



December 17, 2019

Honorable Carolyn B. Maloney
Chairwoman
Committee on Oversight and Reform
United States House of Representatives
2157 Rayburn House Office Building
Washington, DC 20515

Honorable Jim Jordan
Ranking Member
Committee on Oversight and Reform
United State House of Representatives
2105 Rayburn House Office Building
Washington, DC 20515

Honorable Gerald Connolly
Chair
Subcommittee on Government Operations
United States House of Representatives
2157 Rayburn House Office Building
Washington, DC 20515

Honorable Mark Meadows
Ranking Member
Subcommittee on Government Operations
United States House of Representatives
2105 Rayburn House Office Building
Washington, DC 20515

Internet Association Supports Comprehensive FedRAMP Reform

Dear Members of the Committee:

Thank you for considering the Federal Risk and Authorization Management Program (FedRAMP) Authorization Act of 2019 as part of the Committee on Oversight and Reform markup this week. On behalf of the internet economy, I am writing to highlight a few issues of particular importance to our member companies as their technologies are implemented across government.

Internet Association (IA) represents over 40 leading internet companies and supports policies that promote and enable internet innovation, including commercial cloud solutions. Our companies are global leaders in the drive to develop lower cost, more secure, scalable, elastic, efficient, resilient, and innovative cloud services to customers in both the private and public sectors.

IA members have invested a tremendous amount of time and resources into working with the FedRAMP team over the past decade to secure authorizations for a variety of services, and we are committed to strengthening the program whenever opportunities arise. We have also collaborated with GSA to improve program administration, and appreciate Congress' willingness to focus on further reforms for the office.

The FedRAMP bill under consideration by your committee contains three key policy areas that are important to cloud service providers: it reinforces the program as the preeminent accreditation standard for the federal government by encouraging a presumption of adequacy,



formalizes channels for the stakeholder community to provide feedback and input on the program especially before policy changes and requirements are defined and finalized, and authorizes necessary funding for the program to make key investments in personnel and automation.

FedRAMP has served as an important tool for both government and industry. The FedRAMP program has led to over 1,100 reuses of cloud security authorization packages, and had led to an estimated \$285 million in cost avoidance for the federal government.

Given the impact of the FedRAMP program on procurement, security, and IT modernization, the proposed \$25 million annual funding authorization is needed to ensure program staff are able to deliver program outcomes. This funding level also ensures that future increases in overhead fees from GSA, Federal Acquisition Service, and Technology Transformation Services' front office functions won't adversely impact the program's ability to issue cloud authorizations or otherwise slow down the office by starving it of resources.

There are a few ways the current bill can be strengthened to allow greater program evolution and success going forward. Specifically, we would like to ensure that the PMO and JAB seek out industry input for the duration of the program in a proactive way prior to releasing fully-baked policies, guidance and requirements for comment, that the advisory committee's feedback makes a meaningful difference in the continued evolution of the program, and that this legislation increases reusability of authorizations and SSP packages across the executive branch. We look forward to working with the Committee on these aspects.

We applaud the bipartisan effort to modernize delivery of citizen services and agency operations using commercial cloud computing, and these changes will have a lasting impact on Americans for years to come.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Beckerman'.

Michael Beckerman
President and CEO