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ACQUISITION,
TECHNOLOGY
AND LOGISTICS

ACQ FYI 03-031

November 26, 2003

MEMORANDUM FOR: SEE DISTRIBUTION

SUBJECT: Update to Policy for Unique Identification (UID) of Tangible Items – New Equipment, Major Modifications, and Reprocurements of Equipment and Spares

This policy update to the "Policy for Unique Identification (UID) of Tangible Items – New Equipment, Major Modifications, and Reprocurements of Equipment and Spares", dated July 29, 2003, will address clarifications including approval of specific Department of Defense (DoD) UID equivalents. Additionally, UID policy guidance continues to be updated in "The Department of Defense Guide to Uniquely Identifying Items, Version 1.3" dated November 25, 2003. This Guide will be periodically updated, and the updates will be available at http://www.acq.osd.mil/uid. Each update will supersede the previous version of the Guide, and users will refer to the most current version available for assistance in complying with the UID policy.

A commercial identifier can be considered for use as a DoD UID equivalent if it meets all of these criteria: (1) Must contain an enterprise identifier, (2) Must uniquely identify an individual item within an enterprise identifier, product or part number, and (3) Must have an existing Data Identifier (DI) or Application Identifier (AI) listed in American National Standard (ANS) MH10.8.2, Data Identifier and Application Identifier Standard. The commercial unique identifiers meeting these criteria that the Department recognizes as UID equivalents are the EAN.UCC Global Individual Asset Identifier (GIAI) for serially-managed assets, the EAN.UCC Global Returnable Asset Identifier (GRAI) for returnable assets, and the ISO Vehicle Identification Number (VIN) for vehicles. In addition to these equivalents, the data requirements of 14 CFR Part 45, Identification and Registration Marking, for only aircraft, aircraft engines, propellers, and propeller blades and hubs are consistent with the data elements required by our UID constructs.

The DFARS Interim Rule on "Unique Item Identification and Valuation" was published in the Federal Register on October 10, 2003. One provision of this rule is for contracts to include a requirement for commonly accepted commercial marks if it is determined that unique item identification or a DoD recognized unique identification equivalent is not required, and unique item identification is not already marked. In these cases where it is not necessary to distinguish between individual items of a product,

commercial marks such as the EAN.UCC Global Trade Identification Number (GTIN) (i.e., Universal Product Code (UPC)), ANSI T1.220 COMMON LANGUAGE® Equipment Identification (CLEI) for telecommunications equipment, and the Health Industry Business Communications Council (HIBCC) code for non-pharmaceutical health-care products can be used. These identifiers are not considered DoD UID equivalents but will be accepted by DoD as commonly accepted commercial marks when unique identification is not required.

The following addresses specific implementation issues that have recently surfaced:

a. UID constructs require the use of an Issuing Agency Code (IAC) that identifies the authority that issues enterprise identifiers. The Contractor and Government Entity (CAGE) code presently has no IAC. Efforts to request an IAC for the CAGE code are underway and are awaiting a vote by ISO Sub Committee 31 (SC31), Automatic Data Capture. As part of the request, a liaison between NATO Allied Committee 135, National Directors of Codification, and SC31 is being sought. DoD expects this process to be complete and an IAC for CAGE established no later than March 1, 2004. Until the IAC for CAGE is determined, entities required to provide a UID cannot use CAGE as the enterprise identifier component of the UID.

b. While orders under Basic Ordering Agreements (BOA) are considered to be solicitations, BOAs awarded before January 1, 2004 may not have UID requirements. The UID policy strongly encourages Component Acquisition Executives to incorporate UID requirements into ongoing contracts where it makes business sense to do so. Since BOAs awarded before January 1, 2004 would be an ongoing agreement, UID requirements can be included in orders issued under the BOA whenever the program/item manager determines it is feasible to do so.

c. Purchases initiated by DoD and executed through the General Services Administration (GSA) or another federal agency shall comply with the UID policy.

d. There is only one authorized method to use in solicitations to specify encoding for UID syntax for automatic data capture in order to achieve interoperability in business intelligence. The method is defined in ISO/IEC 15434 – Information Technology – Syntax for High Capacity Automatic Data Capture Media. Because ISO/IEC 15434 does not provide a format code for Text Element Identifiers, a DoD UID approved method of semantics, DoD will accept a format code of "DD" for interim use until a format code for Text Element Identifiers is approved by ISO JTC 1 SC 31.

e. An enterprise is the entity responsible for assigning the unique identifier to an asset. The enterprise identifier of the enterprise that assigned the serial number to the item is the only enterprise identifier in the UID machine-readable code that can use a

UID data qualifier for enterprise identifier. The enterprise may be an organization other than the manufacturer, such as a supplier, depot, program manager, or a third party. The enterprise is responsible for ensuring that the serial number is unique within the enterprise identifier (for UID Construct #1) or unique within the original part number (for UID Construct #2).

f. There are three authorized categories of data qualifiers available for use as semantics when encoding the UID syntax. These data qualifiers are:

- Application Identifiers (Format 05 of ISO/IEC 15434)
- Data Identifiers (Format 06 of ISO/IEC 15434), and
- Text Element Identifiers (Format "DD" of the DoD collaborative solution. The DoD collaborative solution is described in Appendix D of the DoD Guide to Uniquely Identifying Items, available at http://www.acq.osd.mil/uid.)

Data Identifiers and Application Identifiers shall be taken from ISO/IEC 15418, Information Technology – EAN/UCC Application Identifiers and ASC MH 10 Data Identifiers and Maintenance. Text Element Identifiers shall be limited to the minimum set necessary to comply with either UID Construct #1 or #2 and shall be taken from the DoD collaborative solution. The following Text Element Identifiers may be used: CAGE (CAG), DUNS (DUN), EAN.UCC (EUC), Serial Number within Enterprise (SER), Serial Number within Original Part Number (SEQ), Original Part Number (PNO) Current Part Number (PNR), and Unique Identifier (UID).

Additional information and the DoD Guide to Uniquely Identifying Items are at http://www.acq.osd.mil/uid. The point of contact is Mr. Robert Leibrandt. Please address your questions to him at (703) 695-1099 or by email at robert.leibrandt@osd.mil.

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