Response to NASA OIG Report IG-24-002 pursuant to the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Public Law 117-263, Section 5274

Section 5274 of Public Law 117-263, the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 requires Offices of Inspector General (OIG) to notify all non-governmental organizations or business entities that are specifically mentioned in an OIG report. Section 5274 further requires the OIG to attach any response received from a non-governmental organization or business entity to the report in which they are mentioned. Therefore, in accordance with Section 5274, attached is a response provided to National Aeronautics and Space Administration Office of Inspector General (NASA OIG) regarding the report on *NASA's Commercial Lunar Payload Services Initiative,* report number IG-24-013, issued June 5, 2024.

This response represents the views of Draper. The NASA OIG did not evaluate this response and offers no comment and makes no representations, expressed or implied, of any nature with respect to the matters stated therein.

DRAPER®

555 Technology Square
Cambridge, MA 02139-3563

jmacdonough@draper.com
617 258 1000 | draper.com

3 July 2024

NASA Inspector General
P.O. Box 23089
L'Enfant Plaza Station
Washington, D.C. 20026

Dear Sir/Ma'am,

Thank you for including Draper in the distribution of the Inspector General's Audit of the Commercial Lunar Payload Services (CLPS) Initiative. As NASA's original partner for guidance, navigation, and control for the Apollo program's Moon landings, it is an honor and privilege to participate in NASA's return to the Moon under the CLPS Initiative. Draper stands ready to assist the CLPS office in carrying out the Inspector General's recommendations from our unique position in the market as a trusted NASA partner. To accomplish this mission, we are teaming with innovative small businesses to deliver mission success, with the technical rigor to which NASA is accustomed, at a commercial price.

Draper would like offer corrections regarding elements of the Inspector General's Audit. Draper teamed with ispace, inc. to provide a smaller lander to deliver a subset of the Task Order #2 payloads but was not selected to do so. For CP-12, Draper has subcontracted the design of a larger lander to ispace technologies, US. The 12-month delay (referenced on Page 20 of the report) occurred, in part, when Team Draper redesigned the larger, CP-12 lander to increase structural margins to meet emerging payload requirements, specifically to account for the sensitivity of the Farside Seismic Suite to loads during launch. Team Draper is planning to conduct a Critical Design Review in September 2024 and is working with NASA to agree on a re-baselined launch date in 2026. In addition, we believe there is a typo in Table 2 (page 13), our Initial and Current Task Order Amounts, inclusive of options, is $76M rather than $77M.

Draper is excited to continue supporting the CLPS office as NASA increases the size and scope of the program under future CLPS initiatives. We look forward to the opportunity to expand our unique role as a lean prime delivering fully successful lunar missions for NASA and commercial industry and laying the foundation for a robust lunar ecosystem. Any questions on this matter may be directed to Draper's Program Manager for the CLPS CP-12 Task Order, Mr. Michael LeFante, 617-352-0213, mlefante@draper.com.

Sincerely,

Julia MacDonough
Vice President/General Manager, Space Systems