

From: Center for Equal Opportunity, Roger Clegg
Proposal: FR 2082; RFP & RFPQ (ICP 2015-19;PUB'D 07/23/2015)
Subject: FR 2082; RFP & RFPQ

Comments:

July 24, 2015

To: Federal Reserve

From: Roger Clegg
President and General Counsel
Center for Equal Opportunity
Re: 7100-0180 (80 FR 43777) (7/23/2015 Proposed Agency Information
Collection Activities; Comment Request)

It's important to make sure contracting programs are open to all, that bidding opportunities are widely publicized beforehand, and that no one gets discriminated against because of skin color, national origin, or sex. But that means no preferences because of skin color, etc. either--whether it's labeled a "set-aside," a "quota," or a "goal," since they all end up amounting to the same thing. Such discrimination is unfair and divisive; it breeds corruption and otherwise costs the taxpayers and businesses money to award a contract to someone other than the lowest bidder; and it's almost always illegal--indeed, unconstitutional--to boot (see 42 U.S.C. 2000d, 42 U.S.C. section 198, and this model brief: [[http document.doc?id="454"](http://document.doc?id=454)]
<http://www.pacificlegal.org/document.doc?id=454>). This should be made clear to all involved in this program.