United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION

This document sets forth the justification and approval as required by FAR 6.103.

1. Identification of the Agency and the Contracting Activity:

   The Department of the Interior, Bureau of Land Management (BLM), Western Montana District, requests the Montana DOI Procurement, to contract on a limited or sole source basis.

2. Nature and/or description of the action being approved:

   Immediate repair and restoration is required due to complete system failure, resulting in significant security and access control vulnerabilities. Failure to restore these systems immediately will result in continued noncompliance with Federal physical security standards, increased risk to personnel, assets, and operations, and impairment of the Government's ability to meet minimum facility security requirements necessary for occupancy and operation.

   The Dillon and Missoula facilities currently do not have operational physical security systems. Doors are not functioning in Fail Safe or Fail Secure modes in accordance with BLM policy, and individual access controls are non-functional. As a result, the facilities are experiencing substantial lapses in both security and controlled access.

   Given the current inoperable condition of the system and associated security risks, immediate corrective action is warranted to restore full functionality and ensure compliance with security requirements.

3. A description of the Supplies or Services required meeting the Agency's needs, including the estimated value:

   Work includes examination, diagnosis, repair, and restoration of all malfunctioning system components; updates to all relevant C•CURE 9000 software and associated licenses; and identification of any additional hardware or software required to achieve full system functionality. The system shall be restored to full operational capability to the greatest extent possible, including access control, intrusion detection, and alarm monitoring, in compliance with Interagency Security Committee (ISC) standards and applicable Federal physical security requirements. All work shall be performed by a Software House-certified C•CURE 9000 technician.

   Software update and troubleshooting [redacted]

4. An identification of the statutory authority permitting other than full and open competition:

   Select one of the following:

   __ 41 U.S.C. 3304 (a) (1), only one responsible source and no other supplies or services will satisfy agency requirements as implemented by FAR 6.103-1.
   _x_ 41 U.S.C. 3304 (a) (2)), unusual and compelling urgency as implemented by FAR 6.103-2.
   __ 41 U.S.C. 3304(a) (3)), industrial mobilization; engineering, developmental, or research capability; or expert services as implemented by FAR 6.103-3.
   __ 41 U.S.C. 3304 (a) (4)), international agreement as implemented by FAR 6.103-4.
   __ 41 U.S.C 3304 (a) (5), authorized or required by statute as implemented by FAR 6.103-5.
   __ 41 U.S.C. 3304(a) (6), national security as implemented by FAR 6.103-6.
   __ 41 U.S.C. 3304 (a) (7)), public interest as implemented by FAR 6.103-7.

5. A demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires use of the authority cited:

   The physical security system in place at the Dillon and Missoula facilities operates on proprietary C•CURE software, which requires certified technicians with specialized training and authorized access to perform diagnostics, repairs, and system updates. The system manufacturer, Software House, restricts support to certified third-party providers, limiting the pool of qualified vendors.

   Comprehensive market research was conducted, during which six separate vendors were contacted to determine capability and interest in performing the required work. Of these vendors, only Black Star Security Systems responded and demonstrated the required qualifications, including certification to work on C•CURE systems. This lack of vendor response further substantiates the limited availability of capable sources.

   Additionally, Black Star Security Systems possesses unique, firsthand knowledge of the existing system. Mr. Michael Lutz, owner of Black Star Security Systems, was involved with the original security system installation at the BLM Missoula Field Office while employed by Integrated Security Solutions. During this time, he developed detailed knowledge of the system architecture, panel programming, wiring layout, and site-specific configurations. Knowledge not available to other vendors.

   Engaging a contractor without this institutional knowledge would require significant time and expense to conduct system discovery and reverse engineering, increasing both cost and schedule risk to the Government, and potentially resulting in incomplete or inaccurate system restoration.

   Given (1) the proprietary nature of the system, (2) the requirement for certified technicians, and (3) the results of market research indicating only a few qualified vendors the use of FAR 6.302-2 procedures is appropriate.

5. A description of efforts made to ensure that offers are solicited from as many potential sources as practicable, including whether a notice was or will be publicized as required by FAR Subpart 5.1 and, if not, which exception under FAR 5.101 applies:

A public notice for this acquisition was not posted because the total anticipated value is below the $20,000 threshold, thereby qualifying for an exception to the requirement for publicizing contract actions in accordance with FAR 5.101(a). Furthermore, this procurement meets the criteria for using other than full and open competition as set forth in FAR 6.103, which references the use of procedures authorized under conditions of unusual and compelling urgency, which is another exception to posting a notice.

Due to the proprietary nature of the physical security system and the urgent need for specialized maintenance and support, the Contracting Officer has determined that the procedures under FAR 6.103-2 for unusual and compelling urgency are appropriate. In accordance with these procedures, the Contracting Officer will solicit offers from the only two small business vendors identified through comprehensive market research as capable of fulfilling the requirement: Black Star Security Systems and Integrated Security Systems. Both vendors possess the necessary certifications and direct experience with the C•CURE software and system architecture, ensuring they can perform diagnostics, repairs, and updates without additional discovery or risk to the Government's schedule and budget.

This approach maximizes competition to the extent practicable within the constraints imposed by the system's proprietary requirements and urgent operational needs. It also ensures compliance with FAR and agency guidelines for fair and reasonable procurement, while minimizing disruption to critical facility operations.

6. A determination By the Contracting Officer that the anticipated cost to the Government will be fair and reasonable:

   The contracting officer determines that the anticipated cost to the government will be fair and reasonable. This acquisition will be competed between the two qualified vendors to ensure the best value for the Government. In instances when certified cost and pricing data are required, an analysis of cost information will be performed, considering field pricing reports, commerciality, procurement history, and other available cost and pricing information in determining price reasonableness. Additionally, since one of the vendors holds a GSA contract, those GSA schedule prices will be used as a benchmark to further ensure that all proposed prices are fair and reasonable.

7. A description of the Market Research conducted (see FAR Part 10) and the results or a statement of the reason Market Research was not conducted:

   The Western Montana District conducted market research utilizing SAM.gov (NAICS 561621) and direct outreach to local and regional vendors. Six vendors were contacted to determine capability and interest. Market research results demonstrate that no other vendors possess both the required C•CURE 9000 certification and system familiarity necessary to perform the work. The following vendors were contacted:

   - *Black Star Security systems- Michael Lutz Kalispell, MT*
     - *SAM UEI: HCYTPFGEF1H3, CAGE: 11VK6*
     - *Owner and Lead Technician of Black Star Security LLC,*
     - *Qualified*

- *Johnson Controls- called to inquire about a service call and we need to have an existing agreement with them. I was directed to an out-of-country call Center.*
    - *In SAM- LFD2YFMZJ1J3*
    - *Large Business*
- *Integrated Security Systems under the umbrella of Johnson Controls?*
    - *SAM- YWLLJBHSE9A4*
    - *Original installer company out of Kalispell MT. Tried to call and got the same Johnson Controls call center. Could not talk with a technician but should be able to complete this requirement.*
    - *GSA Advantage contract*
    - *Qualified*
- [redacted]
    - *In SAM – not found*
    - *NOT Qualified*
- [redacted]
    - *In SAM- yes*
    - *Called with no return call*
    - *NOT Qualified*
- [redacted]
    - *NOT Qualified*

8. Any other facts supporting the use of Other Than Full and Open Competition, such as: (i) explanation of why technical data packages, specifications, engineering descriptions, statement of work, or purchase descriptions suitable for full and open competition have not been developed or are not available, (ii) When 6.103-1 is cited for follow-on acquisitions as described in 6.103-1(c)(2), an estimate of the cost to the Government that would be duplicated and how the estimate was derived., (iii) When 6.103-2 is cited, data, estimated cost, or other rationale as to the extent and nature of the harm to the Government.

   Award to a source other than Black Star Security Systems or Integrated Security Systems would result in unnecessary duplication of cost and unacceptable delay. This further supports the determination that full and open competition is not practicable and would not meet the Government's minimum needs within required timeframes. A new contractor would be required to perform a full discovery and reverse-engineering of the proprietary C•CURE system, including verification of devices, wiring, and programming, estimated at 40–80 labor hours based on similar efforts. Additional Government costs would also be incurred through a formal competitive procurement process, including labor for solicitation development, proposal evaluation, and award, despite market research confirming that six vendors were contacted and only one was responsive and qualified. There is no reasonable expectation that further competition would yield additional capable sources. Any alternate contractor would also require additional time to obtain system familiarity and coordinate with the proprietary software provider, further delaying restoration. These delays are unacceptable, as the Dillon and Missoula facilities currently have nonfunctional security systems and are not meeting Federal physical security standards; this creates a significant vulnerability and increases risk to personnel, assets, and operations, necessitating immediate corrective action.

In accordance with Federal physical security standards, including Interagency Security Committee (ISC) guidelines and Department of Homeland Security risk management principles, an inoperable security system in a facility housing Federal employees constitutes an unacceptable vulnerability that significantly degrades the facility's protective posture. Physical security systems – such as access control, intrusion detection, and alarm monitoring – are baseline safeguards required to deter, detect, and delay unauthorized access and potential threats. When these systems are nonfunctional, the Government is unable to meet minimum security standards for occupancy, thereby increasing the risk of unauthorized entry, workplace violence, theft of sensitive assets, and potential harm to personnel. Immediate repair is therefore essential to restore compliance, ensure continuity of operations, and fulfill the Government's obligation to provide a safe and secure working environment for its employees.

9. A listing of the sources, If any, that expressed in writing, an interest in the acquisition:
    - *Black Star Security systems- Michael Lutz Kalispell, MT*
        - *SAM UEI: HCYTPFGEF1H3, CAGE: 11VK6*
        - *Owner and Lead Technician of Black Star Security LLC,*
        - *Qualified*
    - *Integrated Security Systems under the umbrella of Johnson Controls?*
        - *SAM- YWLLJBHSE9A4*
        - *Original installer company out of Kalispell MT. Tried to call and got the same Johnson Controls call center. Could not talk with a technician but should be able to complete this requirement.*
        - *GSA Advantage contract*
        - *Qualified*

10. A statement of the actions, if any, the agency may take to remove or overcome any barriers to competition before any subsequent acquisition for the Supplies or Services required:

    This non-competitive procurement will serve as a bridge to restore critical security systems while allowing time to prepare for future competitive acquisitions and to maximize competition to the greatest extent practicable. These actions are intended to reduce or eliminate barriers to competition in future acquisitions. Once the current system is operational, the Government will develop competitive specifications for subsequent procurements, targeting completion by Q4 FY26. Efforts will include breaking out major components, subsystems, or economically severable activities that can be purchased competitively, and developing definitive specifications, drawings, or data to support competition. The statement of work will also be reviewed and revised as needed to maximize potential vendor responses.

    Additionally, BLM Montana-Dakotas has hired a Physical Security Specialist to assist with ongoing maintenance and preventive actions, helping ensure system reliability and providing sufficient lead time to plan competitive procurements. If this acquisition remains within budget, further procurements for system upgrades to bring the offices into full compliance with current Federal physical security standards are anticipated. These steps will reduce reliance on other than full and open competition procedures in the future and increase opportunities for competition while maintaining uninterrupted security coverage.

11. Certification:

I certify that any supporting data that is the responsibility of technical or requirements personnel (i.e. verifying the Government's minimum needs or schedule requirements or other rationale for other than full and open competition) and which form a basis for the justification have been certified as complete and accurate:

(Signature) KATHLEEN MARKS Digitally signed by KATHLEEN MARKS Date: 2026.04.08 14:56:06 -06'00' (Date) 4/8/2026

(Type or Print Name): Kathleen Marks

Contracting Officer's Representative

I certify that the justification is accurate and complete to the best of my knowledge and belief:

(Signature) JORGE ALVAREZ Digitally signed by JORGE ALVAREZ Date: 2026.04.09 07:22:40 -06'00' (Date) 4/9/2026

(Type or Print Name): Jorge Alvarez

Contracting Officer