JUSTIFICATION AND APPROVAL FOR
OTHER THAN FULL AND OPEN COMPETITION
10 U.S.C. § 3205

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by Federal Acquisition Regulation (FAR) 12.102(b), FAR Class Deviation 25-21 Rev. 1 for FAR Part 12, FAR 6.103, FAR Class Deviation 25-11 for FAR Part 6 and in accordance with the requirements of RFO 6.104, the justification for the use of the statutory authority under RFO 6.103 is justified by the following facts and rationale required under RFO 6.104-1 as follows:

1. **Agency and Contracting Activity.**

   The Department of Homeland Security, United States Coast Guard (USCG), Aviation Logistic Center (ALC), Equipment Support Division (ESD) proposes to enter into a contract on a basis other than full and open competition.

2. **Nature and/or Description of the Action being Approved.**

   (a) Nature of the action: The USCG intends to procure, on a brand name basis, a one-time purchase order for the Hydraulic Trip Jacks for the HC-130J standup.

   (b) Name and address of the contractor:
   Columbus Jack Corp
   2222 S. Third Street
   Columbus, OH 43207-2402

   (c) Contract Type: Firm Fixed-Price Purchase Order

   [redacted]

   (g) Solicitation number: 70Z03826QE0000040

   (h) Background information about the requirement: The USCG currently operates a fleet of eighteen (18) HC-130J aircrafts that performs mission such as search and rescue, law enforcement and marine resource conservation. These Hydraulic Trip Jacks are necessary for the standup at Air Station Sacramento.

3. **Description of Supplies/Services.**
The USCG requires the purchase of Hydraulic Trip Jacks specifically designed for use with the Lockheed Martin C-130J Super Hercules aircraft. The tripod jack is used to safely lift and support the aircraft's wings during maintenance and repair operations. This equipment is essential for performing tasks such as landing gear servicing, wing inspections, and other critical maintenance procedures on the C-130J.

4. **Identification of Statutory Authority Permitting Other Than Full and Open Competition.**
The statutory authority permitting other than full and open competition is 10 U.S.C. § 3205 as implemented by RFO 12.102(b), and RFO 6.103 and in accordance with the requirements of RFO 6.104.

5. **Identification of Exception to the Buy American Statute**.
There is no exception to the Buy American Act RFO 52.225-1 will be included in the purchase order.

6. **Demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires use of the authority cited.**

   (a) Columbus Jack Corporation is the only vendor able to provide 30 ton wing jacks that meet Coast Guard specifications and safety requirements.

   (b) Market research confirmed only Columbus Jack Corporation can supply the required jacks, and no part of the requirement can be competed separately.

   (c) Other vendors, modifications, or leasing were considered but none met technical, safety, or operational needs.

   (d) Without approval, critical aircraft maintenance will be delayed, reducing Coast Guard mission readiness.

   (e) Rationale for use of the nonavailability exception to the Buy American statute, including detailed information explaining why the particular articles, materials, or supplies of the class or kind to be acquired, either as end items or components, are not mined, produced, or manufactured in the United States in sufficient and reasonably available commercial quantities and of a satisfactory quality.
   Not Applicable

7. **Description of Efforts Made to Ensure that Offers are Solicited from as Many Potential Sources as is Practicable.**

   (a) If an entry was made in APFS, provide the publication date.

   5/12/2026

   (b) If an announcement has already been made in SAM.gov, provide the publication date.

   This acquisition is forecasted in the Department of Homeland Security (DHS) Acquisition Planning Forecast System (APFS), number F2026073802 published on 06/03/2026. There were no responses received as a result of the APFS posting.

   (c) If an announcement is planned for posting in SAM.gov, provide the estimated publication date.

   Estimated publication date is 06/22/2026

   (d) If an announcement will not be published, identify the applicable exception under RFO Part 5.

   Not Applicable

8. **Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable.**

   The Contracting Officer determines that the anticipated prices will be fair and reasonable in accordance with FAR 15.404-1. The prices will be determined fair and reasonable based on a comparison of proposed pricing with prior Asset Maintenance Management Information System (AMMIS) history and the IGCE.

9. **Description of Market Research.**

   (a) Describe the market research techniques used, results, date(s) when the market research was conducted, and how the contracting officer used the market research to determine price reasonableness.

   Market research was conducted to identify new sources of supply and/or services necessary to maintain the aircraft fleet. Market research for this requirement was conducted using AMMIS, FEDLOG, WEBFLIS, and the Internet for potential supply sources and only one source was identified.

   (b) Describe the market research results that support the determination that the items are non-available.

   Not Applicable

(c) If market research was not conducted, state why.

Not Applicable

(d) If patents, copyrights, and/or intellectual property are applicable to the acquisition, describe the circumstances for acquiring a patented or copyrighted product on the representation of the intellectual property holder that has not been licensed for resale and consult with the Coast Guard IP attorney.

Not Applicable

10. A Listing of the Sources, if Any, that Expressed, in Writing, an Interest in the Acquisition.

(a) An explanation why technical data packages, specifications, statement of work, or purchase descriptions are not suitable for full and open competition.

Columbus Jack Corp is the only approved authorized distributor, therefore this requirement is not suitable for full and open competition.

(b) Discuss why your requirement cannot be modified to enhance competition.

This requirement cannot be modified to enhance competition because the components and the technical data are not available from any distributor other then the OEM or an OEM authorized distributor.

(c) For a proposed contract subject to the restrictions of RFO 6.103-for follow-on acquisitions as described in 6.103-1©(2)(i), all components must provide an estimate of the cost to the Government that would be duplicated and detailed information on how the estimate was derived.

Not Applicable

(d) For a proposed contract subject to the restrictions of RFO 6.103-2© or HSAR 3006.103-2©(70), HSAR Class Deviation 25-01 and where RFO 6.103-2 is cited as the authority, describe the exceptional circumstances allowing for an award for a period of performance in excess of the one-year limitation (applicable to all federal agencies) or the DHS-specific statutory 150-day limitation.

Not Applicable

11. A Listing of the Sources, if Any, that Expressed, in Writing, an Interest in the Acquisition.

- Not Applicable

12. A Statement of the Actions, if Any, the Agency May Take to Remove or Overcome Any Barriers to Competition Before Any Subsequent Acquisition for Supplies or Services Required.

(a) Will the Government revise overly technical specifications, acquire data rights, etc.?

At this time the USCG does not possess the technical data required to foster a full and open competition. The USCG will continually conduct market research to ensure that companies interested in doing business with the USCG are given every opportunity to compete for future USCG requirements.

(b) When a J&A is issued for the purposes of acquiring goods or services while a competitive procurement is being conducted, the justification should include a detailed timeline for completion of the competitive procurement. The period of performance for the sole source action should fairly balance the time needed to complete the competitive procurement. The focus should be on minimizing the need for additional sole source awards.

Not Applicable

13. Contracting Officer's Certification.

I certify that the data supporting the recommended use of other than full and open competition is accurate and complete to the best of my knowledge and belief.

[redacted]

14. Technical/Requirements Personnel Certification.

[redacted]

RECOMMENDED FOR APPROVAL:

[redacted]