EP books from GPO to the sixteen passport issuance agencies.

35. The draft Solicitation requests multiple CLINS (i.e., 0003, 1003, 2003, 3003, and 4003) for annual delivery of 1-50 readers for GPO but has no provision for full page Readers to be used by inspectors in the field. Recommend that these additionally required readers be included in this procurement.

No, they are not part of this procurement.

36. CLIN 0002 is a Mandatory item for 700 EP Book Cover Sheets. After procuring these Mandatory items, the subsequent CLIN 0005 should be for a greater quantity than one. In fact, Schedule F, "Deliverable Schedule", the quantity is listed as 1,000 – 20,000. We also suggest that CLIN 0005 be a Mandatory item. If CLIN 0005 remains optional, the minimum procurement quantity could be as small as 707 inlays (CLIN 0001 + CLIN 0002), which appears to be an unusually small commitment by the Government. We would propose CLIN 0005 as a Mandatory

item for a minimal additional 1,000 EP Book Cover Sheets for a total of 1,707 Mandatory units.

CLIN 0005 will be changed to 1000- 6000

CLIN 0005 is OPTIONAL {the vendor's earlier deliverable product might prove unsatisfactory and so there might be no further purchase}

37. In Schedule B, there are ranges of quantities specified for IC Reader/Writers and Book Cover sheets. There is also a range of hours specified for the Technical Support. Since there is a requirement to propose an "Extended Price" for these items, is it correct to assume that the highest total in the range should be used to calculate the "Extended Price"? If not, what quantity(s) should be used as the basis for calculating the "Extended Price"?

Use 25 Reader/Writers as the number to base the price on. Use 400 hrs as the base number of hours to calculate costing.

38. Time and Material CLINS do not provide for a breakdown of various labor categories and proposed rates. It is recommended that these CLINS be restructured to allow for the identification of each category and applicable billing rate as well as extended value. If the format is not changed, will the Offeror be permitted to add the breakdown of each labor category, billing rate, hours and extended value to each applicable Time and Material CLIN?

The T&M CLINS remain as stated. The Offeror is not permitted to add the breakdown of each labor category, billing rate, hours and extended value to each applicable Time and Material CLIN.

39. "Normal Use" is not well defined. We recommend that an effort be made to either establish the limits of normal use or define conditions that constitute abuse or misuse by the customer that would be considered outside the bounds of normal use. Such clarification might serve to reduce the need for discussions between Offerors and the Government concerning warranty issues. We also recommend applying the "normal use" restriction to the three year warranty section and the extended warranty options section.

Clarification will be made.

40. EP Book Cover Sheets are delivered in sets of three (3-up inlay). If single IC/antenna inlay book covers are returned by GPO to the Offeror, the quantity returned will be accounted for and the Offeror will return to GPO a corresponding quantity of replacement 3-up inlays.

When a group of single inlay book covers are returned by GPO to the Offeror, the Offeror will account for the quantity returned and replace with a corresponding quantity of three-up inlays.

41. The specification of thickness at 0.70 mm will eliminate some possible IC chip offerings and may unduly restrict competition. Also, a thicker inlay may serve to provide additional protection for the embedded IC chip and antenna. We recommend using a thickness specification of 0.70mm - 0.85 mm +/- 10%. The 0.85mm thick Book Covers have been tested in the Toppan printer and found not to

create problems for the Toppan printer. The added thickness, however, does allow additional and competitive IC chip offerings.

An EP Book Cover thickness of 0.70mm +/- 10% is the Government requirement.

42. ISO 14443 Part 2 specifies interface power at 1.5 to 7.5 Amp/Meter. ICAO is recommending 4.0 to 7.5 Amp/Meter for improved interoperability, higher data rates, and reduced error rates. To insure that readers are able to work with a variety of IC/antenna configurations we propose that the reader solicited by GPO be able to support power levels of 4 Amp/Meter or greater.

The Government requires that the ISO 14443 Part 2 specification be met.

43. The term EEPROM is used with a variety of potential meanings. The term EEPROM can refer to a particular type of silicon implementation of memory cells. Alternately, EEPROM can refer to a functionality particular functionality. In the Glossary (Appendix E), the term EEPROM is defined as "EEPROM (electrically erasable programmable read-only memory) is user-modifiable read-only memory that can be erased and reprogrammed (written to) repeatedly through the application of higher than normal electrical voltage." We recommend that the desired functionality (as opposed to the term EEPROM) be clearly identified and incorporated.

The Government is using the term to refer to a particular type of silicon implementation of memory cells.

44. In each of the cited paragraphs, the reader is used to collect data, create reports, or interact with another system. Does this mean a "standalone" system with a controlling computer or will the readers be connected directly to GPO equipment?

GPO's reader/writers will be connected directly to GPO equipment.

45. Does the customer's inventory control system refer to a system in operation at the GPO? What will be the format for the electronic data file?

The inventory control system refers to a system that will in operation at the GPO.

46. In Section C 7V draft (2).doc, Section C9 Key Personnel, 2nd paragraph: Key personnel shall be assigned for the duration of this contract, but may be replaced or removed subject to Section H.8.4 Contractor Substitution of Personnel and H.8.5 Unsatisfactory Performance by Contractor Personnel of the basic contract Could not find either Section H.8.4 or Section H.8.5. Please clarify.

The referenced section regarding Contractor Substitutions of Personnel and Unsatisfactory Performance by Contractor Personnel was inadvertently left out of the draft. It will be included in the Final RFP.

47. The delivery schedule requested is unusually aggressive. Specifically, submission of 7 kits the day after contact award would require all Offerors (including losing Offerors) to have kits assembled at their own expense prior to contract award.

Submitting 1,000 – 20,000 EP Book Cover sheets within 40 working days after receipt of order could create inventory well in excess of that needed to meet the actual SIA pilot production schedule. Similarly, submission of 1,000 to 2.9 million EP Book Cover sheets within 40 days after receipt of order would be virtually impossible for any supplier and also would create a significant excess inventory problem for the agency. We recommend that the delivery schedule be matched to the monthly production requirements of the agency.

The delivery schedule remains as stated in theDraft RFP.

48. In Section Section – I – Contract Clauses "American Made Product." American Made Products. No Reference is provided; please clarify.

The Buy American Act will be implemented in accordance with MMAR 52.225-1 and 52.225-2, which will be incorporated in Section I.

 Section K – Representations, Certifications and Other Statements of Bidders, 7.
52.219-13 Notice of Total Hubzone Set-Aside (JAN 1999), (b) General. It appears that the HUBZone reference was inadvertently placed in the electronic version of the Draft RFP

Delete this reference.

50. In Section L– Instructions, Conditions, and Notices to Offerors, Paragraph L.5 Submission of Offers, Alternative Proposals and Paragraph L.5.3 Past Performance Surveys Submitted by Offeror's References. If an Offeror submits more than one proposal in accordance with Paragraph L.5. Alternative Proposals, it is assumed that the Past Performance References that are the same in each will only require submission of a single Past Performance Survey.

Yes, should an Offeror submit alternative proposals, Past Performance references duplicated in each need only be asked to provide a single Past Performance Survey, which should be referenced by the Offeror and will be used by the Government in evaluating each alternative proposal.

51. In Section L - Instructions, Conditions, and Notices to Offerors, Paragraph L.5.1 c. Cost/Price Supporting Documentation. "....Along with the summary schedule, the Offeror is required to provide full back-up documentation for each CLIN......" Since this procurement includes competitive pricing, should the requirement for the Offeror to provide full back-up documentation (to include indirect rates base labor rates and fee) be limited to cost reimbursable CLINS?

Yes the text will be changed to "....Along with the summary schedule, the Offeror is required to provide full back-up documentation for each cost reimbursable CLIN......"

52. Software items may need to be tailored for integration with GPO production requirements described in this Solicitation and, therefore, cannot be released as commercial or general release products before the closing date of the solicitation.

Section L , L.4 will be changed to read: "All hardware and software proposed in response to this solicitation, with the exception of software items that must be tailored specifically for integration with the GPO production process, document shall have been formally announced for general release on or before the closing date of the solicitation. Failure to have equipment or software announced prior to submission of proposal may render the Offeror's proposal unacceptable."

53. Dimensions of the 3-up coversheet given on pages 15, 18, and 24 are not consistent. Could you specify the size of the coversheet to be provided?

The dimensions specified in *Appendix C* – *Cover Sizing* (p24 of posted Draft) are the correct dimensions. The dimensions specified elsewhere will be corrected in the final version of the RFP.

54. ICG Holliston is listed as the vendor of the Qualified Product in the case of the blue cover material. No vendor is listed for qualified products of the other color cover materials. Could you provide complete information on vendors with qualified products?

ICG Holliston is the current supplier of all cover matrials and is the only qualified vendor to have delivered useable cover material at this time.

55. What is the minimum USB interface speed to be supported?

USB 2.0 speed is the minimum to be supported.

56. Can a vendor offer more than one product – i.e. a coversheet containing Type A inlays and a coversheet containing Type B inlays - to satisfy CLIN 0002?

Vendors must submit a separate proposal for each different product offered.

57. It is important that vendors know specifically which versions and revisions of the ICAO recommendations are to be followed and referenced. There have been at least 4 versions of the LDS recommendation released in 2004. Could you be as specific as possible?

The final RFP will refer explicitly to the versions of the ICAO references to be followed.

58. ReadRecord and WriteRecord commands:These two commands apply to record files which are not supported by the ICAO LDS 1.6. Confirm that you need to support these two commands and on which type of record file?

Support for these commands is required.

READ RECORD and WRITE RECORD is not planned to be used for the EP (i.e. to write/read LDS), but are desired for possible future functionality. The type of file is to be determined.

59. For each requirement to comply with a Common Criteria certification, an associated Security Target and Protection Profile should be specified. Can this information be included to make these security requirements meaningful and achievable?

The vendor is asked to provide information on which security target(s) and protection profile(s) was used to comply with a Common Criteria certification.

60. EP Book Cover Physical Characteristics, Para (25) states "The total thickness of the EP Book Cover shall be 0.70 mm +/- 10%." and indicates that this max thickness is specified due to limitations of the existing Toppan printers used for passport issuance. Given the heavy emphasis on the need for booklet durability and protection of the high value chip component, could DoS provide more explicit dimensional information on the limits of the booklet for compliance with the Toppan printer?

An EP Book Cover thickness of 0.70mm +/- 10% is the Government requirement.

61. What are the modifications and special settings to be applied on the customized Toppan MP300US printers?

They are being investigated.

62. What is the maximum limit for the thickness of the front cover? What is the maximum thickness allowable for the back cover incorporating the electronic component?

An EP Book Cover thickness of 0.70mm +/- 10% is the Government requirement.

The cover (front and back cover) needs to be of uniform thickness to minimize impact upon GPO book fabrication processes.

63. What is the maximum allowable thickness for the closed passport booklet?

The Toppan printer will be adapted to accommodate EP total thickness as described in the RFP

64. Could a manufacturer use a cover material from a vendor on the QPL that is thinner than currently specified (0.35 mm) in order to better comply to this requirement?

Yes

65. What is the more critical factor: the nominal value of $700\mu m$ or the tolerance value of +/-10%?

An EP Book Cover thickness of 0.70mm +/- 10% is the Government requirement; the values are equally critical.

66. Could GPO/DOS consider a 700µm –10% +30% or 850µm +/-10%?

An EP Book Cover thickness of 0.70mm +/- 10% is the Government requirement.

67. In C7.2.2.3 what is the CLIN corresponding to this "data accessing software"?

Personalization System Test Kit (CLIN 0001)

68. In C7.3.2 what is the CLIN corresponding to the software associated with this requirement?

Reader/Writers for GPO (CLIN 003, 1003, 2003, 3003, 4003)

69. In Section F there are slight differences in quantities and delivery times specified here as compared to those in section B.3, pages 40 to 49? Could you specify which is correct?

In Section F, Base Year; EP Book Cover Sheets (CLIN 0006) should read 1,000 to 3.0 million EP Book Cover Sheets. In Section B, Base Period; EP Book Cover Sheets for SIA Pilot should read 1000-6000 EP Book Cover Sheets (3000 – 18000 EP Book Covers) CLIN 0007 – Adhesive may be evoked twice, a mandatory time with delivery 10 days after contract award in sufficient quantity for the test books plus spoilage. A second optional time with delivery 40 days after receipt of order in sufficient quantity for the SIA pilot plus spoilage.

70. In the Compliance Matrix the draft RFP contains bracketed numbers in blue – from 1 to 128. Do these numbers correspond to requirements that should be match against in the Compliance Matrix?

The numbers will be removed in the final RFP. A compliance matrix to be completed by the offeror will be in Section J – Attachments.

71. In Section LL5.2.1 it is indicated here that Section J would include a Compliance Matrix that offerors would complete as a part of their response. This Compliance Matrix seems to have been omitted. Could it be provided?

The compliance matrix to be completed by the offeror will be in Section J – Attachments in the final RFP.

72. In C7.6.3, could you be more specific about the technical requirements of the adhesive requested – i.e. viscosity limits, pot life?

The viscosity is currently 1100-1300 centipoise. Pot life in the machine is 8 hours, open, with constant replenishment.

73. In C7.6.3 could GPO provide more detail on the environmental regulations cited?

VOC cannot be higher than 16%. Refer to CFR 40 part 60 for more details.

74. The Government is requesting a software application/utility for manifesting. Will the utility be provided to the Government under the labor hours for the project?

The utility to be provided by the contractor should not be provided under labor hours. It has to be provided by the contractor to prove that their chips work and match their manifest.