UNITED STATES MARINE CORPS
MARINE CORPS SYSTEMS COMMAND
2200 LESTER STREET
QUANTICO VIRGINIA 22134-5050

IN REPLY REFER TO:
4200
CT02/26172
6 April 2026

Portfolio Acquisition Executive Marine Corps (PAE MC)
Program Manager, Combat Support Systems
Product Manager, Combat Service Support Systems
2200 Lester Street
Quantico, VA 22134-5050

Subj: **USE OF OTHER THAN FULL AND OPEN COMPETITION FOR AN ACQUISITION UNDER THE SIMPLIFIED ACQUISITION THRESHOLD**

I. BACKGROUND:

1. FAR 13.106-1(b)(1)(i) states for purchases not exceeding the simplified acquisition threshold, Contracting Officers may solicit from one source if the Contracting Officer determines that the circumstances of the contract action deem only one source reasonably available (e.g., urgency, exclusive licensing agreements, brand-name or industrial mobilization).

2. As required by FAR 13.106-3(b)(3)(i), this memorandum explains the absence of competition for this acquisition, as only one source will be solicited for this requirement (or for a portion of the requirement) and the requirement is not expected to exceed the simplified acquisition threshold.

II. DESCRIPTION OF ITEM:

The United States Marine Corps (USMC) intends to procure specialized 75mm ski boots to support the Military Ski System (MSS) and enhance the mobility and operation effectiveness of Marines operating in extreme cold weather and mountainous terrain. Current Marine Corps (MC) Intense Cold Weather Boots (ICWBs) are not designed for use with the ski binding interface utilized by the MSS and do not provide the secure attachment necessary for safe and effective ski operations. This limitation negatively impacts mobility and performance in these challenging terrains where tasks can be arduous and physically taxing. The boot must provide thermal protection and rugged durability essential for sub-zero deployments, enhancing the mobility and operational effectiveness of Marines in snowy, mountainous, and arctic environments. The boot must be compatible with the Voile Switchback telemark binding system. Below are performance features, complete features are listed in the Statement of Work (SOW).

- Binding Compatibility: Shall feature a 75mm "duckbill" toe design.
- Operating Temperature: Shall enable the wearer to operate in conditions between 40° F and -25° F (Threshold); 40° F and -40° F (Objective).
- Shall weigh no more than 8 lbs. (size 10).

- Shall have a removable inner bootie for faster drying.
- The outer boot shall be more than 9 inches and no more than 11 inches.
- Shall be waterproof, or highly water resistant, to prevent melted snow and water from penetrating into the boot.

The proposed action will be a one-time definitive contract (purchase order) with Danner Inc.

Table 1 – Estimated Dollar Value

Appropriation	FY26
RDT&E	[redacted]

The list below identifies the line items and quantities:

Table 2 – CLIN Description and Estimated Dollar Value

CLIN Description	Total Quantity	Unit	Unit Price	Total Cost
Boots, Ski March (Double Ski March Boots, 75mm Toe	500	EA	[redacted]	[redacted]

III. THE DETERMINATION FOR USE OF OTHER THAN FULL AND OPEN COMPETITION IS BASED ON THE FOLLOWING (select all that apply):

A. _X__ ONLY ONE RESPONSIBLE SOURCE (select all that apply):

1. ___ RESTRICTIVE RIGHTS. The source has established proprietary rights, limited rights in data, patent rights, copyrights or secret processes in the item or service required.

2. ___ EXCLUSIVE LICENSING AGREEMENTS. The item or service is only available from the Original Equipment Manufacturer (OEM), or there is only one authorized distributor or technical representative for the OEM.

3. _X_ OTHER REASONS.

The requirement for a specialized 75mm ski boot supports product improvement under the Marine Corps' Cold Weather Clothing and Equipment Program (CWCEP) in accordance with Operational Requirements Document (ORD) 42.

The current ICWBs are not compatible with the existing MSS 75mm binding interface creating safety and operational risks. As a result, a dedicated ski boot compatible with the binding system

is required to ensure proper integration with the fielded MSS and to maintain operational safety and performance.

The purpose of this acquisition is to provide Marines with a dedicated ski boot designed specifically for integration with the MSS. This capability is distinct from the ICWB, which is designed primarily for general cold weather protection. This acquisition addresses a critical capability requirement by providing Marines with equipment specifically designed to improve mobility, safety, and operational effectiveness in cold weather and Arctic environments, while ensuring full compatibility with the fielded MSS. Below are mission impacts:

- Degraded Mobility and Maneuverability: Standard boots lack the specialized "duckbill" toe and heel welt needed for a secure connection with 75mm telemark bindings. This often results in boots slipping out of bindings, making it difficult for Marines to move or maneuver effectively in mountainous terrain.
- Reduced Operational Readiness and Fatigue: Non-specialized boots, such as those designed for static use, are often heavy and cumbersome for dynamic skiing. This increases physical fatigue, slows movement, and ultimately reduces the combat readiness of units operating in extreme cold weather and mountain warfare conditions.
- Safety Hazards in Steep Terrain: Without proper integration with the MSS and compatibility with essential gear like crampons, Marines face higher risks when navigating icy or steep ascents.

On 22 September 2025, (Contracting Office, Natick Division, Natick, MA) posted a Request for Information to SAM.gov to seek vendors capable of supporting the 75mm ski boot requirement. The program office received only one response, from Danner Boot Company, the only domestic vendor with the potential to develop a 75mm ski boot. Due to a lack of interest from other domestic vendors, this requirement is being pursued as a sole-source procurement.

To get more vendors interested in supporting the 75mm ski boot requirement, the team is actively educating industry partners on the need. While domestic vendors like Belleville, Rocky, and McRae have the technical capability to produce the boot, they have cited concerns regarding return on investment (ROI). While ROI is the primary driver, there are several deeper technical and structural reasons why domestic vendors like Belleville, Rocky, and McRae remain hesitant to support the 75mm ski boot requirement:

- For domestic vendors, investing in specialized molds and tooling for a 75mm sole which has almost no civilian market growth is a high-risk expense that is difficult to amortize.
- Many vendors find it more profitable to focus on standard combat boots that use readily available domestic materials
- The DoD's demand for specialized ski boots is relatively small compared to standard issue combat boots.
- Vendors are less likely to participate when they cannot sell a slightly modified version of the same boot to the civilian police, first responder, or outdoor enthusiast markets to recover their R&D costs

DISTRIBUTION: DOW COMMUNITY ONLY

To address this, the team continues to provide requirement briefs at key events including Joint Advanced Planning Brief for Industry (JAPBI), Modern Day Marine, and Team Industry Day and maintains consistent engagement through face-to-face meetings at [redacted].

Following the successful evaluation of fifteen (15) pairs of Danner 75mm ski boots under the Marine Corps Systems Command (MARCORSYSCOM) Bailment Agreement M67854-26-H-5403 dated January 6, 2026, with Danner, Inc. the program office plans to expand this effort by procuring 500 pairs in Fiscal Year (FY27) 2027.

Domestic Manufacturing Considerations

Market research conducted by Clothing and Equipment Team (C&E) identified Danner, Inc as the sole domestic manufacturer capable of producing a 75mm ski boot that meets the Marine Corps' technical and Berry Amendment (10 U.S.C. 2533a) compliance requirements, crucial for long-term sustainment. Unlike foreign alternatives, Danner, Inc as an established history of manufacturing military and tactical footwear and has previously supported U.S. military contracts, demonstrating the capability to meet Government performance requirements, quality standards, and delivery timelines. Danner's boots are widely recognized for their durability, traction, comfort, and performance in demanding operational environments, including cold-weather and rugged terrain applications. Choosing Danner ensures adherence to procurement regulation for future Operations and Maintenance (O&M) needs.

Under the Berry Amendment, the Department of War (DOW) is restricted from procuring certain textile and footwear items that are not produced domestically. DFARSPGI 225.7002-1 Restrictions paragraph (a)(1)(ii) Footwear listed in PSC 8430 or 8435.

Establishing a domestic source for this capability supports long term sustainment planning and ensures that future acquisitions of the 75mm ski boot can remain Berry Compliant. Danner is currently the only interested and viable domestic source with the capacity of fulfilling this requirement while meeting the Marine Corps' technical, operational, and future compliance requirements.

- Challenges faced by other domestic manufacturers: Market Research conducted through face to face meetings at Industry days, Modern Day Marines, and Joint Advanced Planning Brief for Industry (JAPBI determined other manufacturers were reportedly deterred by factors like uncertain return on investment, potential losses, and challenges with market uncertainty, time-to-market, and resource allocation, despite these challenges, Danner has expressed its willingness and commitment to meet the specified requirement.
- Compliance with the Berry Amendment: For potential future O&M purchases, the Berry Amendment, which restricts the DOW from procuring certain items not produced domestically, would apply. As the sole domestic source, Danner aligns with this requirement, ensuring compliance with future O&M needs.
- Simplified Acquisition Threshold (SAT) Considerations: While this purchase falls below the $150K SAT for Research and Development (R&D), which allows for the use of foreign suppliers, prioritizing a domestic manufacturer like Danner aligns with long-term O&M

needs and the Berry Amendment. While the SAT for general acquisitions is $350,000, for Berry Amendment-compliant purchases, the threshold reverts to $150,000. Current R&D purchases fall below the SAT for which foreign suppliers can be utilized, selecting Danner as the domestic source for 75mm ski boots strategically ensures future compliance with the Berry Amendment for anticipated O&M requirements.

B. ___ BRAND NAME. Item required must be a brand name product, or feature of a product, particular to one manufacturer. Discuss why you are precluding consideration of a product manufactured by another company.

C. _X_ UNUSUAL AND COMPELLING URGENCY. The supplies or services are of such unusual and compelling urgency that the Government would be seriously injured unless the agency is permitted to limit the number of sources from which it solicits bids or proposals. Urgent requirements are supplies or services that will result in a work stoppage or are mission critical and the routine processing time would result in injury to the Government. The determination that the procurement for the above item/service is an urgent and compelling requirement is based on the following:

1. Date on which the requirement was first identified: Fiscal Year 2022

2. Required delivery date/period of performance: November 2026– February 2027

3. Explanation of why delivery/commencement of services by the date mentioned above is required:

Timely delivery of the required 75mm ski boots between November 2026 and February 2027 is essential to support scheduled cold weather training and operational readiness. The procurement process must account for several key factors:

- Contracting Timeline: The contract award needs to be finalized well in advance to accommodate manufacturer lead times of 90 days and quality assurance testing.
- System Compatibility: The boots are essential for the MSS. Without the specific 75mm interface, the existing fleet of skis and bindings become non-functional for specialized mobility.
- Operational Risk: A delay directly translates to a loss of training days during the peak winter window. This degrades the Force's ability to maintain readiness in Arctic and mountainous environments.

Operational Impact

- Limited Mobility: Without ski boots designed to integrate with the MSS binding system, Marine lose critical over-snow mobility, limiting their ability to maneuver effectively in deep snow and mountainous terrain.
- Interrupted Training Cycles: Lack of specialized footwear will stall critical curricula at the Mountain Warfare Training Center (MWTC) and jeopardize high-profile cold weather exercises in Norway, resulting in a loss of perishable technical skills.

- Reduced Operational Readiness: Delays in fielding the required equipment would hinder the Marine Corps ability to prepare Marines for cold weather and Arctic operations, where mobility and endurance are critical to mission success. Without this equipment, the Marine Corps cannot guarantee the mission readiness of units tasked with operating in extreme winter climates.

Urgency and Modernization Considerations

- Alignment with Force Design: Procuring 75mm ski boots is a critical component of the 2025 Force Design Update, which prioritizes fielding new capabilities to ensure the Marine Corps remains a globally responsive naval expeditionary force.
- Arctic Strategy Execution: Providing Marines with equipment specifically designed for ski mobility enhances their ability to train, maneuver, and sustain operations in these demanding environments. This modernization directly supports the 2024 Department of Defense Arctic Strategy, which identifies the ability to "monitor and respond" in the High North as a vital national interest requiring specialized, reliable equipment.
- System Integrity: These boots are purpose-built to integrate with the MSS, transforming individual Marines into a high-speed, mobile force capable of over-snow maneuver where traditional vehicles cannot operate.

Production Lead Time

- The Production Lead Time for delivery and evaluation of the ski boot is between November 2026 and February 2027, however it is the intent to deliver the capability as quickly as possible to meet the cold weather training scheduled at MWTC and Norway.

4. If appropriate, include any additional pertinent information.

Justification for Sole Source Procurement

- Lack of domestic alternatives: Market Research conducted by the Government indicates Danner is the only known domestic manufacturer, willing and capable of producing a specialized 75mm ski boot that meets the Marine Corps' technical and operational requirements. No other domestic source currently offers a product that meets the Marine Corps' stringent Berry Amendment compliance and technical specifications.
- Danner's Technical Capabilities and Supportability: As the only proven domestic source, Danner ensures long term logistical support and consistent quality control, mitigating the risk of component failure in life-critical arctic environments.

Danner's Existing Government Contracts and Capabilities

- Experience with government contracts: Danner have supported U.S. military footwear requirements through government contracts, demonstrating an established capability to comply with federal procurement requirements, quality standards, and delivery schedules. This experience indicates that Danner possesses the necessary infrastructure and processes to support Government acquisitions.

- Danner boots are recognized for their durability, comfort, traction, and suitability for various conditions, including military and tactical use. These characteristics make the manufacturer well suited to support Marine Corps cold weather requirements.
- Danner offers both domestic made and imported footwear, and several of their products are Berry Amendment Complaint and hold certifications like US Army AR 670-1 Compliance. This further demonstrates the company's familiarity with military footwear specifications and performance expectations.

IV. Determination of Fair and Reasonable Cost.

The Contracting Officer, with the assistance of PM CSS, will ensure all supplies ordered under this contract are procured at a fair and reasonable cost in accordance with FAR 15.404-1. The Government Cost Estimate will also serve as a cost comparison point for negotiations with the vendor.

V. CERTIFICATIONS/APPROVALS:

A. Technical / Requirements Certification: I certify that the facts and representation under my cognizance which are included in this justification are complete and accurate to the best of my knowledge and belief.

[redacted] _____ Date

Team Lead, Clothing and Equipment
Product Manager, Combat Service Support Systems

B. Certification/ Approval.

[redacted] _____ Date

Product Manager Combat Service Support Equipment
PM Combat Support Systems

[redacted] _____ Date

Contracting Officer
PM Combat Support Systems