

## CLIENT ALERT

### 'Page-Count' Method Supports Claim For Reimbursement Of Protest Costs

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Despite the agency's blanket objections to almost all of a prevailing protester's claimed costs, the Government Accountability Office ("GAO") in *BAE Technical Services, Inc. - Costs*, B-296699.3 (Aug. 11, 2006), <http://www.gao.gov/decisions/bidpro/2966993.pdf>, held that the protester was entitled to recover costs attributed to almost all of the issues raised as they are "largely intertwined parts of [its] basic objection that the [agency] misevaluated proposals and treated offerors unequally." Although the records of the time spent on the protest were not detailed enough to attribute time on an issue-by-issue basis, GAO relied on the application of a "page-count" method to conclude that approximately 94.5 percent of the number of pages in submissions to GAO were devoted to issues related to the meritorious protest allegations. For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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