

2. Plaintiffs argue that the amici are not neutral because they are advocating for a particular result and have a financial interest in the outcome of the case. If this alone were sufficient to disqualify an amicus, the courts would hardly ever accept an amicus brief. *See, e.g., The Onandaga Indian Nation v. New York*, No. 97-cv-445, 1997 U.S. Dist. LEXIS 9168, at *8-9 (N.D.N.Y. Dec. 24, 1997) (“[t]he fact that the [amicus] is not a completely neutral entity . . . is not a sufficient reason for denial of this motion”). In relying on the financial interest of the amici, plaintiffs only underscore the direct consequences for the amici of plaintiffs’ bold attempt to force the FAR Council to rewrite the Federal Acquisition Regulation (“FAR”) so as to cordon off *all* federal mapping contracts as the exclusive preserve of the licensed surveyor guild.

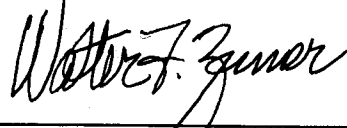
3. Although the Government has ably presented its case, the amici are uniquely positioned to advise the Court of the separate interests and perspective of the amici and their members, as well as the potential consequences to them of judicial action. Plaintiffs cannot deny these consequences, as that is precisely what they seek by this lawsuit.

CONCLUSION

Accordingly, to ensure that the Court has information concerning the interests of others with an important stake in the outcome of this case and that it has an appreciation of the potential consequences of judicial action on those others, including not only the amici but the GIS and computerized mapping industry as a whole, the amici request that the Court grant leave to file their amicus brief.

Dated: January 26, 2007

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of January, 2007, I have caused to be delivered, by electronic transmission and United States mail, true and complete copies of the foregoing *Reply of Amici Association of American Geographers, GIS Certification Institute, Geospatial Information & Technology Association, University Consortium for Geographic Information Science, and Urban and Regional Information Systems Association in Support of Their Motion for Leave to File Amicus Curiae Brief* on the following counsel:

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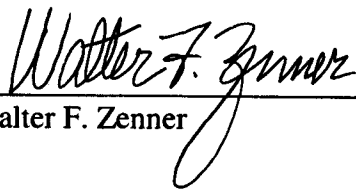
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