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The October Funnel

Six binding dates land in the next twenty-six days, and two of them are tomorrow. A $21.6B defense cloud solicitation and a $626M DHS cyber IDIQ both close at the start of business October 6. GSA's new large-language-model clause takes effect October 19, the same day comments close on sixteen rewritten FAR parts. Post-quantum migration plans are due to OMB October 22. The $1-per-user Claude agreement that put frontier AI on federal desktops expires October 31. None of this waits for December's appropriations fight.

Oct 6	Oct 19	Oct 22	Oct 31	Dec 11
TOMORROW	TWO GATES	OMB M-26-15	ONEGOV	P.L. 119-103
JWCC UCM Core proposals close at noon ET; DHS NCCS 2.0 Phase 1 closes the same day	GSA's LLM clause takes effect; FAR Overhaul batch-two comments close	Agency post-quantum cryptography migration plans due to OMB and ONCD	GSA's $1-per-user Claude agreement expires; no successor announced	The continuing resolution lapses with FY2027 still unappropriated

CHANGED SINCE NO. 1 (SEPTEMBER 28)

- **JWCC moved from “coming” to “closing.”** Last week's brief flagged the competition. The Unified Cloud Marketplace Core RFP, released in early September, closes **tomorrow at 12:00 p.m. Eastern** against a $21.6B ceiling.
- **NCCS 2.0 now has a number and a schedule.** DHS released the solicitation October 1: a $626M single-award IDIQ, Phase 1 proposals October 6, Phase 2 October 21, award targeted for late November.
- **The FAR Overhaul's second batch is live and short-fused.** Published September 18 across sixteen FAR parts, with comments closing October 19 — a 31-day window on rules that rewrite how competitive ranges and negotiations work.
- **The December 11 cliff is unchanged, but the ground under it moved.** On September 29 GAO found OMB unlawfully withheld nearly $1B past its September 30 expiration date (B-338788) — the twelfth Impoundment Control Act violation GAO has found since January 2025.
- **The Anthropic supply-chain matter resolved at the appellate level.** The D.C. Circuit decided September 25; the Department of War's deadline to terminate Anthropic-related activity was September 30. Last week's item stands; the follow-on is now a compliance exercise, not a litigation watch.
- **CMMC Phase 2 remains suspended** and nothing in this window changed that. The suspension was locked into a September 3 class deviation. Self-attestation to NIST SP 800-171 still binds.

01 Closes Oct 6, 12:00 ET CLOUD DEFENSE

JWCC's successor closes its first door tomorrow at noon, and the second one does not open until 2027

$21.6B ceiling | 5-year base + 5-year option | RFP released early Sept 2026 | Full and open to hyperscale CSPs

DISA's Joint Warfighter Cloud Capability Unified Cloud Marketplace Core solicitation, released in **early September**, closes **October 6 at 12:00 p.m. Eastern**. The RFP spans infrastructure-, platform- and software-as-a-service plus “anything-as-a-service,” against a ceiling of **$21.6 billion** over as much as ten years — a five-year base with a single five-year option.

- DISA has described Core as **full and open to U.S.-based hyperscale commercial cloud service providers**. The four incumbents on the 2022 JWCC — AWS, Google, Microsoft Azure and Oracle — are eligible, but **no expected award count has been published**.
- The companion solicitation, **JWCC Unified Cloud Marketplace Premier**, is anticipated in Q1 2027 with awards expected in Q3 2027.

- Premier carries the tiers that matter to everyone else: **Tier 2** for SaaS, PaaS and non-hyperscale infrastructure, and **Tier 3** reserved for commercial innovators and small businesses.

Three outlets give three release dates for the Core RFP — Nextgov and Washington Technology say September 5 (which fell on a Saturday), MeriTalk says September 8, GovConWire says September 9. We say early September rather than pick one. The closing date is not in dispute.

SO WHAT

If you are not a hyperscale cloud service provider, Core is not open to you and there is no reason to spend B&P on it. Your JWCC Next revenue lives in Premier, which means your capture investment belongs in **Q1 2027** — roughly a quarter from now — not this week. The practical move in October is positioning as a Tier 2 or Tier 3 partner to whichever providers take Core, because the teaming conversations that decide Premier will happen before the Premier RFP exists.

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02 Phase 1 Oct 6 · Phase 2 Oct 21 CYBER CLOUD DHS

DHS put $626M of network and cyber services into a single-award IDIQ on a seven-week clock

$626M ceiling | Single-award IDIQ | Solicitation released Oct 1, 2026 | Award target: late Nov 2026

DHS released the Network, Cloud and Cybersecurity Services 2.0 solicitation on **October 1**. It is a **$626 million single-award, department-wide IDIQ** consolidating cybersecurity, network operations and professional support across the DHS CIO's office and selected components. Phase 1 proposals are due **October 6**, Phase 2 on **October 21**, with award targeted for **late November**.

- The winner supports the **DHS Network Operations Security Center (NOSC)** — which DHS already operates and is continuing to evolve — across DHS OneNet at all classification levels, together with DHS headquarters and Management Directorate LANs.
- Scope includes incident response, threat detection and infrastructure resilience management.
- This sits alongside DHS's Cumulus cloud procurements, which have been awarding separately to hyperscalers rather than through a single integrator.

SO WHAT

A single-award IDIQ at this size is a binary outcome: one firm books a $626M pipeline and everyone else books nothing. The compressed Phase 1-to-Phase 2 interval — fifteen days — means the real decision was whether you had a team assembled before October 1, and the proposal is now an execution problem, not a strategy one. If you are not bidding, the pivot is subcontract positioning with the likely winners before award, because post-award teaming on a consolidated single-award vehicle is materially harder. Budget for a protest window in December either way.

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03 Effective Oct 19 AI ACQUISITION RULES

GSA's AI clause lands as a class deviation, and it lets the government switch your model off at will

RGO-2026-01 | Class deviation, not a rule | Signed by SPE Jeffrey Koses | 25% decommissioning cap

GSA issued its artificial-intelligence acquisition clause as a **class deviation** from the GSA Acquisition Regulation rather than through rulemaking. The memo, **RGO-2026-01**, was signed by Senior Procurement Executive Jeffrey Koses and is **effective October 19, 2026** — though contracting officers may use it immediately, and may modify existing contracts to add it at their discretion.

- Contractors may not use government data to train LLMs, inform advertising, or sell to a third party.
- Encrypted data transmission and audit logging are required; embeddings and fine-tuned weights must be deleted at contract closeout.
- **72-hour incident reporting**, and **30 days' notice** before major model updates with concurrent access to the prior version.
- The government retains the right to benchmark deployed models for bias and accuracy, and — in the issued version — to **suspend use at any time**, without the conditional “until issues are satisfactorily addressed” language that appeared in the June draft.

- Contractor liability for decommissioning costs after termination is **capped at 25%** of the affected task or delivery order.
- It does not apply where LLM use stays internal to the contractor's own operations, or where LLM functionality is incidental to the product's primary purpose.

We have not read RGO-2026-01 directly. FedScoop reports a seven-calendar-day notice requirement for material changes that increase output bias or degrade safety guardrails; Washington Technology reports a 120-day LLM functionality disclosure. Both trace to the same memo. Pull the memo from acquisition.gov before you write a compliance SOP against any specific clock.

SO WHAT

Two line items move. First, the suspend-at-will provision is an unpriced availability risk: if your delivery depends on an LLM the government can switch off without stating a trigger, your schedule and your fixed-price exposure both change, and that belongs in your risk register and your pricing. Second, the 25% decommissioning cap is favorable — it bounds a liability that was previously open-ended — so do not negotiate against it. Because this is a deviation rather than a rule, there was no notice-and-comment round to shape it and it can change again without one; write your compliance artifacts to be versioned.

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04 Comments close Oct 19 ACQUISITION RULES

Sixteen FAR parts are open for comment for two more weeks, and the competitive-range change is the one to read

Published Sept 18, 2026 | One rule in a ~16-part batch | Comments close Oct 19 | Batch one closed July 23

The FAR Council's second batch of Revolutionary FAR Overhaul proposed rules published **September 18** and comments close **October 19**. The batch spans roughly sixteen FAR parts across several rules; the one that reaches the most competitions covers **Parts 8, 12, 13, 15, 38, 44 and 51** plus associated Part 52 provisions and clauses (FAR Case 2026-003). The first batch, published June 23 across roughly twenty parts, closed for comment on July 23.

- **Competitive range.** Rather than requiring all of the most highly rated proposals, the range would include those “best suited for further negotiation.”
- **Negotiations.** Part 15 would let contracting officers negotiate with individual offerors without treating all of them uniformly — a move from structured “discussions” toward adaptive negotiation.
- **Deficiency.** Redefined from “material failure” to failure to conform to a material term, with price, quantity, quality and delivery named as examples.
- **Part 12** is restructured around presolicitation, solicitation/evaluation/award, and post-award administration, with heavier emphasis on commercial products and services.
- **LPTA** restrictions extend to munitions response services, implementing FY2025 NDAA § 822.
- **Parts 38 and 51 would be eliminated** rather than revised — 51 folded into Part 8, 38 deleted as duplicative.

SO WHAT

The competitive-range and asymmetric-negotiation changes together shift discretion toward the contracting officer and away from the protest file. “Best suited for further negotiation” is far harder to challenge than “most highly rated,” and uneven negotiation makes disparate-treatment arguments weaker. If your win strategy on large competitions has leaned on exclusion protests, the expected value of that lever drops. Comments are the last cheap moment to influence this; after October 19 your only input is litigation you are now less likely to win.

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05 DOW cutoff Sept 30 · OneGov expires Oct 31 AI SUPPLY CHAIN

One AI vendor is barred from Pentagon work and generally available to everyone else — in the

same week

`Decided Sept 25, 2026` `FASCSA, 41 U.S.C. § 4713` `Claude for Government GA Oct 1` `$1/user expires Oct 31`

On **September 25** the D.C. Circuit upheld the Department of War's determination that Anthropic poses a **supply chain risk** under the Federal Acquisition Supply Chain Security Act. The court read "supply chain risk" to reach risks arising from ordinary operations — model training, safety guardrails — without requiring hostile intent. DOW's deadline to terminate Anthropic-related activity was **September 30**. Six days after the ruling, on **October 1**, Anthropic moved Claude for Government to general availability in a FedRAMP High environment.

- The FASCSA order excludes Anthropic products and services from DOW contracts, and the prohibition attaches to work performed "as part of the performance of the contract."
- That phrasing puts the burden on you: you must determine whether the technology is embedded in deliverables or used by subcontractors supporting covered contracts, and be able to document the separation from unrelated commercial use.
- On the civilian side, Claude for Government moved to usage-based billing from per-seat, with administrator-set dollar caps by user tier and model.
- GSA's **$1-per-user** OneGov agreement was extended by one month and expires **October 31**. OpenAI's OneGov agreement runs to **December 31, 2028**; GSA has characterized the spread as broadening competition.

SO WHAT

If you hold both DOW and civilian work, you now need two AI toolchains and an auditable boundary between them, and the cost of that boundary is yours. Start with a written inventory of where the technology sits in your deliverables and your subcontractors' — that inventory is the artifact a FASCSA compliance review will ask for, and building it after a solicitation lands is the expensive version. The broader signal is more important than the single vendor: the D.C. Circuit has blessed an expansive reading of § 4713, so any frontier model in your stack is now a supply-chain item subject to exclusion on grounds that do not require anyone to have done anything wrong. Price AI dependencies as substitutable. On the civilian side, the October 31 expiry means any pilot economics you built on $1 per user should be re-forecast at usage-based rates before you commit to a delivery schedule.

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06 **CR lapses Dec 11** APPROPRIATIONS

GAO says OMB withheld nearly $1B unlawfully — the twelfth such finding — ten weeks before the money runs out again

`GAO B-338788, Sept 29` `~$1B withheld past expiration` `12th ICA violation since Jan 2025` `CR expires Dec 11, 2026`

FY2027 began October 1 on a stopgap. The continuing resolution holds agencies at FY2026 levels and expires **December 11, 2026**; it passed the House 370–48 and the Senate 90–6. On **September 29**, GAO issued decision **B-338788**, finding that OMB violated the Congressional Budget and Impoundment Control Act by withholding nearly **$1 billion** past its September 30 expiration date — by GAO's count the twelfth ICA violation since January 2025.

- The CR also blocks, through December 11, a proposed OMB rule that would have let political appointees terminate grants on political grounds.
- A stopgap at prior-year levels means no new starts and no production-rate increases without an anomaly — the familiar constraint, now running through the first ten weeks of the fiscal year.

SO WHAT

Two separate risks, and they compound. The CR constrains what can be awarded: if your FY2027 pipeline depends on a new program start, your realistic award date is January at the earliest, and your Q1 revenue forecast should say so. The impoundment finding is the one that is newly actionable — it says an appropriation, and a GAO decision enforcing one, is not a reliable guarantee that obligated money reaches you on schedule. Treat funded-but-unobligated backlog as a weaker asset than it looked a year ago, tighten your limitation-of-funds notices, and do not fund at-risk work against the assumption that appropriated money will arrive.

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07 Ordering opens Nov 1 VEHICLES CLOUD

SEWP VI goes live November 1 with fifteen times the awardees, and SEWP V has three months left

`$60B ceiling` `2,115 awards to ~1,490 vendors` `Ordering opens Nov 1, 2026` `SEWP V extended to Jan 31, 2027`

NASA's SEWP VI is awarded and ordering is anticipated to open **November 1, 2026**, running a ten-year period of performance to October 31, 2036 against a **$60 billion** ceiling. NASA made roughly **2,115 awards to about 1,490 vendors**, against SEWP V's roughly 197 awards to about 140 companies. NASA intends to extend SEWP V through **January 31, 2027**.

- **Category A — IT Solutions:** 364 awards for commercial ITC/AV products and product-based solutions.
- **Category B — Enterprise-wide IT Services:** 692 awards covering cloud, cybersecurity and managed services.
- **Category C — IT Mission-Based Services:** 1,059 awards for program-level and data-intensive mission support.
- The expansion from products into services is the structural change: SEWP is no longer primarily a reseller vehicle.

SO WHAT

Your SEWP position just got diluted by an order of magnitude. If you held a SEWP V slot, incumbency on the vehicle is no longer a differentiator — roughly 1,490 firms have one — and your pipeline model needs to stop treating vehicle access as a win rate input. The three-month overlap is the operational risk: task orders placed under SEWP V after November 1 have a hard backstop of January 31, 2027, so check the period of performance on anything in flight and re-compete it under SEWP VI early rather than discovering the gap in January. The services categories are where the margin is, and that is where 1,751 of the 2,115 awards sit, so the competition there will be severe from day one.

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08 Plans due Oct 22 QUANTUM CYBER

Every agency owes OMB a post-quantum migration plan in seventeen days

`OMB M-26-15, June 24, 2026` `Plans due Oct 22, 2026` `Five phases through 2035` `TLS 1.3 by Jan 2, 2030`

OMB memorandum **M-26-15**, issued **June 24, 2026**, requires agencies to submit post-quantum cryptography migration plans to OMB and the Office of the National Cyber Director within 120 days — **October 22, 2026**. It lays out five phases: strategy, discovery and inventory in 2026–2027; pilots and early migration in 2027–2028; key establishment for high-value and high-impact systems in 2028–2030; digital signatures in 2031; and the remainder by 2035, on a risk basis.

- A related 60-day milestone had GSA establish an interagency working group on Federal Identity, Credential and Access Management modernization by August 23, 2026.
- Agencies must support TLS 1.3 or a successor by **January 2, 2030**.
- The near-term deliverable is an inventory, not a migration — which is precisely the part agencies cannot do without their vendors.

SO WHAT

Seventeen days is not enough time for an agency to inventory its own cryptography, which means the inventory requests are landing on you now, in October, as unfunded data calls against contracts that never scoped them. Two responses worth separating: answer the data call to stay useful, and simultaneously log it as a change in scope if the effort is material, because this is a five-phase program and the 2027–2028 pilot phase is where the funded work appears. Firms that can produce a credible cryptographic bill of materials for their own products this quarter will be positioned for that phase; firms that cannot will be answering the same questionnaire in 2028.

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09 Disclosed Sept 29 CYBER DEFENSE

Unencrypted PII on a Pentagon file server was reachable for nine months before anyone noticed

`2.76M living, 294K deceased` `Accessible Oct 2025 – Jul 2026` `Discovered Jul 16, 2026` `Notifications Sept 18`

The Defense Manpower Data Center disclosed a breach of a file-sharing server holding **unencrypted** personally identifiable information. It affects about **2.76 million living individuals and 294,000 deceased**. A security vulnerability let unauthorized users reach files between **October 2025 and mid-July 2026**; DMDC discovered it on **July 16, 2026**, patched and restored the system, and sent notification letters on **September 18**. Exposed fields include Social Security numbers, names, dates of birth, contact details, demographic information and military occupational specialties.

- DMDC reports no current indication of misuse, and no group has claimed responsibility.
- Nine months of undetected access to a known-sensitive data store is a detection failure, not only a vulnerability.

SO WHAT

No contractor has been named, so the direct exposure here is low — but the second-order effect is predictable and worth getting ahead of. A breach of this profile, with unencrypted PII at the center of it, is what generates encryption-at-rest and detection requirements in the next round of DFARS and solicitation language, and it hands momentum back to the people who thought suspending CMMC Phase 2 was premature. If you hold DoD personnel, health or benefits data, assume your next contract action brings tighter requirements on encryption at rest and on time-to-detect. Auditing where you hold unencrypted PII today is cheaper than being asked to certify it later.

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10 Signed Sept 29 AI MODERNIZATION

The administration renamed AI and shipped a chatbot over 29,000 websites in the same week

`EO signed Sept 29, 2026` `America.gov launched Sept 29` `~29,000 sites consolidated` `Definition proposal due Nov 28`

On **September 29** the President signed an executive order directing departments and agencies to use **“Super Intelligence” (SI)** in place of “artificial intelligence” across official correspondence, communications and policy documents, and tasking the Assistant to the President for Science and Technology with proposing a federal definition of the term **within 60 days — by November 28, 2026**, including whether it should modify or supersede the existing statutory AI definition at 15 U.S.C. § 9401(3). No deadline is set for agencies to complete the terminology conversion itself. The same day, the administration launched **America.gov**, an AI-powered portal consolidating information from roughly **29,000 government websites**, built with Google's Gemini and xAI's Grok and integrated with Login.gov.

- America.gov currently directs users to services; completing transactions on the platform is planned for **2027**.
- GSA, CMS and the State Department were among the agencies represented at launch.
- The EO's fact sheet references $5 billion for the Genesis Mission without tying that figure to this order.

`The terminology directive generates real compliance cost without generating a deliverable. The one hard date is the November 28 definition proposal; no agency has published implementing guidance, and the federal definition of “SI” does not yet exist.`

SO WHAT

Budget a small, real number for the rename. Proposal boilerplate, SOPs, data-sheet language, capability statements and compliance matrices all say “artificial intelligence,” and agencies that adopt the EO language will expect yours to match — that is a documentation sweep across your whole library, best done once rather than per-proposal. The larger opportunity is America.gov's 2027 transaction phase: a portal that completes transactions across 29,000 sites needs identity, integration and legacy-system work that neither Gemini nor Grok provides, and that scope will be defined over the next two quarters. Where you have a modernization practice, the time to be in those conversations is before the requirement is written.

DATED ACTIONS

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

DATE	WHAT HAPPENS	ITEM
Oct 6	JWCC Unified Cloud Marketplace Core proposals close, 12:00 p.m. ET	01
Oct 6	DHS NCCS 2.0 Phase 1 proposals close	02
Oct 19	GSA LLM acquisition clause RGO-2026-01 takes effect	03
Oct 19	FAR Overhaul batch-two comments close (Parts 8, 12, 13, 15, 38, 44, 51)	04
Oct 21	DHS NCCS 2.0 Phase 2 proposals close	02
Oct 22	Agency post-quantum migration plans due to OMB and ONCD	08
Oct 31	GSA's $1-per-user Claude OneGov agreement expires	05
Nov 1	SEWP VI ordering opens; ten-year period of performance begins	07
Late Nov	DHS targets NCCS 2.0 award	02
Nov 28	EO 60-day mark: proposed federal definition of “Super Intelligence” due	10
Dec 7	CISA BOD 26-04: 180-day mark for agencies to begin operating risk-tiered remediation (3 days for actively exploited, automatable, internet-facing flaws)	cyber
Dec 11	Continuing resolution lapses; FY2027 appropriations unfinished	06
Dec 31, 2028	OpenAI OneGov agreement runs through this date	05
Jan 15, 2027	OMB Strategic Acquisition Guidance testing and reporting window closes	04
Jan 31, 2027	SEWP V extension ends	07
Q1 2027	JWCC UCM Premier solicitation anticipated (Tier 2 and Tier 3)	01

WHERE THIS IS UNCERTAIN

Flagged because acting on the wrong version is expensive.

What this brief could not see

Six sources refuse automated retrieval from the environment this brief is assembled in: **gao.gov** (rate-limited), **cisa.gov** (403), **congress.gov** (robots), **sam.gov**, **war.gov** and **breakingdefense.com**. The consequence worth naming: **bid protests are systematically invisible here.** GAO's protest docket and decisions are the primary record, and we cannot read it. Where a GAO or CISA document is cited above, it is cited through secondary coverage — Federal News Network for B-338788, Cybersecurity Dive for BOD 26-04 — not from the source. If a protest was filed, sustained or dismissed on anything in this brief, we did not see it. Verify against GAO's docket directly before you act on a schedule.

The exact clocks in GSA's AI clause

Reporting on RGO-2026-01 is not consistent. FedScoop describes a seven-calendar-day notice for material changes that increase output bias or degrade safety guardrails; Washington Technology describes a 120-day functionality disclosure and 72-hour incident reporting. These are probably separate obligations in the same memo rather than a contradiction, but we have not read the memo. Do not write an SOP against any one of these numbers without pulling the document from acquisition.gov.

The three-day tier in BOD 26-04

Secondary coverage disagrees on the threshold. Cybersecurity Dive and BleepingComputer describe the three-day tier as covering actively exploited, automatable vulnerabilities on internet-facing systems granting **partial or total** control; Wiley and the Cloud Security Alliance describe it as **total** control only. Because cisa.gov refuses automated retrieval, we could not read Table 1 of the directive itself. If you are sizing a patch SLA against this, read the directive text.

Where CMMC Phase 2 actually lands

The suspension is locked into a class deviation dated September 3, 2026, which makes reversal more involved than a policy announcement would be. The CMMC Reform Task Force's 60-day review period ended September 11; findings have not published and the timing rests with the DoD CIO. Self-attestation to NIST SP 800-171 remains mandatory throughout, and false attestations remain actionable. Plan for the controls, not the certificate.

Whether the October awards hold their dates

DHS targets late November for a $626M single-award IDIQ it solicited on October 1. JWCC Core closes October 6 against a $21.6B ceiling with four expected awards. Both schedules are aggressive, both are the kind that slip, and both are protest-likely. The dates above are the government's stated intent, not a forecast — and because we cannot read GAO's docket, we would not know early if a protest had already changed one.

What an undefined term costs

The September 29 executive order directs agencies to say “Super Intelligence” instead of “artificial intelligence” but does not define it — the definition is itself the assigned deliverable, with no due date. Until implementing guidance appears, there is no way to know whether this reaches solicitation language and evaluation criteria or stops at correspondence. Watch the first solicitation that uses the term; that will tell you more than the EO does.

Items we dropped

Two candidates did not survive verification and are not in the ten above. A widely circulated roundup described the September 29 SBA action as a **proposed rule** adjusting 8(a) eligibility and replacing race-based presumptions with individualized evidence standards. The Federal Register document is a **final rule**, effective on publication, amending 13 CFR Part 112 — Title VI nondiscrimination provisions — and it makes no change to 8(a), HUBZone, WOSB or SDVOSB eligibility. Separately, the VA OIG's finding that 435 contract actions worth $1.1B were terminated — against a $120.9B figure reported to Congress that contained significant errors — is real and material, but dated September 24, outside this window, with no deadline in the next ninety days.

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