

# CLIENT ALERT

## GSA Transactional Rule Pilot Program – Understanding the Seismic Shift

August 29, 2016

The GSA's Transactional Data Rule Pilot Program has been rolled out for certain schedules, but many questions remain for contractors, including the logistical challenges related to the monthly compilation of data, the ability of GSA contracting officers to compare products and services accurately as the agency moves from commercial pricing to horizontal pricing analysis, and the areas of potential liability under this new program. [This article by C&M attorneys](#), published in Bloomberg BNA, provides a detailed explanation of the new rule and practical considerations for government contractors.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

**Lorraine M. Campos**

Partner – Washington, D.C.  
Phone: +1.202.624.2786  
Email: [lcampos@crowell.com](mailto:lcampos@crowell.com)

**Alan W. H. Gourley**

Partner – Washington, D.C.  
Phone: +1.202.624.2561  
Email: [agourley@crowell.com](mailto:agourley@crowell.com)

**Adelicia R. Cliffe**

Partner – Washington, D.C.  
Phone: +1.202.624.2816  
Email: [acliffe@crowell.com](mailto:acliffe@crowell.com)