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The Clause You Already Signed

Three of this week's four biggest items are not solicitations — they are **terms**. A GSA AI clause went live on October 19 and attaches to every new task and delivery order on Schedule. A DHS supply-chain order published October 20 reaches past a named vendor into anything "developed using DeepSeek implementations," which means your software bill of materials, not your vendor list. And a Treasury rule published **this morning** makes quantum a prohibited sector outright, with no notification path. Meanwhile the capture calendar is cruel: the Army's $7.6 billion HR suite takes draft comments until **5 p.m. Eastern today**, and the December 11 funding cliff — the CR, the Technology Modernization Fund's authorization, and the cyber information-sharing liability shield, all on one date — moved not one inch last week.

TODAY	Nov 4	Nov 19	Dec 7	Dec 11	Dec 19
5 P.M. ET	3 P.M. ET	COMMENTS	COMMENTS	LAPSE	180 DAYS
Army HR Solutions GEN VI draft RFP comments — $7.6B across two vehicles	VA MOSAIC sources-sought responses, 25-page cap	FedRAMP RFC-0036, 20x Class D cloud pilot	Treasury outbound-investment rule — quantum prohibited	CR, TMF authorization and CISA 2015 all expire together	EO 14412 FAR proposed rule on FIPS/PQC due

CHANGED SINCE LAST WEEK

- **Correction — Next Gen IAC MAC.** Our October 19 edition described the successor to the Defense Technical Information Center's research vehicle as a **$48 billion** program. That figure is the ceiling of the **current** IAC-MAC, opened in 2018 — not the successor. Washington Technology, reporting October 15 from the industry-day flyer, says Next Gen IAC MAC is poised for a ceiling **north of $80 billion**. The flyer figure is prospective and no solicitation has published. Industry day is **October 30**; RSVPs closed **today**. The current vehicle sunsets April 2028.
- **The December 11 cliff: no movement.** We flagged it on October 19 and it is worth restating precisely because nothing happened. No appropriations action occurred between October 19 and today; Congress is in pre-midterm recess. The continuing resolution, the Technology Modernization Fund's authorization and the Cybersecurity Information Sharing Act of 2015 still share one expiration date, with a November 3 election between now and it. Assume a compressed lame duck.
- **FedRAMP opened a second comment window.** Last week we carried RFC-0035 (comments close November 17). RFC-0036 — the **20x Class D cloud-hosted pilot**, FedRAMP's highest assurance tier — opened October 15 and closes **November 19**. Two deadlines, two days apart, different documents.

01 In force AI ACQUISITION

A GSA clause governing how your software touches a language model took effect October 19 — and it is a class deviation, not a rule

GSAR 552.239-7001 | Effective Oct 19, 2026 | Memo RGO-2026-01 | 72-hour notice | 25% cap

GSA's clause **552.239-7001, "Basic Safeguarding of Data within Large Language Model Artificial Intelligence Systems,"** took effect **October 19, 2026** and applies to **all new task and delivery orders issued after that date**. It arrives by **class deviation** — memo RGO-2026-01, signed by Senior Procurement Executive Jeffrey A. Koses — and **not** by Federal Register rulemaking. Notice-and-comment GSAR rulemaking is still ahead.

- **Data ownership flips.** The government owns Government Data and Custom Developments. You get a limited, revocable license for performance and cybersecurity purposes, and you may **not** use Government Data to train, fine-tune or improve any model, inform business decisions, or sell or license it.

- **Three separate clocks.** 72 hours to notify the contracting officer on actual knowledge of a material violation; 7 calendar days on a material change that increases bias or weakens guardrails.
- **A liability cap that is narrower than it reads.** Decommissioning costs are capped at **25% of the affected task or delivery order** following a **for-cause** termination — not a termination for default — and the cap **excludes re-procurement and replacement-system costs**.
- **Flow-down with attestations** to any subcontractor handling Government Data, a stated preference for U.S.-developed and U.S.-operated models, and government rights to run automated bias and truthfulness assessments.
- **Two carve-outs.** Contractor-internal systems not delivered to or accessed by the government, and LLM functionality incidental to a product's primary purpose. The line between "material feature" and "incidental" is genuinely unsettled.

Watch the label. At least one law firm published this under the headline "GSA Issues Final Rule on Large Language Model Procurements" while its own article body correctly calls it a regulation deviation. A deviation and a final rule have different durability and different challenge paths; do not brief your executives off the headline.

SO WHAT

This is the widest-reach item of the week — it touches every Schedule holder whose product has material model functionality, which by 2026 is most of them. Two things to do now: document where and how your delivered systems use LLMs so you can defend a "material feature" determination later, and get upstream documentation and attestation rights into your OEM and subcontractor agreements **before** the next order drops. The clause is already live; the only question is whether you find out on your terms or during a CO's inquiry.

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02 Due today SERVICES CAPTURE

The Army's $7.6 billion HR suite takes draft-RFP comments until 5 p.m. Eastern today

RMAS $1.5B small biz | PLS $6.09B full & open | Oct 26, 5 p.m. ET | 5+5 years

The Army released draft solicitations for two multiple-award vehicles under **Human Resources Solutions GEN VI**: **RMAS** (Recruiting, Management and Administrative Support), a **$1.5 billion small-business set-aside**, and **PLS** (Personnel Life-Cycle Support), **$6.09 billion, full and open**. Both run a five-year base plus one five-year option. The incumbent contracts started in 2018.

- **Questions and comments on the draft RFPs are due 5:00 p.m. Eastern today, Monday, October 26.** Two amendments have issued; both repaired broken attachment links and neither moved the date.
- **No award count has been published.** The Army has indicated it intends to award to all offerors submitting acceptable and qualifying proposals — which is not the same as a number, and nobody should price a bid against an assumed one.
- This is a **feedback** deadline, not a proposal deadline. It is also the last cheap moment to influence the small-business / full-and-open split and the performance work statement.

Verified against three independent accounts; no extension found as of the notice's October 20 update. SAM.gov refuses automated retrieval from this environment, so a human should confirm no further amendment landed over the weekend before relying on the hour.

SO WHAT

A $6.09 billion full-and-open services ceiling on a ten-year runway is an annuity, and the requirements that decide who can win it are being written this week, not next quarter. If your capture team has not read both drafts, the cost of missing today is that you spend 2027 bidding someone else's requirements.

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03 In force CYBER SUPPLY CHAIN AI

DHS ordered DeepSeek out of civilian federal IT — and the order reaches anything "developed

using DeepSeek implementations"

91 FR 66346 | FR Doc. 2026-21447 | Docket DHS-2026-0628 | Published Oct 20, 2026 | 3 business days

DHS published a **Notice of Order** — not a rule — excluding and removing DeepSeek products from Federal Civilian Executive Branch IT systems and procurements. Published **October 20, 2026** at **91 FR 66346–66350**, Document No. **2026-21447**, Docket **DHS-2026-0628**, issued under the Federal Acquisition Supply Chain Security Act (41 U.S.C. 1321–1328; 41 CFR 201-1) on a Federal Acquisition Security Council recommendation.

- **The scope is the story.** It covers Hangzhou DeepSeek Artificial Intelligence Co., Ltd and its affiliates (affiliate per 48 CFR 2.101) — **plus third-party products and services "developed using DeepSeek implementations."** The notice does not define that phrase. Read plainly it reaches distilled and fine-tuned open-weight derivatives, which means the exposure lives in your software bill of materials.
- **Your duties run through FAR 52.204-30**, the standing FASCSA clause, not through the notice itself: review SAM.gov for FASCSA orders **at least once every three months**, report a covered article to the contracting officer **within 3 business days** of identification, and flow the prohibition down.
- **An order binds an existing contract only once the CO adds it by modification.** Expect a wave of mods, and expect some of them to arrive without warning.

The Federal Register document states no removal deadline and no exception window — the signed order is reproduced as a scanned image appendix that does not yield extractable text. Trade reporting describes a 60-day **exception-request** window to CISA running from a July 24, 2026 signing, which would have closed **September 22 — 28 days before the order was published**. That sequence is not verifiable from the Federal Register text, and we are not printing it as fact. The full order should be on regulations.gov under DHS-2026-0628.

SO WHAT

If you ship any AI-bearing product into a civilian agency, the question is no longer "do we resell DeepSeek" — it is whether you can produce model provenance for every component in a delivered stack, within three business days, when a CO asks. Most primes cannot today. Building that evidence is a quarter of work; being asked for it is a phone call.

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04 Live SMALL BUSINESS COMPLIANCE

SBA referred 689 former 8(a) firms to GSA for contract audits, covering $5.5 billion in ceiling

689 firms | $5.5B ceiling | Oct 21, 2026 | 8(a) base down 18%+ | >$13B flagged since Aug

On **October 21, 2026**, SBA referred **689** firms suspended or removed from the 8(a) Business Development Program to GSA for contract audits. Those firms held set-aside awards with a combined **ceiling** of **$5.5 billion** — ceiling, note, not obligations. SBA Administrator Kelly Loeffler described a 21-month review; GSA Administrator Edward C. Forst said GSA has identified more than **$13 billion** in potential fraud since August, including **$1.2 billion** at HHS.

- **The sequence matters.** More than 1,000 firms were suspended in January 2026; termination proceedings were begun in February against **154 Washington, D.C.-based** firms (proposed, not completed, and geographically limited); 628 were removed in March. The 8(a) population has contracted by **more than 18%**.
- GSA will examine past contracts for improperly issued awards, inaccurate statements and **pass-through arrangements**. Suspected fraud routes to the OIG and DOJ.
- **No completion deadline for the audits has been published.**

SO WHAT

Two exposures, and most firms are only tracking the first. If you were a teammate, JV partner, mentor or subcontractor to any of the 689, your past-performance file and your invoices are inside the audit perimeter — pass-through review looks at the prime relationship from both ends. Second: an 18% contraction in the 8(a) base, running alongside the size-standard rewrite that closes November 20, is restructuring who can hold set-aside work for the next decade. There is near-term capture upside in re-competed work and near-term termination-for-convenience risk sitting in teaming agreements you signed last year. Go read them.

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05 Days AI CLOUD

The OneGov AI price cliff arrives: $1 Claude ends this month, $0.47 Gemini next

GSA page updated Oct 21 | Anthropic $1 → ends Oct 2026 | Google $0.47 → ends Nov 2026 | 24+ OneGov deals

GSA's Buy AI page, last updated **October 21, 2026**, lists **Anthropic Claude Enterprise at $1** with the offer ending **October 2026** and **Google Gemini for Government at $0.47** ending **November 2026**. Every end date on GSA's own page is month-only. Trade reporting is more specific and does not match it: FedScoop gives October 31 for Anthropic, Nextgov gives November 15 for Google. Treat them as end-of-October and mid-November and confirm before you build a plan on a day.

- **Agencies that onboarded at $1 are about to see real pricing**, in some cases within days. HHS has already posted a notice for an interim **sole-source** "limited continuity of services" award to Anthropic, pending a competitive **HHS Enterprise Frontier SI Models and Advanced Features** multiple-award BPA. No dollar value was published, and FedScoop has raised questions about the acquisition authority used.
- **A new lane opened for small business.** On October 23 GSA announced its first direct-to-government OneGov deal with a small business — **(US)AI** of North Bethesda, Maryland, an 8(a) firm whose Intelligent Computing Platform holds FedRAMP High. Terms: up to **30%** off software licenses, **$1** two-week proof-of-value pilots, expiring **September 30, 2028**. No contract value published, and no source gives a signing date.
- GSA has signed more than two dozen OneGov software deals since mid-2026, claiming roughly **$1.6 billion** in cumulative savings.

SO WHAT

A price cliff is a displacement window. Agencies that adopted a model at a dollar now have to justify a real line item, and the ones that cannot will re-compete or consolidate — which is services work in migration, governance, evaluation and re-procurement support, available right now and gone by Q2. The (US)AI deal is the other signal: GSA will cut direct OneGov terms with an 8(a) holding FedRAMP High. If that describes you, the door is demonstrably open.

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06 Dec 7 QUANTUM INVESTMENT

Treasury proposed rules this morning that make quantum a prohibited sector outright — no notification path exists

91 FR 67396 | RIN 1505-AC94 | FR Doc. 2026-21786 | Published TODAY | Comments Dec 7

Treasury's Office of Investment Security published a **proposed rule** on the Outbound Investment Security Program **today, October 26, 2026 — 91 FR 67396–67433**, FR Doc. **2026-21786**, RIN **1505-AC94**, Docket **TREAS-DO-2026-0595**, amending 31 CFR parts 850 and 851. **Comments close December 7, 2026.** Quantum is treated as **prohibited**, not notifiable: Treasury states it would not include any quantum information technologies within the definition of a notifiable technology, so there is no filing path — a covered transaction is simply barred.

- **Prohibited:** developing a quantum computer or producing critical components — the rule names **dilution refrigerators** and **two-stage pulse tube cryocoolers** as examples — and developing software to design, simulate, test or control one, or to optimize its algorithms.

- **Quantum sensing** is prohibited where intended for military, intelligence or mass-surveillance end use. **Quantum networking and communications is not limited that way**: networking to scale up quantum computers, and secure communications such as QKD, are prohibited on their own terms, with the end-use test attaching only to a residual third category.
- Treasury states it has **not** proposed technical parameters under which a quantum transaction could be permitted, though the statute directs the Secretary to define them.

SO WHAT

If you have a quantum line of business, a cryogenics or control-electronics supply chain, or a corporate venture arm that has touched the sector, you have six weeks to read a 38-page proposal that forecloses rather than conditions. "Prohibited" means there is no filing you can make to proceed — which also means the comment window is the only lever, and a comment filed before December 7 is worth more than counsel's time afterward. It reshapes the teaming pool for DARPA QBI and CHIPS-funded quantum work too.

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07 In force AI DEFENSE

A Pentagon memo now requires vendors to document their models' "ideological neutrality"

Memo dated Oct 20, 2026 | John M. Tenaglia, DPCAP | OMB M-26-04 | 3 templates | No deadline published

A memo from **John M. Tenaglia**, Principal Director for Defense Pricing, Contracting, and Acquisition Policy, dated **October 20, 2026**, issued department-wide guidance on acquiring large language models. It went to acquisition leaders at the Army, Navy, Air Force, SOCOM, CYBERCOM, TRANSCOM and the defense agencies. It implements **two** instruments: the 2025 executive order on preventing ideologically biased AI in federal government, and **OMB memo M-26-04**, "Increasing Public Trust in Artificial Intelligence Through Unbiased AI Principles." Tenaglia stated compliance is mandatory.

- Three attachments: a template memo for selecting transparency requirements, standardized solicitation language telling vendors what compliance documentation to submit, and contract language for the SOW or PWS.
- **The amount of information available varies with the vendor's position in the software supply chain** — more is generally available closer to the original model developer. Resellers and integrators are the ones who will struggle to produce it.
- **No dollar threshold, effective date or compliance deadline was published.** We checked the DPCAP announcements page; the memo is not posted there, and no source states one. Anyone quoting you a deadline on this is inventing it.

Single-sourced to DefenseScoop (October 23). The memo's primary text is not publicly posted and we found no independent reporting; the surrounding policy — the executive order, OMB M-26-04, the parallel GSA clause — is well corroborated, but the memo itself is not. Note also that "Department of War" is a secondary designation created by executive order in September 2025 and adopted as branding; the legal name remains the Department of Defense, because the statutory rename passed the House in the FY2027 NDAA on July 22, 2026 but that bill is not enacted.

SO WHAT

Model provenance and behavior documentation has become a scored, formal part of DoD proposals, and it is the integrators who are exposed: you cannot attest to the training and alignment characteristics of a model you license and do not build. The fix is contractual and it is slow — upstream documentation rights in your OEM agreements — so start it before the next DoD AI solicitation drops, not during the proposal.

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08 ~Dec 19 QUANTUM CYBER ACQUISITION

A FAR proposed rule forcing FIPS and post-quantum compliance on "covered contractors" is due within 180 days of June 22

EO 14412 | 91 FR 38483 | Sec. 6(c), 180 days | Compliance by Dec 31, 2030 | CNSSP-15 from 2027

Executive Order 14412, "Securing the Nation Against Advanced Cryptographic Attacks," signed **June 22, 2026** and published at **91 FR 38483–38486**, sets four milestones landing within 180 days of signing — **roughly December 19, 2026**. The EO states day-

counts, not dates, so treat the calendar date as arithmetic rather than printed law.

- **Sec. 6(c):** the FAR Council must publish a **proposed rule** requiring covered contractors to comply with NIST FIPS, including post-quantum-compliant ones. Contractor compliance date in the EO: **December 31, 2030**.
- **Sec. 6(b):** Commerce and NIST must revise **Cryptographic Module Validation Program** processes to accelerate validations — an admission that the CMVP queue is already the bottleneck.
- **Sec. 4(b):** agency high-value assets migrate key establishment by **December 31, 2030** and digital signatures by **December 31, 2031**.
- **At ~270 days (around March 19, 2027):** CISA with NIST publishes minimum elements for a **cryptographic bill of materials**, and the FAR Council proposes a second rule on contractor vulnerability disclosure programs covering cryptographic vulnerabilities.
- **NSA, October 1, 2026:** under CNSS Policy 15, starting in **2027** all new commercial national security systems must be capable of supporting quantum-resistant algorithms, and legacy systems that cannot are phased out by **2030**.

SO WHAT

The revenue consequence is the CMVP queue. A FIPS flow-down to "covered contractors" turns a validated cryptographic module into a bid prerequisite across civilian and defense work, and validation lead times are measured in quarters — which is precisely why the EO orders them shortened. If you sell anything that performs key establishment or signing, find out today where your modules sit in that queue. The 2030 compliance date is not the deadline that will hurt; the 2027 NSS capability requirement and the proposed rule in December are.

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09 Frozen CYBER DEFENSE

CMMC is still suspended, the reform report is six weeks overdue, and the enforcement risk did not pause with it

`Phase 2 suspended Jul 13, 2026` `Was to start Nov 10, 2026` `Review closed Sep 11` `No restart date` `$2,042,518 FCA settlement`

This item is here because nothing happened. The department suspended **CMMC Phase 2 on July 13, 2026**; Phase 2 had been set to begin **November 10, 2026** — a date that now passes in a fortnight with nothing behind it. **Class Deviation 2026-O0025 Revision 3**, signed September 3, 2026, codified the suspension into contract text. The 60-day reform review **closed September 11**. As of today the CMMC Reform Task Force report **has not been released**, and **no new Phase 2 start date exists**.

- **What you still owe, pause or no pause:** DFARS **252.204-7012** safeguarding, which keeps its clause number, and Level 1 and Level 2 self-assessments against **NIST SP 800-171 Revision 2**.
- **A renumbering worth knowing.** DFARS 252.204-7020 became **252.240-7997** effective February 1, 2026 — under the Revolutionary FAR Overhaul Part 240 deviation, **not** under the CMMC suspension. And it was more than renumbering: the Basic self-assessment requirement was removed, leaving government-performed Medium and High assessments, and 252.204-7019 was eliminated.
- Contracting officers are to strip C3PAO Level 2 and Level 3 requirements from active solicitations "as soon as practicable" and from existing contracts before the next option exercise.

`The detailed clause-level mechanics of Revision 3 come from law-firm analysis; the deviation memo itself could not be retrieved from this environment.`

SO WHAT

Read the pause as timing risk, not relief. DOJ's Civil Cyber-Fraud Initiative is unaffected and accelerating — Honeywell Aerospace settled for **$2,042,518** on September 1, 2026 over NIST SP 800-171 shortfalls on a single network. A false SPRS score is still a False Claims Act exposure with the certification requirement suspended. The correct budget treatment of C3PAO readiness is **deferred**, not cancelled, and the report could land in any week — including one where you have a proposal due.

10 Decided PROTEST VEHICLES

A court blessed killing a $10 billion awarded vehicle, and told 23 protesters to eat their bid costs

Westwind Partners v. US | Nos. 24-1504C et al. | Fed. Cl., Oct 13, 2026 | $10B, 15 awardees | B&P costs denied

The U.S. Court of Federal Claims held that DHS had a rational basis to cancel **FirstSource III**, its **$10 billion** IT hardware vehicle. Judge Edward H. Meyers decided **Westwind Partners, LLP, et al. v. United States**, Nos. **24-1504C et al.** — 30 consolidated dockets — on **October 13, 2026**. Fifteen companies had won awards in a single round in September 2024. After DHS cancelled in mid-2025, **23 remaining protesters** amended to seek only **bid-and-proposal cost reimbursement**. The court **denied** it.

- DHS justified the cancellation under **Executive Order 14240** (March 2025, consolidation of common goods and services through GSA), finding **14 of the 15** awardees reachable via NASA SEWP or GSA Schedules and the fifteenth through joint ventures.
- The court found the record did not support the contention that cancellation was timed to defeat an imminent protest win, and that the agency could rely on current market conditions rather than six-year-old market research.
- GAO had previously agreed DHS overstated its cost-avoidance claim. The court did not need to reach it.

Caption, docket numbers, judge and decision date confirmed through the court's docket and a practitioner index of COFC bid-protest decisions; the October 13 slip opinion itself could not be retrieved from this environment.

SO WHAT

This is the cleanest precedent yet that a consolidation-driven cancellation survives judicial review **and** that losing bidders absorb their own B&P costs. Agencies now have a tested playbook for killing an awarded agency-specific vehicle and pushing the demand onto SEWP or Schedules. Price that risk into every agency-unique IDIQ you are chasing — and note where the displaced demand goes, which matters a great deal in a quarter when SEWP V closes January 31 and SEWP VI opens November 1.

DATED ACTIONS

Every deadline above, in order. Red binds or lapses.

DATE	WHAT HAPPENS	ITEM
Oct 26	Army HR Solutions GEN VI draft RFP comments close, 5 p.m. ET	02
Oct 26	Next Gen IAC MAC industry-day RSVPs close	chg
Oct 29	ICE ORBIT industry day (SWIFT recompete); registration closed Oct 22	—
Oct 31	Anthropic OneGov $1 offer ends, per trade reporting; GSA's page says only "Oct 2026"	05
Nov 1	NASA SEWP VI opens	—
Nov 4	VA MOSAIC sources-sought responses due, 3 p.m. ET, 25-page cap	—
Nov 5	SOCOM common-PaaS draft PWS / RFI responses due	—
Nov 2026	GSA MAS Refresh 34 issues; 90-day mass-mod acceptance clock starts	01
Nov 19	FedRAMP RFC-0036 (20x Class D) comments close	chg
Nov 20	SBA size-standard rewrite comments close	04
Dec 4	NASA Goddard HBG II proposals due, 2 p.m. ET ($425M, small-business set-aside)	—
Dec 7	Treasury outbound-investment comments close; NIST SP 800-221 Rev. 1 ipd also closes	06
Dec 11	CR, TMF authorization and CISA 2015 all lapse	chg
~Dec 19	EO 14412 180-day milestones: FAR proposed rule on FIPS/PQC, CMVP process revision	08
Dec 31	NAWCAD Cyber Warfare Services final RFP projected (single award, $500M–$1B estimate)	—
Jan 1	DFARS 252.225-7052 expands to materials mined, refined or separated in covered countries	—
Jan 6	EO 13658 contractor minimum wage rises to $14.05/hr (tipped $9.85)	—
Jan 19	GAO decision expected on the DISA Defense Enclave Services expansion protest	—
Jan 31	NASA SEWP V closes	—

WHERE THIS IS UNCERTAIN

Flagged because acting on the wrong version is expensive.

Today's 5 p.m. deadline

Three independent accounts give October 26, 5 p.m. ET for the Army GEN VI draft comments, and no extension appears as of the notice's October 20 update. **SAM.gov refuses automated retrieval from this environment**, so we could not read the live notice this morning. Confirm before relying on the hour.

MAS Refresh 34's actual date

Wiley and PilieroMazza both state **November 6, 2026**. GSA's own Significant Changes attachment says only **"November 2026."** We are printing the disagreement rather than picking. The 90-day mass-mod clock runs from issuance, so the day matters.

The DeepSeek removal deadline

Not stated in any text we could extract from the Federal Register document — the signed order is a scanned image appendix. The 60-day figure circulating in trade coverage is an **exception-request** window, not a removal deadline, and appears to have closed before publication. We are not printing a removal date.

The Pentagon AI memo

Single-sourced to DefenseScoop. The Tenaglia memo is not posted on the DPCAP announcements page and we found no independent reporting of it. The policy around it is well corroborated; the memo is not.

A circulating wrong wage figure

Several law-firm updates give the new EO 13658 contractor minimum wage as **$14.08**. The Federal Register notice (91 FR 64403, FR Doc. 2026-20646) says **$14.05**, with a $9.85 tipped cash wage, effective January 6, 2027. Use $14.05.

Figures we declined to print

A **$6 billion** ceiling for CISA's Strategic Cyber Tools Buying appears only in a forecast database and conflicts with the one reachable primary-adjacent account; GSA STARS IV and DLA SOE TLS 6 likewise circulate as forecast estimates with no published dates. A reported **~$350 million** DoD quantum package from October 8 could not be verified against a primary source. None of these are in this brief.

The SWIFT number

The **$307 million** figure attached to ICE's SWIFT contract is **obligations to date**, not the ceiling, which was announced at roughly $340 million. The distinction matters when sizing the ORBIT recompete.

What this brief could not see

These refused automated retrieval this week: **gao.gov**, **cisa.gov**, **congress.gov**, **sam.gov**, **war.gov** and **breakingdefense.com**; **buy.gsa.gov** and **regulations.gov** serve only a JavaScript shell. **Bid protests are therefore systematically invisible to this brief** — the two protest items here are reached through trade coverage and a practitioner index, and no GAO B-number was confirmed for any of them. Because SAM.gov is closed to us, every solicitation date in this edition comes from trade reporting rather than the notice itself. Because congress.gov is closed, we print no bill or public-law numbers.

SOURCES

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7. FAR 52.204-30 — FASCSA Orders, Prohibition — https://www.acquisition.gov/far/52.204-30
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9. SBA — refers nearly 700 noncompliant 8(a) firms to GSA — https://legacy.sba.gov/article/2026/10/21/sba-refers-nearly-700-noncompliant-8a-firms-gsa-conduct-contract-audits
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11. Nextgov — (US)AI becomes GSA's first small-business OneGov deal — https://www.nextgov.com/acquisition/2026/10/usai-becomes-gsas-first-direct-onegov-contract-small-business/416789/
12. FedScoop — HHS sole-source award to Anthropic — https://fedscoop.com/hhs-sole-source-award-anthropic-ai-claude/
13. Federal Register — Outbound Investment Security Program (91 FR 67396) — https://www.federalregister.gov/documents/2026/10/26/2026-21786/outbound-investment-security-program-regulations
14. DefenseScoop — Pentagon guidance on AI procurement — https://defensescoop.com/2026/10/23/pentagon-guidance-ai-procurement-trump-directive/
15. Federal Register — EO 14412, Securing the Nation Against Advanced Cryptographic Attacks — https://www.federalregister.gov/documents/2026/06/25/2026-12909/securing-the-nation-against-advanced-cryptographic-attacks
16. NSA — post-quantum cryptography measures for national security systems — https://www.nsa.gov/Press-Room/Press-Releases-Statements/Press-Release-View/Article/4615285/
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