



November 16, 2014

The Honorable Charles Grassley
United States Senate
Washington, DC 20510

Dear Senator Grassley:

S.2520, The FOIA Improvement Act of 2014, is of paramount interest to my company, AINS. As the leading vendor of FOIA request processing software technology in North America the outcome of this legislation directly impacts our many Federal government customers and the many employees of AINS who build and support FOIAXpress. Altogether, AINS provides FOIAXpress to over 300 Departmental components and small agencies supporting 10,000+ Federal FOIA case workers.

I am primarily concerned about any requirement in this legislation pertaining to a single Federal website or portal for the public to submit and track FOIA requests. For the past 18 months, I have been urging members of Congress to ensure that such a website be constructed and operated to support interoperability between a centralized website and other FOIA request processing software used by departments and offices within the Federal government. Interoperability standards are essential to protect the current investment made in FOIA technology and software training by the Federal government and to foster an environment of competitive innovation.

I am also concerned about on-going efforts by certain Federal agencies to develop and sell their own FOIA processing software to other Federal agencies when the private sector provides a variety of commercial solutions available for purchase. In essence, these agencies are engaging in commercial activities that are in direct competition with small businesses like AINS who create well-paying jobs and pay taxes. Furthermore, the lack of oversight and accountability of these commercial-related activities distort any sense of a level playing field regarding their true product development, marketing and support costs.

In conclusion, I want to thank you for your consideration of my viewpoint on this matter and request that my comments be added to the record concerning S.2520. I believe it is an important issue, and would like to see the legislation pass to ensure and enforce interoperability standards for any proposed centralized FOIA website.

Sincerely,

A handwritten signature in blue ink that reads "David Kruger".

David Kruger, Vice President