



OFFICE OF THE ASSISTANT SECRETARY OF WAR

3500 DEFENSE PENTAGON
WASHINGTON, DC 20301-3500

SUSTAINMENT

MEMORANDUM FOR SUPPLY PROCESS REVIEW COMMITTEE

SUBJECT: Approved Defense Logistics Management Standards Change 1515, Multi-Change 9471 Transaction Update

The attached Defense Logistics Management Standards (DLMS) change is approved for immediate implementation.

This Approved Defense Logistics Management Standards Change (ADC) 1515 establishes the ability to convey multiple Government Furnished Property (GFP) Product/Service Identification (ID) changes to an Accountable Property System of Record (APSR) in a single transaction. The item undergoing change must have an active property record established in the APSR. This transaction identifies both the 'original' Product/Service ID (currently tracked in the APSR) and the 'new' Product/Service ID (after the contractor modifies the item during contract performance). The key changes authorized in this ADC include:

- Consolidated Data Updates: Enables a single DLMS 947I transaction to execute multiple concurrent identity changes on a GFP item, eliminating administrative delays.
- Financial Accountability: Secures financial reporting and asset accountability by delivering a complete history of GFP modifications directly to the APSR.
- Mandatory APSR System Upgrades: Requires property systems to be reprogrammed to recognize and correctly process this new consolidated transaction format.

Please direct any questions regarding this implementation to Alexa Ferrari at DEDSO.Supply@dla.mil. Please contact your designated Process Review Committee (PRC) Representative, listed on the Defense Enterprise Data Standards Office (DEDSO) Committee Contacts Webpage.

Erica H. Plath
Deputy Assistant Secretary of War
for Logistics

Attachment:
As Stated

Approved Defense Logistics Management Standards Change 1515 Multi-Change 947I Transaction Update

1. ORIGINATING SERVICE/AGENCY AND POC INFORMATION:

a. **Functional POC:** Carol Brown, Office of the Assistant Secretary of War for Acquisition, Defense Pricing, Contracting, and Acquisition Policy (OASW(A)/DPCAP), carol.a.brown160.civ@mail.mil

b. **Technical POC:** Pam Rooney, OASW(A)/DPCAP, pamela.p.rooney.ctr@mail.mil

2. REASON FOR CHANGE:

a. **Bottom Line Up Front:**

(1) This Defense Logistics Management Standards (DLMS) change establishes the ability to convey multiple Government Furnished Property (GFP) Product/Service Identification (ID) changes to an Accountable Property System of Record (APSR) in one transaction. The item undergoing change must have an active property record established in the APSR. This transaction will identify the 'original' Product/Service ID and the 'new' Product/Service ID of an individual item of GFP. The 'original' Product/Service ID are the data elements currently tracked in the APSR; the 'new' Product/Service ID are the data elements after the item has been changed by the contractor during performance of the contract.

(2) During a modification, upgrade, remanufacturing, etc., of GFP materiel any of the Product/Service ID data elements can be changed due to contractor action when authorized by the contract and the GFP Attachment. Any change must be reported to the designated APSR to ensure accurate financial reporting of assets. This change will only apply to serially managed GFP items. Each inventory adjustment using this process will be against a single item. This process does not authorize the transmission of multiple inventory adjustments in a single transaction.

b. **Background:**

(1) The GFP Product/Service ID is the combination of data elements (a) through (d).

(a) National Stock Number (NSN)

(b) Commercial and Government Entity (CAGE) code or North Atlantic Treaty Organization (NATO) CAGE (NCAGE) code.

(c) Manufacturer Part Number

(d) Model Number

(2) The DLMS 947I Inventory Adjustment is used to update the Product/Service ID. It must include data elements of the item sent to the contractor and captured in the APSR (the 'original' Product/Service ID) and the Product/Service ID data elements after the upgrade (the 'new' Product/Service ID). Note that Manufacturer CAGE code and Manufacturer Part Number data elements must be sent together, as they are mutually inclusive.

(3) Contractors currently report Product/Service ID changes through the GFP Module via web-based user interface (i.e., Procurement Integrated Enterprise Environment (PIEE)). DoW APSR and DoW property systems must receive notification whenever a GFP item is updated or modified, including changes to the NSN, Manufacturer CAGE Code/Part Number, or Model Number. See Enclosure 4.

(4) The DLMS 947I can transmit up to four Product/Service ID updates on one transaction for any GFP items. These will be transmitted from PIEE to other APSRs via DAAS. Multiple NSNs cannot be updated simultaneously in a single transaction. Transaction capabilities are limited to processing a single GFP item, though up to four Product ID attributes for that single item may be updated concurrently.

3. CHANGE IN DETAIL:

a. Technical Details:

(1) Multiple concurrent inventory actions are often required to update GFP item Product/Service ID data elements, which exceeds the current single- or dual-change capability of the DLMS 947I Inventory Adjustment transaction.

(2) To ensure compliance with property accountability requirements and support accurate financial reporting, APSRs must be able to identify when a DLMS 947I serves as a Product/Service ID upgrade transaction and process the corresponding 'original' and 'new' Product/Service ID data elements accordingly.

b. Revised Transaction Flow:

(1) Once a Product/Service ID change is identified, the contractor will use the GFP Module through PIEE to generate an update of one or more Product/Service ID data elements, thereby creating a DLMS 947I.

(2) The DLMS 947I is transmitted to the APSR, or other property system, from the GFP Module using the code "M4 Department of Defense Routing Identifier Code (RIC)" 1/N103 to identify the APSR.

(a) All Product/Service ID related characteristics that are changing will be sent across on one transaction.

(b) The W19 segment will have up to two loops in one transaction to identify the 'original' and 'new' Product/Service ID information.

(3) W1901 will include “PC – Product Reserved for Customer” (a new qualifier) to identify this transaction as a Product ID update. There is not a legacy MILS equivalent to this transaction. See the example provided in 3.b.(3)(c) in addition to:

(a) The change to the GFP Product ID could potentially change any of the four Product/Service ID elements as identified in (2.b.(1)(a)-(d)).

(b) The W1916 segment will identify the IV (Inventory Update) – Original Information and IU Inventory Update – New Information.

(c) Example of a change to NSN using example product information:

W19*PC*50*EA**FS*123488888888*ZB*CAGE999*****IV
(Original)
N9*MF*Part1234
N9*MJ*Model444

(Mockup Transaction not shown in entirety.)

W19*PC*50*EA**FS*123411111111*ZB*CAGE333*****IU (New)
N9*MF*Part5678
N9*MJ*Model555

(Mockup Transaction not shown in entirety.)

4. IMPLEMENTATION TARGET: All trading partners will implement on their own development timeline, which is dependent on the service’s priorities.

5. TECHNICAL IMPACT:

a. Additions or Changes to Data Dictionary: There are new codes and segments implemented in this new implementation convention (IC) that have not previously been used in the existing DLMS 947I IC. See Enclosure 2.

b. Automated Information Systems (AIS):

(1) Consuming APSRs and property systems will need to be programmed to:

(a) Consume the transaction.

(b) Use the data to indicate the item is displayed in a manner appropriate for the property system.

(2) The following known APSRs and property systems, at a minimum, should evaluate the applicability of this change to their respective AIS, and prioritize implementation:

System Name	Responsible Component	DoW Information Technology Portfolio Repository Identification
Defense Medical Logistics-Enterprise Solution (DML-ES)	DHA	128
Comprehensive Engine Management System (CEMS) (D042)	U.S. Air Force	224
Enterprise Business System (EBS)	Defense Logistics Agency (DLA)	488
Enterprise Logistics Management System (ELMS)	DLA	3266
Global Combat Support System-Army (GCSS-ARMY)	U.S. Army	621
Global Combat Support System-Marine Corps (GCSS-MC)	U.S. Marine Corps	303
Logistics Modernization Program (LMP)	U.S. Army	232
Naval Operational Supply System (NOSS)	U.S. Navy	21534
Naval Tactical Command Support System (NTCSS)	U.S. Navy	299
Navy Enterprise Resource Planning (ERP)	U.S. Navy	802
Ordinance Information System (OIS)	U.S. Navy	727
Procurement Integrated Enterprise Environment (PIEE)	DLA	432
Reliability, Availability, and Maintainability for Pods (RAMPOD)	U.S. Air Force	213
Reliability and Maintainability Information System (REMIS)	U.S. Air Force	201
Theater Integrated Combat Munitions System (TICMS)	U.S. Air Force	26769
Corps of Engineers Financial Management System (CEFMS II)	U.S. Army	2775
Disposition Integration Web (DIW)	DLA	14243

c. Defense Automatic Addressing System (DAAS):

(1) DAAS will prioritize implementation of this new DLMS transaction to meet the timelines outlined in the Secretary of Defense memorandum regarding audits.

(2) DAAS will need formalized coordination with all trading partners before implementation. See Enclosure 4 for appropriate flow of transactions from PIEE to APSR.

6. PUBLICATION/POLICY IMPACT:

a. Defense Logistics Manual (DLM) 4000.25: DLM 4000.25, Volume 2, Chapter 7, Inventory Adjustments. See Enclosures 1 and 3.

b. Non-DLM 4000.25 Publications: N/A

7. ASSUMPTIONS: The changes detailed above regarding GFP 947I Inventory adjustment transactions are limited to currently established NSNs. The cataloging of new NSNs must continue to be routed through standard Federal Logistics Information System channels. In the event an NSN is absent from the receiving APSR, the corresponding materiel master must be built prior to reprocessing the transaction.

8. FINANCIAL IMPROVEMENT AND AUDIT REMEDIATION (FIAR), MATERIAL WEAKNESS, AND AUDIT-RELATED INFORMATION:

a. **Notices of Findings and Recommendations (NFR):** N/A

b. **Corrective Action Plan (CAP) References:** N/A

c. **Other FIAR, Material Weakness, and Audit-Related Information:** Reporting events that occur to government property in the possession of contractors to the DoW property systems is a key audit priority. The December 2024 Secretary of Defense Memorandum requires: *“Demonstrate 50 percent system development progress toward ensuring Reporting Entities’ APSRs and IMMS are compliant with integrating Government Furnished Property (GFP) data from the Procurement Integrated Enterprise Environment GFP Module via automated interface in accordance with DoDI 4161.02 no later than September 30, 2025.”*

9. END-TO-END TESTING REQUIREMENTS: Testing between the GFP Module and property systems will be coordinated with DAASTesting@dla.mil before the GFP Module can transmit the new requirements listed in this change to any APSR or property system.

10. REFERENCE: Secretary of Defense Fiscal Year 2025 Financial Statement Audit Remediation Priorities, December 07, 2024.

Enclosure 1

Due to the multiple combinations of the four possible data elements, and in addition to the Defense Logistics Management Standard (DLMS) note, the Government Furnished Property matrix in this enclosure shows the precedence and locations of the possible data combinations.

Identifier(s)	Data Element(s)	W1905	W1906	W1907	W1908	N901	N902
One	NSN	FS	NSN	–	–	–	–
One (cont.)	MFR CAGE / P/N	MG	P/N	ZB	CAGE	–	–
One (cont.)	M/N	MN	M/N	–	–	–	–
Two	NSN and MFR CAGE / P/N	FS	NSN	ZB	CAGE	MF	P/N
Two (cont.)	NSN and M/N	FS	NSN	–	–	MJ	M/N
Two (cont.)	MFR CAGE / P/N and M/N	MG	P/N	ZB	CAGE	MJ	M/N
Three	NSN, MFR CAGE / P/N, M/N	FS	NSN	ZB	CAGE	MF	P/N
Three (cont.)	NSN, MFR CAGE / P/N, M/N	–	–	–	–	MJ	M/N

Key:

Red font (with grid pattern): New data element to be added to proposed DLMS change (PDC).

Yellow shading (with diagonal lines): Will result in adding data elements.

Purple font (with horizontal lines): In PDC as a DLMS note change only; data element is already there.

The ‘–’ indicates non-applicable.

Note: MFR CAGE Code and P/N are two separate data elements that are always sent together.

Acronyms:

Commercial and Government Entity Code (CAGE)

Manufacturer (MFR)

Model Number (M/N)

National Stock Number (NSN)

Part Number (P/N)

Enclosure 2

Revise the following Defense Logistics Management Standards (DLMS) Implementation Conventions (ICs) as shown. Additions are identified by **bold red** font.

#	Location	DLMS 4030 947I Inventory Adjustment	Reason
1.	Introductory Notes	Add ADC 1515 to DLMS Introductory Note 6: - ADC 1515, Inventory Adjustment to support Government Furnished Property and updates to the Product/Service ID.	To identify changes made to the ICs.
2.	2/W1901/200	Add the following code and DLMS note: PC – GFP Materiel is Changing DLMS Note: 1. Must Use when GFP materiel is changing multiple characteristics to include NSN, Manufacturer CAGE code, Part Number, Model Number. There is no legacy MILS equivalent – est. 2026. 2. Per ADC 1515, this W1901 can add up to two W1901 loops.	Require new code and DLMS note for Government Furnished Property (GFP) use.
3.	2/W1907/0200	Add the following DLMS note: ZB – Commercial and Government Entity (CAGE) Code DLMS Note: 3. When adjusting GFP, 2/W1907/0200 “ZB” qualifier code must always be sent with Manufacturer’s Part Number (2/W1905/0200 “MG” qualifier code or 2/N901/0400 “MF” qualifier code). Please refer to ADC 1515.	Clarify for GFP use.
4.	2/W1916/200	Add the following code and DLMS note: IV Inventory Update – Original Information DLMS Note: 1. When W1901 is “PC,” use to indicate original information (e.g., NSN, Manufacturer CAGE code, Part Number, Model Number). 2. Approved for use in X12 version 8060.	Require new code and DLMS note for GFP use.
5.	2/W1916/200	Add the following code and DLMS note: IU Inventory Update – New Information DLMS Note: 1. When W1901 is “PC,” use to indicate new information (e.g., NSN, Manufacturer CAGE code, Part Number, Model Number). 2. Approved for use in X12 version 8060.	Require new code and DLMS note for GFP use.

#	Location	DLMS 4030 947I Inventory Adjustment	Reason
6.	2/N901/1600	<u>Update the following code DLMS note:</u> SE Serial Number DLMS Note: Use to identify the serial number when UII is not required. If UII is required in addition to the serial number, enter the serial number in N907. The serial number may not exceed 30 characters and may only include alpha numeric characters, dashes and forward slashes. Spaces are not allowed. Must be present for GFP related inventory adjustments when “PC” is used in W1916.	Require clarification for serial numbers used on GFP related inventory changes.

Enclosure 3

Revise the Defense Logistics Manual (DLM) 4000.25, Volume 2, Chapter 7, Inventory Adjustments as follows. Changes are identified in **bold red** font and deletions by **red strikethrough** text. Renumber as necessary and spell out acronyms only when not previously defined within the chapter.

(Entire table not shown.)

Table C7.T1. DLSS DIC/DLMS Quantity or Status Adjustment Reason Code Correlation

W1901 Quantity or Status Adjustment Reason Code	Explanation	Corresponding MILSTRAP Legacy DIC
IV	GFP Inventory Update – Original Information. Decrement of original NSN, Manufacturer CAGE code, Part Number, and/or Model Number.	Not applicable to legacy MILSTRAP.
IU	GFP Inventory Update – New Information. Gain of new NSN, Manufacturer CAGE code, Part Number, and/or Model Number.	Not applicable to legacy MILSTRAP.

C7.1.3. Adjustment Actions. DLMS provides ~~two~~ **multiple** methods for effecting adjustments – single, dual, **and multi actions**.

(Intervening text not shown.)

C7.1.3.4. Multi-GFP Adjustment. As GFP materiel is upgraded, modified, or remanufactured, the 947I can accommodate multiple (up to four) actions in one transaction. These data elements include: NSN, Manufacturer Commercial and Government Entity (CAGE) code, Part Number, and/or Model Number. The Manufacturer's CAGE code and Manufacturer Part Number data elements will always be sent together.

**Table C7.T2. GFP Multi-Adjustment Qualifier Examples
(W19 – Max Use 1; N9 – Max Use 10)**

Identifier(s)	Data Element(s)	W1905	W1906	W1907	W1908	N901	N902
One	NSN	FS	NSN	–	–	–	–
One (cont.)	MFR CAGE / P/N	MG	P/N	ZB	CAGE	–	–
One (cont.)	M/N	MN	M/N	–	–	–	–
Two	NSN and MFR CAGE / P/N	FS	NSN	ZB	CAGE	MF	P/N
Two (cont.)	NSN and M/N	FS	NSN	–	–	MJ	M/N
Two (cont.)	MFR CAGE / P/N and M/N	MG	P/N	ZB	CAGE	MJ	M/N
Three	NSN, MFR CAGE / P/N, M/N	FS	NSN	ZB	CAGE	MF	P/N
Three (cont.)	NSN, MFR CAGE / P/N, M/N	–	–	–	–	MJ	M/N

Key:

Red font (with grid pattern): New data element to be added to proposed DLMS change (PDC).

Yellow shading (with diagonal lines): Will result in adding data elements.

Purple font (with horizontal lines): In PDC as a DLMS note change only; data element is already there.

The ‘—’ indicates non-applicable.

Note: MFR CAGE Code and P/N are two separate data elements that are always sent together.

Table C7.T3. Sample Data – ASC X12 EDI Example of W19 and N9 Segments Under DLMS 947I Version 004030 for GFP Modifications

EDI Expression (Mockup transaction not shown in entirety; new qualifiers are highlighted.)	Meaning
W19* PC *50*EA**FS* 1234888888 *ZB*CAGE999***** IV ^	Warehouse Adjustment Item Detail segment (W19) using Product Reserved for Customer code (PC) to indicate there is an update to the GFP materiel and detailing out original Product ID data (IV).
N9*MF*Part1234^	Reference Identification (N9) segment with Part Number detailed (MF).
N9*MJ*Model444^	Reference Identification (N9) segment with Model Number (MJ).
W19* PC *50*EA**FS* 1234111111 *ZB*CAGE333***** IU ^	Warehouse Adjustment Item Detail segment (W19) using Product Reserved for Customer code (PC) to indicate there is an update to the GFP materiel and detailing out New Product ID data (IU).
N9*MF*Part5678^	Reference Identification (N9) segment with Part Number detailed (MF).
N9*MJ*Model555^	Reference Identification (N9) segment with Model Number (MJ).

Enclosure 4

The Government Furnished Property (GFP) handshake and possible attributes that can be updated using the GFP Module are detailed below.

GFP Item Update Process Flow

Step	System	Process
1.	Procurement Integrated Enterprise Environment (PIEE)	Contractor reports Product Identification (ID) update through the GFP Module.
2.	Defense Automatic Addressing System (DAAS)	947I is transmitted with 'PC' qualifier. Routing is based on Routing Identifier Code of property system.
3.	Accountable Property System of Record (APSR)	Decrement of original GFP Product ID data elements, followed by gain of new GFP Product ID data elements.



Enclosure 5

OFFICIAL COMPONENT RESPONSE FORM FOR PDC 1515				
#	Location (Page/ Para)	Critical or Substantive	Comments, Justification, Recommended Change(s) and Defense Enterprise Data Standards Office (DEDSO) Justification for Resolution	Point of Contact
1.	N/A	N/A	Component Comment and Justification: Concur with comment. Component Recommended Change: DEDSO will need to make changes to the XML schema to support these changes. DEDSO Response: Accept. DEDSO Reasoning: XML Schema will be updated as ADC is approved and 4050 version is maintained.	Name: DAAS, Pablo Gomez Phone: (445) 737-0095 E-mail: pablo.gomez@dla.mil ☐ Same as initial comment row above.
2.	Overall	Substantive	Component Comment and Justification: Concur with comment. Will there be two loops for the W1901/PC segment? (W1916/IV and W1916/IU) or will there be two separate transactions? Component Recommended Change: Insert recommendation. DEDSO Response: Accept. DEDSO Reasoning: There will be two '300' loops, which include the W19 segments. One transaction two 300 loops to include the W19 segment. When a 947I Inventory Adjustment is sent with a code of W1901 = PC then, two W1916 segments will be sent in two separate 300 loops in one transaction.	Name: USAF, HAF/A4LR, Rodney Smith Phone: E-mail: rodney.smith.37@us.af.mil ☐ Same as initial comment row above.
3.	Overall	Substantive	Component Comment and Justification: Concur with comment. Although the DLMS 947I is financially relevant in that it supports financial reporting, DAI does not currently leverage the transaction. With the possibility of DAI incorporation of DLMS transactions to support various business events, this change does not directly impact a financial event but is needed to support overall financial reporting. Component Recommended Change: N/A DEDSO Response: Accept. DEDSO Reasoning: N/A	Name: USMC, Chris Messineo Phone: 571-256-7860 E-mail: Christopher.messineo@usmc.mil ☐ Same as initial comment row above.

OFFICIAL COMPONENT RESPONSE FORM FOR PDC 1515				
#	Location (Page/ Para)	Critical or Substantive	Comments, Justification, Recommended Change(s) and Defense Enterprise Data Standards Office (DEDSO) Justification for Resolution	Point of Contact
4.	Overall	Critical	Component Comment and Justification: Concur with comment. I understand that need to update the information for any GFP assets being held in the APSR. What I am not clear on from the documentation. The assumption from the PDC is there is some inventory that has already been loaded to the APSR? Component Recommended Change: 1. How did the GFP inventory originally get to the APSR in the first place? 2. How did the technical data get loaded? ELMS technical data loads are very complicated, and the four elements mentioned do not suffice. 3. Was a 527D/DW*/DU* Preposition Material Receipt (PMR) transmitted prior to shipping? 4. Any changes to the National Stock Number or Stock Item number (ELMS) that results in a change to the inventory balance, for the Marine Corps, requires the Accountable Officer (AO) or Accountable Property Officer (APO) to sign a Money Value Gain or Lost (MVGL) notice. 5. If the National Stock Number or Stock Item number (ELMS) changes the warehouse must be notified to remark the asset. 6. Demand data capture when you change National Stock Number or Stock Item number (ELMS) would require going through history and changing the old identifier to a new identifier. For future stock and initial issue provision this is a must. 7. Did not address if there is a change to Serial number or IUID. DEDSO Response: Accept. DEDSO Reasoning: Changes indicated by green shading.	Name: USMC, David Dougherty Phone: (229) 639-6854 E-mail: david.a.dougherty@usmc.mil ☐ Same as initial comment row above.
5.	Overall	Critical	Component Comment and Justification: Let's talk more about cataloging. The services are bad about not properly cataloging new parts and obtaining Correct NSN data structures. This process outlined in the document creates even more complexity in accounting for equipment in our APSRs. Component Recommended Change: 1. A new item should be cataloged and assigned a local stock number in this process. Remember there is a minimum amount of technical information required to establish an NSN in FLIS. 2. Once an NSN is established, then is later changed a phase code of "A" can be used to identify the replace the old with a new NSN. Phrase of "E" will work also. By not assigning a MILSTRIP cross reference, the services have no direct means to inquire LDG to see transmission X12 DLMS transactions. During research our analysts need the ability to see the COMMRI to and from recorded in the transmission packages. This also needs to be addressed. DEDSO Response: Accept. DEDSO Reasoning: Changes indicated by green shading.	Name: USMC, David Dougherty Phone: (229) 639-6854 E-mail: david.a.dougherty@usmc.mil ☐ Same as initial comment row above.

OFFICIAL COMPONENT RESPONSE FORM FOR PDC 1515				
#	Location (Page/ Para)	Critical or Substantive	Comments, Justification, Recommended Change(s) and Defense Enterprise Data Standards Office (DEDSO) Justification for Resolution	Point of Contact
6.	Page 4, Part 6	Substantive	Component Comment and Justification: RFO DFARS mentions DOD Procurement toolbox at clause 252-245-7005 which has the GFP module. Component Recommended Change: The clauses and information in the module will need to be updated with the new clauses. The resource guides on the site will need to be updated with the changes. DEDSO Response: Accept. DEDSO Reasoning: DEDSO acknowledges response.	Name: DLA, Jonathan Keller Phone: (445) 737-3508 E-mail: jonathan.keller@dla.mil ☐ Same as initial comment row above.
7.	Overall	Substantive	Component Comment and Justification: 1. The PDC must indicate it only applies to serially managed items. 2. PDC language should be very clear that each inventory adjustment using this process will be against a single item. This process does not authorize the transmission of multiple inventory adjustments in a single transaction. 3. Revise the X12 example to reflect a cataloged NSN vs an LSN. Component Recommended Change: Make updates as discussed with Rafael Gonzalez Castro. DEDSO Response: Accept. DEDSO Reasoning: 1. Changes indicated in green shading in 2.2. 2. Changes indicated in green shading 2.2. 3. Updates made in 3.b.3.c and Enclosure 3 to remove the 'NSN' letters to not cause confusion.	Name: DLA, Rafael Gonzalez Castro Phone: (717) 731-2028 E-mail: rafael.gonzalez@dla.mil ☐ Same as initial comment row above.
8.	Overall	Substantive	Component Comment and Justification: Concur without Comment Component Recommended Change: N/A DEDSO Response: Accept. DEDSO Reasoning: DEDSO confirms receipt.	Name: USN, Gerald O' Sullivan Phone: (717) 605-5974 E-Mail: gerald.f.sullivan.civ@us.navy.mil ☐ Same as initial comment row above.