



July 15, 2025

The Honorable Nick LaLota
Chairman
Subcommittee on Contracting and Infrastructure
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Gil Cisneros
Ranking Member
Subcommittee on Contracting and Infrastructure
U.S. House of Representatives
Washington, D.C. 20515

Re: Statement for the Record - "Leveling the Playing Field: Fostering Opportunities for Small Business Contractors"

Dear Chairman LaLota and Ranking Member Cisneros,

As a long-time small business contractor, I respectfully urge the Subcommittee to recognize that structural imbalances—not merit—are excluding qualified firms from federal awards. I believe that by moving ANC's and Joint Ventures into their distinct procurement lanes, the Committee would restore competitive fairness and eliminate the most egregious cases of abuse. The current practice of allowing ANC's to create an unlimited number of 8(a) companies—indefinitely—ultimately burdens the American taxpayer.

Bridges System Integration LLC (Bridges SI) is a proven federal small business contractor with over 15 years of experience in highly secure, mission-critical environments. We have performed audiovisual and IT integration work for nearly every department in the federal space. Despite holding every significant quality certification (ISO 9001, ISO/IEC 27001, ISO 20000-1, and CMMI), maintaining a DFARS-compliant cost accounting system, and having a facility clearance, we have found it nearly impossible to compete for prime contracts on recent major small business vehicles, such as Polaris and SEWP VI.

Polaris required past performance as a prime contractor for a minimum of three (and up to five) task orders, each valued at over \$10 million. Given the selected NAICS code—with a \$34 million small business size standard—these requirements meant that even qualifying would likely exceed the annual revenue thresholds that define a small business. These scoring mechanics reward scale, not capability.

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The bar was so high that the only path to eligibility was through access to a billion-dollar parent ANC or a JV, effectively disqualifying the vast majority of genuine small businesses.

We engaged a professional team, submitted a compliant proposal, and met all other scoring criteria—but GSA informed us in its official debrief: "Your proposal was not evaluated because it did not rank in the Top 100." This was due solely to our lack of past performance on large prime contracts—the very thing we are trying to attain through opportunities like Polaris.

The winners on Polaris and similar vehicles are often ANC-owned entities or joint ventures that operate with the resources, past performance, and institutional support of billion-dollar enterprises. These parent companies routinely establish new 8(a)s under the same address and staff, benefiting from an unlimited history of past performance and access to sole-source contracts. At the same time, we fight for scraps as subcontractors.

In practice, ANC subsidiaries frequently change their names and organizational structures, creating confusion around contracts and invoicing, not out of malice or disorganization, but because the regulatory environment incentivizes the constant creation of subsidiaries. This creates unnecessary administrative friction, obscures accountability, and illustrates how present rules have turned federal procurement into a game—one designed to create the illusion of small business awards, when in reality, the government is only awarding to very large businesses.

Our ANC partners have informed us that they no longer pursue prime teaming arrangements. Instead, they opt to award subcontracts only after winning, thereby denying small businesses the ability to demonstrate relevant past performance. The result is a self-reinforcing loop where only ANC or JV-controlled entities accrue the past performance points needed to win future awards.

SEWP VI Category B similarly required three \$5M+ awards under NAICS 541512, despite the size standard capping small business revenue at \$34 million. Again, this favors entities backed by aggregated corporate histories, thereby undermining the intent of small business set-asides by sidelining actual small business participation.

Policy Recommendations

1. Impose reasonable caps on the number of 8(a) entities per ANC parent company or limit aggregate revenue under common control.
2. Reassess sole-source award thresholds and apply consistent rules across all 8(a) firms.
3. Create set-aside pathways specifically for general small businesses without socio-economic designation.

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4. Improve transparency in subcontracting participation, with more precise tracking and credit for past performance.
5. Ensure teaming arrangements are encouraged—not restricted—so that small businesses gain prime experience.
6. Revise scoring models in major IDIQ/GWAC solicitations to avoid structurally excluding firms based solely on past prime performance or size metrics.

Small business policy must reward true competition, not administrative maneuvering. As it stands, the system favors layered holding companies and scoring gymnastics over entrepreneurial capability and long-term performance. This not only inflates costs and obscures accountability, but it ultimately erodes trust in the integrity of federal procurement.

Thank you for your time and consideration. I am available to provide further information or testimony as needed.

Sincerely,

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