Justification & Approval
For Other than Full and Open Competition

As a legislative branch agency, the Library is subject to the competition and advertising requirements of 41 U.S.C. § 6101. Like the Competition in Contracting Act and the FAR, 41 U.S.C. § 6101 does not require competition when a contracting officer certifies that only one source or brand-name item is available, when dictated by public exigency, or when otherwise authorized by law.

This document sets forth the justification and approval for award of a contract or order by means providing for other than full and open competition per 41 U.S.C. § 6101, LCR 7-210, and, as applicable, FAR 6.302, FAR 13.106-1, FAR 8.405, and FAR 16.505. Contracting without competition shall not be justified on the basis of a lack of advance planning or concerns related to availability of funds.

This form shall be used to support instances where competition will be limited to a single source, a limited number of sources, including where a brand name product is required.

Part 1 – Identification

1. Contracting Agency and Activity: Library of Congress, LCSG, RCS, NAVCC, PSS

2. Nature of Action Being Approved

☒ Contract (or modification)
☐ LoC or Leg Branch Order (or modification)
☐ GSA Schedule or GWAC:
☐ Other:

Plan ID Number: 2026-LGR-0058
Contractor (or Brand Name): FET Electronics
Estimated Value (Base and all options): [redacted]
Period of Performance: 9/1/2026-8/31/2027 (Base)

3. Description of Supplies or Services Required to Meet Library Needs

The Library requires the following supplies or services: The Library of Congress (Library) requires contract support to provide maintenance and support for digital and analog audio playback/recording equipment installed in the Culpeper facility for the NAVCC Audio Lab. The vendor needs to have experience in the repair of obsolete audio reproduction equipment listed below:

- SONY PCM-R700/500
- SONY PCM-2500
- TASCAM DA45HR
- PANASONIC SV-3700/3800
- TASCAM DA88/98HR
- TASCAM DA38
- Alesis XT
- Alesis XT-20
- SONY PCM9000
- SONY CD-R2000
- SONY CDR-W66

Alesis LX-20
Alesis M-20
Alesis HD24
Alesis HD24
TASCAM CD-1000
HHB BurnIt
SONY PCM-F1
Tascam 112 MKII and MKIII
Tascam 122 MKII and MKIII
Studer A721
Nakamichi MR1 and MR2

Part 2 – Program Office Justification & Approval

4. Authority for Contracting Without Competition Over $350,000

For this requirement over $350,000, under FAR part 6, the basis for contracting without providing for full and open competition is:

☐ There is only one responsible source and no other supplies or services will satisfy Library requirements. 41 U.S.C. § 6101(b)(2)(C); FAR 6.302-1.
  ☐ Library's minimum needs can only be satisfied by contractor's unique capabilities or products. FAR 6.302-1(b)(1).
  ☐ Source controls copyrights, patents, raw materials, or secret processes cannot be acquired otherwise, or similar circumstances. FAR 6.302-1(b)(2).
  ☐ Other exception identified in FAR 6.302-1:

☐ There is such unusual & compelling urgency that the Government would be seriously injured if competition is not limited. 41 U.S.C. § 6101(b)(2)(B); FAR 6.302-2. Option years are not permitted.

☐ Source is expressly authorized or required by statute (e.g., AbilityOne, UNICOR, GPO, GSA Public Buildings Service, Appropriations Act, etc.) per 41 U.S.C. § 6101(b)(1) and FAR 6.302-5:

☐ Other basis authorized in 41 U.S.C. § 6101(b) or FAR part 6.302:
☐ Library's needs can only be satisfied by a brand-name product or item which is essential to the Government's requirement. FAR 6.302-1(c).
☐ The Product is listed on the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

Up to and including $350,000

For this requirement up to $350,000, using simplified acquisition procedures under FAR part 13, the basis for contracting without providing for full and open competition is:

☒ Only one responsible source is reasonably available to meet Library requirements. 41 U.S.C. § 6101(b); FAR 13.106-1.
- ☒ Product or service is reasonably available from only one source.
- ☐ Source controls copyrights, patents or other exclusive licensing arrangements.
- ☐ Urgent circumstances; only one source can reasonably deliver by required date. Option years are not permitted.
- ☐ Source is expressly authorized or required by statute:

☐ Library's needs can only be satisfied by a brand-name product
☐ The Product is listed the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

GSA Schedule Order

For this GSA schedule order under FAR part 8, the basis for not competing among GSA schedule-holders and/or specifying a brand name product or item is:

☐ An urgent and compelling need exists, and following GSA procedures would result in unacceptable delays. FAR 8.405-6(a)(1)(i)(A).
☐ Only one GSA source is capable of fulfilling the requirement at the level of quality required because the supplies or services are unique or highly specialized. FAR 8.405-6(a)(1)(i)(B).
☐ In the interest of economy and efficiency, the new work is a logical follow-on to an original order that was placed competitively among GSA schedule-holders (i.e., the original order was not sole-source or limited-source.) FAR 8.405-6(a)(1)(i)(C).
☐ Library's needs can only be satisfied by a brand-name product
☐ The Product is listed on the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

Order Under Multiple Award Indefinite-Delivery Contract or GWAC

For this order under FAR subpart 16.5, the basis for contracting without providing for full and open competition is:

☐ The need is so urgent fair opportunity would result in unacceptable delays. 41 U.S.C. § 6101(b)(2)(C) and FAR 16.505(b)(2)(i)(A).
☐ The Library's minimum needs can only be satisfied by contractor's unique capabilities or products. 41 U.S.C. § 6101(b)(1) and FAR 16.505(b)(2)(i)(B).
☐ A logical follow-on order in the interest of economy and efficiency. 41 U.S.C. § 6101(b)(1) and FAR 16.505(b)(i)(2)(C).
☐ To satisfy a minimum guarantee. 41 U.S.C. § 6101(b)(1) and FAR 16.505(b)(2)(D).
☐ Authorized or required by statute. 41 U.S.C. § 6101(b)(1) and FAR 16.505(b)(2)(E).
☐ The Library's minimum needs can only be satisfied by a brand-name product or item which is essential to the Government's requirement. 41 U.S.C. § 6101(b)(2)(B) and FAR 16.505(a)(4)(i).
☐ The Product is listed on the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

5. Rationale for Contracting Without Competition

We are authorized to limit competition on the basis of the citation in section 4 because: Industry-wide research was conducted, yielding very few vendors with the capability to provide this highly specialized service. The required audio equipment is no longer manufactured, cannot easily be found is good used condition, and demands niche technical expertise for repair and calibration. A solicitation posted on SAM.gov in May 2026 did not result in any additional qualified vendors able to perform this type and volume of work within the bounds of reasonable congressional appropriations.

Furthermore, after two full and open competitions, no other business has demonstrated the ability to meet the technical requirements or performance standards of the requirements as well. FET Electronics remains the only vendor with the proven capability to repair the above-listed equipment, supported by relevant experience, historical performance, and a verifiable track record with the Audio Lab. Their demonstrated technical proficiency, combined with their ability to perform the work within congressionally approved funding levels, establishes them as the sole responsible source for this requirement.

6. Actions to Overcome Barriers to Competition Before Subsequent Contract Is Required

State what actions, if any, the program office can take to overcome barriers to competition before a contracting for this requirement again, such as: using action to provide time to develop specifications for a competitive procurement by a certain date; licensing copyrights or patents so other

contractors may use the works; or breaking the requirement into parts that may be purchased competitively. If this is a one-time requirement, explain that action to increase future competition is not needed. If the source is expressly required by statute, state "Source is statutory."

To increase competition, we will: The Audio Lab supervisor and the COR will continuously monitor the industry to identify other qualified vendors for obsolete audio equipment repair.

7. Program Office Certification

I certify that the description of the Government's minimum needs, schedule requirements, and technical information that provide the basis for this justification are accurate and complete.

[redacted]

PART 3 – CONTRACTING OFFICER DETERMINATIONS & CERTIFICATION

8. Efforts to Solicit from As Many Potential Sources As Practicable

Unless a justification is based on FAR 6.302-2, Unusual and compelling urgency, contracting officers shall post justifications for other than full and open competition, including brand name justifications, to the Contract Opportunities website on sam.gov (or eBuy for Brand Name Justifications under FAR Part 8) prior to requesting a proposal or otherwise entering into negotiations.

- ☒ Advance notice will be published in sam.gov for 15 days before a contract is awarded. FAR 5.203(a).
- ☐ Advance or concurrent notice will be published in sam.gov for a reasonable time for commercial items FAR 5.203(a) and 12.204(b).
- ☐ Advance notice will not be published because the action meets the following FAR exception:
  - ☐ Notice would compromise national security. FAR 5.202(a)(1).
  - ☐ Unusual and compelling urgency; notice period would seriously injure Government. FAR 5.202(a)(2).
  - ☐ Expressly authorized or required to be made through another Government agency. FAR 5.202(a)(4).
  - ☐ Order will be placed against an IDIQ contract awarded under FAR 16.5. FAR 5.202(a)(6).
  - ☐ Order will be placed against GSA schedule or other competitively-awarded contract. FAR 5.202(a)(11).
  - ☐ Other:
- ☐ Advance notice will not be published per 41 U.S.C. § 6101; see attached deviation from the FAR per LCR 7-210 § 3.A.

We made the following efforts to interest potential sources in this award: The Library of Congress released a full and open solicitation for this work but did not obtain any technically acceptable proposals, nor any proposals where the price could be determined to be fair and reasonable.

9. Listing of Sources That Expressed Interest in Writing

The following sources expressed interest in this award: Businesses from the previous 2 competitions expressed interest in this requirement. But across 2 competition the Library did not obtain any technically acceptable proposals, nor any proposals where the price could be determined to be fair and reasonable.

10. Additional Information

The following additional information is relevant to this justification and approval: N/A

11. Contracting Officer Determination that Price Is Fair and Reasonable

As explained in detail below, I have determined that the prices for this contracting action are fair and reasonable based on comparison of the prices to the following (see FAR 15.404-1(b)(2)):

- ☒ Historical prices paid by the Government
- ☒ Library's Independent Government Estimate
- ☐ Other:
- ☐ Published competitive price lists
- ☒ Prices obtained through market research
- ☒ Prices obtained through competitive proposals

12. Contracting Officer Determination of Responsibility

☒ Checked System for Award Management (or will check in the case of competitive proposals for a brand name product)

13. Contracting Officer Determination of Best Value

I have determined that this action represents the best value to the Government because: A best value determination shall be made before an award is executed.

14. Contracting Officer Certification

I certify that, to the best of my knowledge and belief, this justification is accurate and complete. For those actions up to $900,000, I approve contracting without competition for this requirement.

James R. Robinson	James R. Robinson	06/25/2026
Name	Signature	Date