MEMORANDUM FOR INDUSTRY PARTNERS

FROM: AFMC/AFTC/PZIA (Arnold)
100 Kindel Drive
Arnold AFB, TN 37389-1332

SUBJECT: AEDC Velocity Alliance – Request for Whitepaper: Question & Answers

1. Would you all have any interest in a company to run the AEDC Velocity Alliance OTA Consortium?
    a. The Government will manage the consortium internally.

2. I didn't see that asphalt paving was included in this project. My question is will there be any paving included.
    a. A standalone paving project could be competed within the AEDC Velocity Alliance by leveraging the existing "General Construction" category.

3. I am writing to clarify the partnership requirements for the RFWP. Specifically, does the Alliance Membership require us to identify a Non-Traditional Defense Contractor (NDC) or a small business as a partner? Over the last five years, our projects for the Air Force and DOE have involved partnerships with five universities and two national laboratories.
    a. The answer is yes, the Alliance Membership requires you to identify a partner that meets a specific statutory definition, and your university partners are highly likely to satisfy this requirement.

    Here is a more detailed explanation to guide your whitepaper submission:

    1. The "Why" Behind the Requirement
    As detailed in "Part 4: Innovation and Partnership Capability" of the RFWP, the purpose of this requirement is to satisfy the legal conditions for using this type of Other Transaction authority (specifically 10 U.S.C. § 4022(d)(1)(A) or (B)). This means that to join the Alliance, each prospective member must demonstrate an established relationship with a partner that falls into one of the following categories:
    - A Non-Traditional Defense Contractor (NDC)
    - A Small Business
    - A Nonprofit Research Institution

    2. How Your University and National Laboratory Partners Fit
    This is where your specific experience is highly relevant.
    - University Partners (Excellent Candidates): Your extensive partnerships with universities are a perfect fit. Universities typically qualify as "nonprofit research institutions" under the statute. Your whitepaper should identify one of your university partners by name and CAGE code and, as noted in the RFWP (Note 2), be prepared to confirm their 501(c)(3) or equivalent nonprofit status. By doing this, you would be demonstrating your capability to satisfy condition (A) of the requirement.

- National Laboratories (Potential Candidates): Partnerships with National Laboratories are also highly valued. Depending on the specific lab and its managing entity, it could potentially qualify as a nonprofit research institution. However, the most direct and clearly defined path, based on the notes in the RFWP, is to leverage your strong relationships with your university partners.

3. Your Path Forward
For your whitepaper submission, your strongest approach is to:

1. Select one of your university partners to feature in your "Part 4" response.
2. Provide the university's or laboratory's name and CAGE code and provide justification on how the university or laboratory meets 10 U.S.C. § 4022(d)(1)(A) or (B)
3. Describe your existing relationship and their unique capabilities.
    b. Crucially, link their capabilities directly to the technical project you described in your "Part 2" response, explaining how they could participate to a "significant extent" in a similar future project.

4. We are interested in responding to the AEDC Velocity Consortium Call for White Papers but have a question about the partnership requirements. The company that I work for already qualifies as a small business. Because we qualify as a small business do we still need to partner with another small business, university, or National Laboratory to meet this requirement?
    a. Thank you for your question. This is an excellent point of clarification as it highlights a unique scenario for a prime contractor that is already a small business.

The direct answer is: Yes, even as a small business, your company is still required to identify at least one partner company in your whitepaper response to satisfy the "Part 4: Innovation and Partnership Capability" requirement.

Here is the detailed rationale to guide your submission:

1. The Purpose of the Requirement: Demonstrating Partnership Capability
The primary purpose of the Part 4 requirement is not just to verify a company's status; it is to evaluate a prospective member's capability to form innovative partnerships. The Government needs to see that every member of the Alliance, regardless of their own size or status, has the ability to "reach back" and build effective teams with other specialized companies. This ensures a dynamic and collaborative industrial base for all future projects.

Therefore, simply stating that your own company is a small business, while valuable, does not demonstrate this crucial partnership capability.

2. How to Meet the Requirement as a Small Business
Your status as a small business gives you two clear and powerful paths to satisfy this requirement in your whitepaper. You must show how you would form a team that satisfies one of the following conditions:

Option A: Partner with a Non-Traditional Defense Contractor (NDC) or Nonprofit Research Institution.

- In your whitepaper, you would identify an NDC or a Nonprofit Research Institution.
- You would then explain how this partnership would satisfy condition (A) of the statute ("at least one nontraditional defense contractor...participating to a significant extent").
- This is a very strong approach as it demonstrates your ability to bring in partners with a different status than your own.

Option B: Partner with another Small Business.

- In your whitepaper, you would identify another small business as your partner.
- You would then explain how this partnership would satisfy condition (B) of the statute ("All significant participants...are small businesses").
- This is also a perfectly valid approach that demonstrates your ability to build teams within the small business community.

3. Your Path Forward

For your whitepaper submission, you should:

- Choose one of the two options above.
- Select a specific partner company (an NDC, a university, or another small business) that you have an existing relationship with.
- In your "Part 4" response, provide the partner's name and CAGE code.
- Crucially, link that partner's capabilities to the technical project you described in your "Part 2" response, explaining how you would work together and how their participation would be "significant."

In summary, the requirement is less about *what your company is* and more about *what your company can do* in terms of building strong, compliant teams. We look forward to seeing your submission.

5. Is it the Government's intent to issue future Velocity Alliance solicitations to all consortium members regardless of SOO type? In other words, does the Government intend to in any way filter or limit solicitations consortium members will see based on our demonstrated competencies during the onboarding phase?
    a. The direct answer is: Yes, it is absolutely the Government's intent to issue all Project Opportunity Announcements (POAs) to all consortium members, regardless of the project's SOO type.

    Here is a more detailed explanation of the process and rationale:

    1. Fair and Open Opportunity for All Members

    The fundamental principle of the Alliance is to create a fair, competitive ecosystem among a pre-qualified pool of vendors. The Government will not filter or limit the distribution of POAs based on the competencies you demonstrated during the onboarding phase.

    When you are accepted into the Alliance, you are accepted into the entire enterprise. You will have full visibility on every single project opportunity, from "General Construction" to "Utilities," and everything in between.

2. The Onboarding Phase vs. the Project Competition Phase
It is helpful to think of this as a two-stage process:

- Onboarding Phase (The "Entry Gate"): The purpose of your whitepaper, including your response to the technical questions, is to prove you have the minimum required technical competence and partnership capability to be a member of the Alliance. It is your ticket to get in the door.

- Project Competition Phase (The "Performance Arena"): Once you are a member, it is then your business decision to determine which specific Project Opportunity Announcements (POAs) you wish to pursue. You are responsible for assessing your company's strengths, capabilities, and capacity to decide whether to submit a proposal for a given project.

3. The Vendor's Responsibility
The Government's responsibility is to ensure every member sees every opportunity. The member's responsibility is to "know your company"—to analyze each POA and make a smart business decision about whether their team has the right qualifications to submit a competitive proposal for that specific scope of work.

In summary, we will not be creating sub-pools or specialized lists. All members will see all opportunities, ensuring a level playing field for every project competed under the AEDC Velocity Alliance.

6. Once the consortium is established, does the Government intend to use white papers or similar means to down-select qualified performers for a given requirement/solicitation?
    a. The Government's primary goal is to use the most efficient and effective means to select a performer for each project. While a single-step proposal process is often the most streamlined approach, the specific competitive procedure will be tailored to the unique needs of each requirement.

    Project Opportunity Announcements (POAs) could be down-selected utilizing a variety of methods. These may include, but are not limited to:

    - Whitepapers
    - Full-blown Prototype Proposals
    - Oral Presentations
    - Or any other means the Government determines to fit that particular POA.

    The specific competitive procedure, including the format of the required response and the evaluation criteria, will be clearly defined within the POA for each project.

    This approach provides the Government with the necessary flexibility to structure each competition in a way that best ensures a successful outcome, while also providing a clear and fair opportunity for all Alliance members to participate.

7. In the “Request for White Papers for Membership in the AEDC Velocity Alliance” Document: Under the section “Part 2: Technical Competency” it states that the response should not exceed 10 pages. Later in “Section 7.0 Submission and Key Information” the document says the total submission must not exceed 10 page limit. Please clarify requirements for submission length. Is the entire White Paper limited to 10 pages or only “Part 2 Technical Competency”? If entire White Paper is limited to 10 pages, does that include the cover page?
    a. To clarify: The ten (10) page limit applies to the entire Whitepaper submission.

       Here is a detailed breakdown to guide you:

       Total Submission Limit: The entire document you submit—from the beginning of Part 1 to the end of Part 4—must not exceed ten pages. The statement in Section 7.0 ("the total submission must not exceed the ten page limit") is the governing requirement.

       Cover Page: A separate cover page is not required and not recommended. To maximize your space, the RFWP requires you to begin your Part 2 response with your company name and CAGE code, effectively making the first page of your technical response your cover page. If you choose to include a separate cover page, it will count towards the ten-page limit.

       How to Structure Your Submission: Your submission should be a single, continuous document that addresses all four parts of the requirement within the ten-page total. This includes:

       Part 1: Your statements of CMMC and JCP compliance (and CMMC roadmap, if applicable).

       Part 2: Your company name/CAGE code and your response(s) to the technical questions.

       Part 3: Your verbatim IP acknowledgement statement.

       Part 4: Your response detailing your partnership capability.

       We recommend being as concise as possible across all four parts to ensure you can provide a thorough technical response in Part 2 while staying within the mandatory ten-page limit for the entire document.

8. Can Controlled Unclassified Information (CUI) be included in the Technical Competency rationale? If so, can the DOD SAFE application be used to email White Paper submission?
    a. Yes, you may include CUI in your whitepaper submission. Given that much of the work relevant to the Program Objectives may be sensitive in nature, we understand that your project descriptions may contain information that is appropriately marked as CUI.

       However, please be advised that submissions must not, under any circumstances, contain classified information. Any submission containing classified material will be rejected and handled as a security incident.
    b. No, the DoD SAFE application should not be used for your submission.

As detailed in the Request for Whitepaper, all submissions are to be sent directly via standard email to the address provided. Your company's compliance with the mandatory security requirements (either a validated CMMC Level 2 certification or a current NIST SP 800-171 Assessment in SPRS) serves as the basis for this requirement. This compliance demonstrates that your own systems are capable of protecting CUI, and therefore, you are expected to handle the electronic transmission accordingly.

Please adhere to the submission instructions outlined in Section 7.0 of the RFWP.

9. We understand that this path requires a current NIST SP 800-171 DoD Assessment posted in SPRS together with a CMMC Level 2 compliance roadmap. We also understand the Statement of Understanding language regarding the November 2026 CMMC Level 2 deadline.

   Our question is whether a vendor would be considered responsive for consortium onboarding if the whitepaper includes a current SPRS-posted NIST SP 800-171 assessment and a detailed phased roadmap, but the roadmap reflects achievement of full CMMC Level 2 certification after November 2026 due to assessor availability and implementation lead time.

   If not, please confirm that full CMMC Level 2 certification by November 2026 is a hard prerequisite for any vendor relying on the alternative compliance path.
   (Answer Revised 21 Apr 26)
   a. We understand that C3PAO availability and implementation lead times present challenges across the industrial base; however, the security requirements for the AEDC Velocity Alliance are firm.

      Direct Answer:
      No, a whitepaper would not be considered responsive if the submitted roadmap explicitly reflects the achievement of full CMMC Level 2 C3PAO Certification *after* the November 2026 deadline.

      Rationale:
      As stated in the revised Section 4.0, Part 1 (B) Alternative Compliance Path of the Request for Whitepapers, the submission requirement explicitly mandates that the roadmap must:
      "detail the vendor's plan and timeline to achieve full CMMC Level 2 C3PAO Certification by the November 2026 deadline, and must specifically address... The vendor's planned timeline and evidence of engagement with a C3PAO to conduct the final certification assessment prior to the November 2026 deadline."

      Submitting a roadmap that targets a completion date beyond November 2026 fails to meet this explicit submission requirement. Furthermore, by submitting a whitepaper, a vendor must agree to Section 6.0, Statement of Understanding, which states the vendor agrees they must achieve and provide proof of full CMMC Level 2 C3PAO Certification by that specific deadline to maintain an active agreement. The Government cannot evaluate a submission as a "Pass" if the vendor's own documentation states upfront that they plan to miss this mandatory agreement deadline.

Confirmation:
We confirm that presenting a viable, detailed roadmap to achieve full CMMC Level 2 C3PAO Certification by November 2026—including timelines for POA&M closure and C3PAO engagement—is a hard prerequisite for any vendor relying on the alternative compliance path to successfully pass the Part 1 evaluation gate.

10. Are you able to provide a forecast for 2026/2027 and beyond spending or potential projects.
    a. While the Government cannot guarantee specific project volumes or funding amounts prior to the issuance of individual Project Opportunity Announcements (POAs), we can provide the following high-level forecast to help you gauge the scale of this initiative:

        - Near-Term Forecast (FY26 - FY27): At this time, the Government is tracking approximately 135 planned projects spanning through Fiscal Year 2027. The total estimated value for this near-term pipeline is approximately $550 million.

        - Long-Term Horizon (Through FY32): As designed, the AEDC Velocity Alliance will serve as the primary execution vehicle for a multi-billion-dollar infrastructure modernization portfolio anticipated to run through Fiscal Year 2032.

        Please note that these figures are estimated forecasts for planning purposes only. All future projects will fall within the scope of the 15 technical categories detailed in Atch 1 - AEDC Velocity Alliance Program Objectives. Actual funding, scope, and execution will be firmly established at the individual project level via POAs, which will be competed exclusively among accepted Alliance members.

11. Can you provide an example of the types of projects that would be competed and awarded for under this alliance?
    a. The AEDC Velocity Alliance is designed to execute a diverse and complex portfolio of infrastructure sustainment, restoration, and modernization projects. To understand the specific types of projects that will be competed, vendors must refer directly to Atch 1 - AEDC Velocity Alliance Program Objectives.

        This document outlines the 15 distinct technical categories that define the scope of the Alliance. Examples of work under these categories include, but are not limited to:

        - Process Systems: Designing and installing complex High Pressure (>150 PSIG) or Hazardous process piping systems to support advanced test cells.

        - Electrical Infrastructure: Upgrading High Voltage (>6.9kV) substations or installing new Medium Voltage distribution networks for large industrial motors.

        - Specialized Construction: Erecting heavy industrial structures or modifying existing facilities to accommodate new, specialized test equipment.

- Engineering Services: Providing advanced Mechanical or ID&C (Instrumentation, Data, and Control) engineering services to solve unique, high-temperature, or high-vibration challenges.

Further Detail: While Atch 1 provides the foundational scope, the Government intends to provide more specific, near-term project examples and detailed technical context to those vendors who are successfully evaluated and invited to the mandatory site visit.

12. How many seat holders do you expect to award for this alliance? If this is strictly a pass/fail grading, there may be too many seat holders to make the contract attractive for some companies, and, a more stringent selection criteria would provide a more selective, qualified, and competitive field for a successful execution.
    a. The Government does not have a pre-determined or capped number of "seat holders" for the AEDC Velocity Alliance. Our objective is to onboard as many highly qualified vendors as possible who can successfully pass the rigorous, four-part evaluation criteria established in the Request for Whitepapers (RFWP).

    We understand the concern regarding a potentially crowded field, but this strategy is deliberate and necessary for the following reasons:

    - Unprecedented Scale and Speed: The Alliance is not a typical IDIQ contract; it is a multi-billion dollar, enterprise-level modernization effort projected through FY32. The sheer volume and velocity of the anticipated work require a massive, dynamic, and readily available industrial base. A small, artificially limited pool of vendors would quickly become a bottleneck, endangering critical national security timelines.

    - Diversity of Capabilities: The 15 technical categories in the Program Objectives are highly diverse (e.g., High Voltage Electrical, Hazardous Process Systems, ID&C Engineering). No single company, or even a small group of companies, possesses the capacity to excel in all of them simultaneously at the required scale. We need a broad ecosystem of specialists.

    - Teaming and Subcontracting Opportunities: The Alliance is designed to foster a collaborative industrial ecosystem. Membership is not only an opportunity to serve as a Prime Contractor. It is an equally significant opportunity for Small Businesses, Non-Traditional Defense Contractors (NDCs), and Non-Profits to serve as critical subcontractors participating to a "significant extent" on complex prototype projects. A larger pool of members facilitates the rapid formation of these necessary, highly specialized teams for specific project awards.

    - The True Competition Occurs at the Project Level: The pass/fail criteria for entry—while stringent in requiring verifiable CMMC compliance, proven technical competence, and demonstrated innovation partnerships—is only the *first* competitive gate. The true competition occurs when Project Opportunity Announcements (POAs) are released. Only those members who can assemble the

best team, propose the best technical solution, and offer the best value will win the actual, funded work.

The AEDC Velocity Alliance will only be executed successfully if we can onboard a broad spectrum of vendors with the proven ability to execute the Program Objectives and the agility to team with the appropriate partners. The current evaluation criteria are calibrated to achieve that specific intent.

13. Will the site visit be conducted as a group, or per vendor.
    a. The Government's current intent is to conduct the mandatory site visits in group settings. Depending on the number of successfully evaluated vendors who pass the initial whitepaper review, we anticipate hosting either one large group session or multiple, smaller group sessions during the designated site visit window (1 June 2026 – 30 June 2026 for Onboarding Opportunity 1).

       We will not be conducting individual, per-vendor site visits.

       For Opportunity 2 (and subsequent opportunities), the specific date will fall within the published onboarding window (e.g., 1-30 September 2026). The Government may announce the exact date and logistical details publicly via a formal Amendment to the Request for Whitepaper (RWP). Alternatively, the Government reserves the right to communicate the specific date directly and exclusively to those vendors who successfully pass the whitepaper evaluation phase. Vendors are advised to monitor the solicitation posting for updates, but should plan for the event to occur within the established monthly window. (Amended 14 Jun 26).

14. Is there an expected process for competition of the possible projects; will awards be based on best value or lowest price evaluations? Will the contracts be firm fixed price, cost plus fixed fee, or another contract type?
    a. The short answer is that the specific evaluation process and agreement type will be uniquely tailored and explicitly established within each Project Opportunity Announcement (POA). The Other Transaction Authority (OTA) provides the Government with the flexibility to use the most appropriate strategy for each specific requirement.

       However, to help you understand our general approach and expectations:

       - Evaluation Process (Best Value vs. LPTA): The Government strongly anticipates that the vast majority of projects competed within the Alliance will be evaluated on a Best Value basis. Given the complex engineering, specialized industrial construction, and prototyping nature of the Program Objectives, selecting the solution that provides the highest overall value—considering technical approach, schedule, risk, and price—is critical to mission success. While Lowest Price Technically Acceptable (LPTA) may be used for highly commoditized or straightforward tasks, it will not be the standard approach.

- Agreement Type (FFP vs. Cost-Reimbursable): Similarly, the Government generally leans towards utilizing Firm-Fixed-Price (FFP) milestone-based payment structures for Project-Level Agreements under this OTA. This structure provides clear incentives for performance and schedule adherence. While cost-reimbursable arrangements (e.g., CPFF) are permitted under an OTA and may be considered for high-risk, early-stage prototyping efforts, FFP is expected to be the predominant arrangement for the sustainment, restoration, and modernization projects outlined in the SOO.

In summary: While we anticipate a strong preference for Best Value and Firm-Fixed-Price structures, the definitive rules of engagement for any given competition will always be provided in the specific POA.

15. Are any of the designs used under the Velocity Alliance consortium going to be used as a FARM III task order?
    a. Thank you for this highly specific and important question regarding the transition of work between the AEDC Velocity Alliance and other existing contract vehicles, such as FARM III.

       The direct answer is: Yes, it is possible, but that determination will be made on a case-by-case, project-specific basis prior to releasing the POA.

       The AEDC Velocity Alliance is specifically designed to rapidly prototype, develop, and validate complex engineering solutions and infrastructure modifications. As outlined in the RFWP, a key benefit of this OTA authority is the ability to transition successfully completed prototypes into follow-on production or broader implementation.

       Therefore, if a vendor successfully completes a design or a "proof of concept" (as defined under 10 U.S.C. § 4022(e)(5)(A)) through a Project-Level Agreement under the Alliance, the Government has several options for how to execute the subsequent construction or implementation phase.

       1. Transition to FARM III (or similar FAR-based vehicle):
       If the resulting design is finalized, validated, and deemed ready for standard, large-scale construction that does not require further prototyping or agile development, the Government may choose to take that completed design and compete the physical construction effort as a task order under an existing contract vehicle like FARM III.

       2. Follow-on Production under the Alliance:
       Alternatively, if the project meets the statutory criteria (i.e., it was competitively awarded under the Alliance and successfully completed the prototype phase), the Government retains the authority to issue a non-competitive follow-on production agreement directly to the successful Alliance member to execute the construction based on their design.

       3. Continued Operational Utility:

As detailed in the overarching strategy, some projects may remain entirely within the Alliance as an "Operational Utility Prototype," where the design, development, and implementation are all executed iteratively within the prototype framework.

Conclusion:
The Government will evaluate multiple project-specific variables—including the complexity of the design, the required speed of execution, and the availability of capacity on existing vehicles—to determine the most appropriate and legally sound path for every effort. The intended pathway (e.g., design-only vs. design-build) will be explicitly stated in the Project Opportunity Announcement (POA) for each effort competed within the Alliance.

16. What time, and time zone is the June 1 submission due?
    a. Central Daylight Time (CDT)

17. I have a question about the CMMC requirement. It says we must be Level 2 certified by November 2026 if working on a "Project Level Agreement" and if not, the membership will become inactive and we receive a stop-work order. We are definitely working towards achieving the Level 2 certification, but November is a little sooner than hoped! I'm curious what constitutes a PLA and if there will be discrimination between contracts that require handling CUI and those that don't?
    a. We understand that the path to full certification presents challenges, and we appreciate the opportunity to provide clarity.

       1. Definition of a Project-Level Agreement (PLA)
       To answer your first question, it is essential to understand the two-tiered structure of the AEDC Velocity Alliance:
       - Master Consortium Agreement: This is the base agreement you enter into upon successfully joining the Alliance. It is an unfunded framework that makes you an official member.

       - Project-Level Agreement (PLA): This is any funded project, task, or award that is competed among Alliance members and awarded to a specific member. The PLA is the instrument that obligates funding and directs the execution of a specific scope of work.

       Therefore, the CMMC Level 2 requirement and the November 2026 deadline apply to any member wishing to compete for or perform on any funded work within the Alliance.

       2. Discrimination Between CUI and Non-CUI Projects
       This brings us to your second question. To be direct: The Government does not anticipate that there will be a discrimination between projects that require handling CUI and those that do not, because it is expected that all projects executed under this Alliance will involve CUI.

       Here is the rationale:
       The work of the Alliance is not standard, commercial-style construction. It is the

sustainment, restoration, and modernization of critical national test infrastructure that is directly used to develop next-generation defense systems. Even a seemingly simple project will involve technical drawings, site plans, performance specifications, and other data that, in the context of the overall mission, is considered CUI.

Because the entire portfolio of work is sensitive in nature and directly linked to critical warfighting capabilities, the CMMC Level 2 certification is not treated as a project-specific requirement, but rather as a foundational, enterprise-level security standard for all Alliance members.

This means that to remain eligible to compete for any PLA after the deadline, a member must have achieved the full CMMC Level 2 C3PAO Certification. There will not be a separate category of "non-CUI" projects available for members who have not met the deadline. We encourage you to be detailed and realistic in the CMMC roadmap you provide with your whitepaper submission.

18. Would the government consider allowing vendors to respond to SOO technical evaluation questions with existing work that is currently awarded and in process to allow vendors to provide the most current descriptions of relevant capabilities?
    a. Thank you for your question and your interest in providing the most current representation of your capabilities.

       The direct answer is: No, the Government will not consider responses based on ongoing or incomplete projects.

       Rationale:
       To ensure a fair, objective, and consistent evaluation across all submissions, the Government must adhere strictly to the criteria published in the Request for Whitepapers (RFWP).

       As explicitly stated in Section 5.0, Part 2: Technical Competency Evaluation, under the "Criteria for a 'Pass' Rating":
       - Project Timeliness: The project described was completed within the last five (5) years.

       Furthermore, under the "Criteria for a 'Fail' Rating," a submission will fail if:
       - Non-compliant Project: The project example is older than five years or is not a completed project.

       The requirement for a *completed* project is deliberate. Evaluating technical competency requires assessing not just a vendor's proposed approach or ongoing effort, but their proven ability to successfully execute a project from initiation through final delivery, commissioning, and turnover to the client. An ongoing project cannot fully demonstrate this end-to-end capability or the final achieved quality and schedule performance.

       Therefore, you must select representative projects that have been fully completed within the specified five-year window to be considered responsive to the RFWP.

19. Does the government anticipate that POAs will be posted to a website accessible to all members of the Alliance in good standing (e.g. Procurement Integrated Enterprise Environment (PIEE)) or if POAs will be disseminated via invitation only?
    a. The foundational principle of the AEDC Velocity Alliance is to provide a fair opportunity for all members to compete. Therefore, POAs will not be disseminated on an "invitation-only" or otherwise filtered basis. Every member in good standing will receive every POA issued under the Alliance.

       While the specific delivery mechanism is a procedural detail that will be finalized and communicated to all members upon the official stand-up of the Alliance, we can confirm the process will ensure universal access for all eligible members. The final method may be a dedicated website accessible to all members (such as a PIEE portal) or direct email distribution to the official points of contact for every member in good standing.

       Regardless of the final method used, our process will guarantee that every member of the Alliance has full visibility and a fair opportunity to compete for every project.

20. Being as small as we are, it seems like teaming with a traditional would be necessary on most fronts. Are we encouraged to join as a non-traditional member on our own? Or is it expected for us to join WITH another larger, traditional entity?

    Some of the information in the documents provided led me to think it is almost expected to attach ourselves to a traditional before entry

    Or would we instead be able to team up with larger entities that join the consortium, that we currently do not know?
    a. Answer:
       Thank you for these excellent questions. It is crucial that small businesses understand their vital role in the AEDC Velocity Alliance and the specific requirements for entry.

       Direct Answer:
       You are strongly encouraged to join the Alliance on your own as a prime member. It is not expected or required that you attach yourself to a larger, traditional entity prior to submitting your whitepaper for entry into the consortium.

       However, to join as a prime member, you must demonstrate your ability to partner with *other* innovative entities (an NDC, a nonprofit research institution, or another small business) to satisfy the mandatory entry requirements.

       Here is a detailed explanation of how the Alliance is structured to support your independent entry and future teaming:

       1. Joining the Alliance (The Entry Gate and Part 4 Requirement)
       To join the Alliance as a prime member, you must submit a whitepaper that passes all four parts of the evaluation criteria.

The requirement that often causes confusion is "Part 4: Innovation and Partnership Capability." The purpose of Part 4 is to demonstrate your *capability to form innovative teams*. Therefore, you must identify at least one (1) partner entity with whom you have an existing relationship that is either:

- A Non-Traditional Defense Contractor (NDC)
- A Nonprofit Research Institution
- Another Small Business

You must then describe how that partner could participate to a "significant extent" on a future project, demonstrating how that specific teaming arrangement would satisfy condition (A) or (B) of the statute. This proves to the Government that, as a prime member, you have the proven "reach-back" capability to build compliant teams when it comes time to compete for actual projects.

2. Teaming for Specific Projects (The Competition Phase)
Once you have passed the whitepaper evaluation and are a prime member of the Alliance, the true collaborative power of the consortium begins.

- You Can Form New Teams: The partner you identify in your Part 4 whitepaper response is a demonstration of your capability to form compliant teams. You are absolutely able to team up with larger, traditional entities (or other small businesses/NDCs/nonprofits) that have also joined the consortium—even if you do not know them today—to bid on future projects.
- Dynamic Teaming is Encouraged: The Government expects and encourages dynamic teaming at the project level. For example, you might bid as the prime on a highly specialized Project Opportunity Announcement (POA) and bring on a larger traditional company as a subcontractor to handle scaling requirements. Conversely, a large traditional contractor might bid as the prime on a POA and seek out your specialized small business to perform a critical sub-component of that work.
- The Crucial Requirement: In any teaming arrangement, whether you are the prime or the subcontractor, it is imperative to remember that the Small Business, NDC, or Nonprofit Research Institution must participate to a "significant extent" in the prototype project. This is the core requirement of the OTA authority (10 U.S.C. § 4022). The Government will carefully evaluate every project proposal to ensure this standard is met.

Summary:
Do not feel compelled to attach yourself to a large prime contractor before submitting your whitepaper. If you have the technical skills, meet the security requirements, and can demonstrate your capability to partner with at least one other NDC, nonprofit, or small business, we want you in the Alliance as an independent prime member. Once inside, you will have full visibility on all POAs and the flexibility to form the most competitive, legally compliant teams for each unique project.

21. Are there a minimum number of bids that will be required to sustain membership in the alliance? If so, is there an overall minimum or is it year-to-year?

a. Direct Answer:
No, there is no mandatory minimum number of bids (proposals/whitepapers) required to sustain your membership in the AEDC Velocity Alliance. There is neither an overall minimum nor a year-to-year minimum.

Rationale and Strategy:
The Government recognizes that our industry partners must make strategic business decisions about which Project Opportunity Announcements (POAs) align best with their current capacity, technical strengths, and strategic goals. We do not want to force members to submit proposals/whitepapers for projects where they are not highly competitive just to "check a box."

Our acquisition strategy focuses on creating the opportunity for competition, rather than mandating participation.

By establishing a diverse, pre-qualified pool of vendors and ensuring that every member in Good Standing has full visibility of every POA, the Government satisfies the statutory intent of 10 U.S.C. § 4022(b)(2), which requires that "competitive procedures shall be used when entering into agreements to carry out the prototype projects."

Furthermore, this open and transparent distribution of POAs to the entire consortium satisfies the requirement under 10 U.S.C. § 4022(f)(2)(A), which is a prerequisite for any future, non-competitive follow-on production awards (i.e., proving that "competitive procedures were used for the selection of parties for participation in the transaction").

Your membership remains active as long as you maintain your "Good Standing" status (e.g., maintaining your JCP and CMMC certifications) and adhere to the Base Articles, regardless of how frequently you choose to respond.

22. Does the contract have any bonding requirements?
    a. Terminology: First, it is important to clarify that the agreements awarded under this Alliance (both the master Consortium Agreement and the subsequent Project-Level Agreements) are Other Transaction Agreements (OTAs), not standard FAR-based contracts. Therefore, the standard FAR/Miller Act bonding clauses do not automatically apply.

    The Base Articles: The current Atch 2 - AEDC Velocity Alliance Base Articles do not specify any overarching bonding requirements (such as bid bonds, performance bonds, or payment bonds) as a condition of membership or a general requirement for all projects.

    Project-Level Flexibility: However, as noted in the Request for Whitepapers, the Base Articles are a living document, and specific articles can be tailored or added. Given the significant construction scope involved in many of the Program Objectives (e.g., General Construction, Utilities), the Government explicitly reserves the right to include specific bonding or financial security requirements within individual Project Opportunity Announcements (POAs) when determined necessary and appropriate, making them a material term of the resulting Project-Level Agreements.

In summary, you do not need to secure bonding simply to join the Alliance. Any specific bonding requirements will be clearly identified in the POA and incorporated into specific Project-Level Agreements.

23. Will a white paper be considered responsive/acceptable if only the prime team member has CMMC Level 2 Certification?
    a. Direct Answer:
       Yes, for the purpose of the initial whitepaper submission to join the Alliance, the response will be considered responsive and acceptable if *only the prime member* provides proof of compliance with the mandatory cybersecurity requirements (either full CMMC Level 2 C3PAO Certification or the alternative NIST+Roadmap path).

       Rationale and Future Project Execution:
       - The Entry Gate (Whitepaper Submission): The Government's evaluation of "Part 1: Mandatory Certification Requirements" is focused exclusively on the entity submitting the whitepaper—the prospective prime member of the Alliance. If the prime member meets the criteria, they will pass this gate. We do not require you to provide proof of CMMC compliance for the partner(s) you identify in your "Part 4: Innovation and Partnership Capability" response at this onboarding stage.

       - The Project Gate (Project-Level Agreements): However, it is critical to understand your responsibilities *after* you join the Alliance and begin competing for actual work.
         - As established in Atch 2 - AEDC Velocity Alliance Base Articles (Cybersecurity Requirements, Section E. Sub-agreement Flow-Down Requirements), the cybersecurity requirements are mandatory flow-downs.
         - If you are awarded a Project-Level Agreement (PLA) and you intend to share Controlled Unclassified Information (CUI) or Federal Contract Information (FCI) with your subcontractors or partners, it is your responsibility as the prime member to ensure that those subcontractors possess the appropriate, required CMMC status *prior* to awarding them a sub-agreement.

       In summary: You only need to prove your own (the prime's) compliance to successfully onboard into the consortium. But you must ensure your teaming partners are compliant before sharing sensitive project data with them during the execution of a future PLA.

24. We are preparing our whitepaper response for the AEDC Velocity Alliance RFWP and had a clarification question regarding the 10-page submission limit.

    For vendors pursuing Pathway B (NIST SP 800-171 assessment plus CMMC roadmap), does the required detailed compliance roadmap and associated POA&M count toward the 10-page limit, or may it be provided as an attachment/appendix outside of the page constraint?

We want to ensure we provide the level of detail required for evaluation while remaining compliant with submission requirements.

a. Direct Answer:
   Yes, the CMMC compliance roadmap and any associated POA&M summaries or related documentation absolutely count toward the mandatory ten (10) page limit.

   Rationale and Guidance:
   As explicitly stated in Section 7.0 Submission Schedule and Key Information of the Request for Whitepapers (RFWP): "The total submission must not exceed the ten (10) page limit."

   There are no provisions or exceptions for appendices, attachments, or supplemental documents that fall outside of this strict page constraint.

   The Government's evaluation process is designed to be fair and consistent for all vendors. Allowing some vendors to provide information beyond the page limit would create an unfair competitive advantage. We expect vendors to be clear, concise, and strategic in allocating space within their ten-page whitepaper to adequately address all four mandatory parts of the submission criteria, including the detailed elements required for a credible CMMC roadmap under Pathway B.

25. I have an additional question regarding content in Part 2 of the whitepaper response. My company has a completed project that we will describe in Part 2 that aligns with an Alliance objective, however, we have at least two ongoing (not completed) projects with our proposed team members that demonstrate additional capabilities/services that we could contribute to the Alliance in the future. Would including this information in Part 2 of the whitepaper be recommended or would it risk us being marked as non-responsive?

    a. Direct Answer:
       The Government strongly recommends against including information about ongoing (not completed) projects in your Part 2 response.

       Rationale and Evaluation Rules:
       The primary purpose of Part 2 is to evaluate your firm's proven technical competency and ability to execute a project from start to finish. As explicitly stated in the Request for Whitepapers (RFWP), the Government will evaluate your response based on a representative project completed within the last five (5) years.

       If you choose to include information about ongoing projects:

       - It Will Not Be Evaluated: Evaluators are strictly instructed to assess technical competency based only on the completed project(s) you present that meet the RFWP criteria. Any narrative, claims of capability, or teaming arrangements described in the context of an ongoing or incomplete project will be disregarded during the Part 2 evaluation.

       - It Will Not Make You Non-Responsive (If the Base Requirement is Met): Including ongoing project information will not, by itself, cause your entire

whitepaper to be marked "Fail" or deemed non-responsive—provided that you have also clearly and separately detailed a fully compliant, completed project that successfully passes the Part 2 evaluation criteria.

- It is an Inefficient Use of Space: The most significant risk to your submission is violating the strict 10-page limit. Dedicating valuable page space to ongoing projects that cannot be evaluated for technical competency reduces the space available to provide the detailed, comprehensive narrative required for your compliant completed project(s), your CMMC roadmap (if applicable), and your Part 4 partnership justification.

In summary: To maximize your chances of a successful evaluation, we strongly advise you to focus your Part 2 narrative exclusively on providing a deep, detailed, and compelling case study of a fully completed project that aligns with the Program Objectives and meets all RFWP criteria.

26. If an organization has an "in-process" JCP certification that will not be finalized by the submission deadline, can they still submit a whitepaper?
    a. No, the organization must wait until the next submission deadline.

       Part 1 of the Whitepaper Requirements strictly states that vendors must possess a valid, active JCP certification as a mandatory condition for evaluation.

       Unlike the CMMC requirement, which explicitly outlines an acceptable "alternative path" (a roadmap to November 2026), there is no provision or waiver for an "in-process" JCP certification.

27. Can an organization submit a whitepaper using the active JCP certification of a separate business unit or sister company?
    a. No, JCP certifications cannot be shared or borrowed across different legal entities.

       JCP certifications are issued to specific legal entities and are tied strictly to an organization's unique Commercial and Government Entity (CAGE) code.

       The entity that submits the whitepaper and executes the Other Transaction (OT) Agreement must be the exact entity that holds the valid JCP certification and the requisite cybersecurity credentials.

       The business unit holding the active JCP certification must act as the prime vendor submitting the whitepaper (provided they also independently meet the mandatory CMMC Level 2 requirements or alternative roadmap). The parent or sister company could then potentially act as a partner or subcontractor under that prime submission.

28. What are the requirements for the company representative that attends?
    a. There are no specific military rank or security clearance requirements for the representative. However, the following logistical and professional guidelines apply:

- Location/Access: Because the Industry Day is being held at the UTSI Auditorium (an off-base facility), no formal military base visitor pass, DBIDS registration, or base-specific vetting is required for this venue.

- Professional Representation: Per Section 6.0 of the RFWP, vendors must send "appropriate personnel." It is highly recommended that your representative is an authorized official who is legally permitted to represent the company, can speak to technical competencies (per Atch 1), and understands the agreement obligations associated with the Base Articles (per Atch 2).

- Logistics: Attendees should refer to Atch 5 - UTSI Map for specific parking and entrance instructions to the auditorium.

29. If our whitepaper is submitted prior to June 1, is it possible for the site visit to be performed during the Opportunity 2 window?
    a. No. The onboarding process is structured into distinct, linear phases. Per the "Onboarding Schedule" in Section 7.0:

        - Opportunity 1: Submissions due by June 1, 2026, are tied exclusively to the mandatory Industry Day on June 17, 2026.

        - Opportunity 2: Submissions due by September 1, 2026, are tied to the September site visit window.

        The government evaluates each "Opportunity" as a standalone cohort. You cannot mix the submission deadline of one opportunity with the site visit window of another.

30. If the June site visit cannot be attended, should the whitepaper be submitted after June 1 for Opp 2?
    a. Yes. Attendance at the Industry Day (for Opportunity 1) or the Site Visit (for Opportunity 2) is a mandatory, non-negotiable requirement for onboarding.

        - If your company cannot support the June 17 date, you should withhold your submission until the Opportunity 2 window (opening after June 1, with a deadline of September 1, 2026).

        - Submitting for Opportunity 1 without the ability to attend the June 17 event will result in your whitepaper being disqualified as "non-responsive," as you will be unable to complete the mandatory Step 4 of the evaluation process.

31. A vendor is evaluating an upcoming onboarding opportunity and needs to make a near-term business decision regarding the investment required for a CMMC Level 2 gap analysis and certification roadmap.
    The vendor is prepared to pursue CMMC Level 2 C3PAO certification and submit under the alternative compliance path with a roadmap explicitly targeting the November 2026 deadline.

However, final certification timing can depend on external factors like C3PAO availability, assessment scheduling, and Government validation timing.

Specifically, if a vendor is accepted into the AEDC Velocity Alliance based on a compliant NIST/SPRS assessment and CMMC Level 2 roadmap, but full CMMC Level 2 C3PAO certification is not achieved until after November 2026, would the Government:

- Place the vendor's membership in inactive status and restrict them from competing for or receiving Project-Level Agreements until certification is achieved; or

- Terminate the vendor's Membership Agreement/default the member for failure to maintain Good Standing?

Stated another way, is missing the November 2026 certification date treated as a temporary eligibility issue that can be cured by later certification, or as a basis for termination of the consortium membership agreement?

This clarification is important because Question 17 on the 22 May Q&A document seems to conflict slightly with Question 9. Question 9 is about roadmap dates, while Question 17 is about the late delivery of the certification despite having submitted a compliant roadmap.

a. This is a critical point of clarification. Missing the November 2026 certification deadline is treated as a temporary eligibility issue that results in an inactive membership status. It is not an immediate basis for termination, and the inactive status can be cured by achieving the required certification at a later date.

   There is no conflict between Q&A #9 and Q&A #17; they address two distinct, sequential phases of the Alliance lifecycle:

   - The Submission Requirement (Q&A #9): This addresses the initial whitepaper submission (the entry gate). A whitepaper is deemed non-responsive if the roadmap *plans* for a certification date after November 2026. The roadmap itself must target the deadline for the vendor to be accepted into the Alliance.

   - Post-Acceptance Performance (Q&A #17 & Base Articles): This addresses what happens if a member, who was accepted with a compliant roadmap, fails to *achieve* certification by the November deadline due to execution delays.

   The consequences for post-acceptance delays are explicitly defined in the Request for Whitepaper (RWP) and the Base Articles:

   - Inactive Status (RWP): Section 6.0 of the RWP ("Statement of Understanding") states: *"Failure to meet this deadline will result in the vendor's Membership Agreement becoming inactive, and they will no longer be eligible to compete for new project awards until certification is achieved."*

   - Conditional Status (Base Articles): This mechanism is further governed by the Base Articles (Atch 2) under the "Article: Membership and Good Standing." This article establishes a "Conditional Status" framework, which provides the

Government the agreement authority to place members who experience compliance lapses into a restricted status, rather than immediately issuing a termination for default.

- Path to Cure: The word "until" in the RWP, combined with the Conditional Status framework in the Base Articles, explicitly confirms that the inactive period is temporary. Once a member provides proof of full, validated CMMC Level 2 C3PAO certification, their membership is restored to active status ("Good Standing"), and eligibility to compete for future projects is reinstated.

This framework enforces the security deadline by restricting new CUI-related work to fully certified members, while simultaneously providing a path for capable vendors who have acted in good faith to cure a compliance lapse and return to "Good Standing."

32. Place of performance — remote vs. on-site. Amendment 2 identifies the performance sites (Arnold AFB, Holloman AFB, Tunnel 9, and NFAC Moffett Field), but I did not find guidance on whether any portion of project work may be performed remotely. For project types involving engineering, design, or documentation, is remote performance permissible, or is on-site presence expected for all work? I understand this may ultimately be defined at the individual Project Opportunity Announcement level, and any general guidance would be helpful for planning.
    a. This is an excellent question for planning purposes. While the ultimate determination will be made at the individual Project Opportunity Announcement (POA) level, the governing documents provide clear guidance on the Government's expectations and framework.

    Direct Answer:

    Yes, it is anticipated that a significant portion of the engineering, design, and documentation work may be performed remotely. The Alliance framework does not mandate a continuous on-site presence for all tasks. However, all remote work is contingent upon the vendor's strict adherence to the mandatory cybersecurity requirements for protecting Controlled Unclassified Information (CUI).

    Detailed Rationale:
    Framework Focuses on CUI Protection, Not Location: The "Base Articles" and "Request for Whitepaper" place heavy emphasis on a vendor's ability to secure CUI. The entire CMMC certification requirement is built around ensuring that your company's information systems—wherever they are located—are compliant. The answer to Q&A #8 in the public Q&A document reinforces this, stating that vendors are expected to handle the electronic transmission of CUI using their own compliant systems. This inherently supports the concept of performing sensitive design and documentation work off-site.

    Nature of the Work: The Alliance scope includes service-based engineering and design efforts (e.g., Mechanical Engineering Services, ID&C Engineering Services) that are naturally suited for a hybrid performance model. While the result of the work is for a specific physical site, the process of creating designs, drawings, and plans can often be done remotely.

Project-Specific Determination: As you correctly noted, the definitive requirements will be established in each Project Opportunity Announcement (POA). The Government will tailor the place of performance requirements based on the specific needs of each project.

- A project involving hands-on equipment assessments or installation will naturally require more on-site presence.

- A "design-only" project may allow for a significant degree of remote work, supplemented by on-site visits for meetings, site surveys, and final validation.

Expectation of CUI on All Projects: As clarified in Q&A #17, vendors should expect that all projects under this Alliance will involve CUI due to the sensitive nature of the work. Therefore, your ability to securely handle CUI remotely is a foundational capability for successful participation in the Alliance, regardless of the specific project.

In summary, you should plan for a hybrid approach. While you will not be required to have staff on-site at all times for all projects, you must have a robust, CMMC-compliant infrastructure that enables secure remote work on CUI. The specific balance between remote and on-site work will be explicitly defined in each future POA.

33. Opportunity 2 mandatory site visit — specific date. The Onboarding Schedule lists the Opportunity 2 site visit as a window (1–30 September 2026), whereas Amendment 2 established a fixed date for the Opportunity 1 Industry Day (17 June 2026). Will a specific date for the Opportunity 2 site visit be established in a future amendment, and if so, is an anticipated date available? We are coordinating around other September commitments and would benefit from confirming the date as early as possible.
    a. Yes, a specific date for the Opportunity 2 site visit will be established. However, an exact anticipated date is not available at this time.

       Detailed Rationale:
       Consistent with the flexible onboarding framework of the AEDC Velocity Alliance, the Government may establish and publish the exact date and logistical details for the Opportunity 2 site visit via a future formal amendment to the solicitation. Alternatively, the Government reserves the right to communicate the specific date and time directly and exclusively to those vendors whose whitepapers have been successfully evaluated and vetted.

       At this time, vendors planning for Opportunity 2 should prepare for the site visit to occur within the established window of 1–30 September 2026. The Government will finalize the exact date as project planning matures and facility/personnel availability is confirmed.

       Vendors are advised to monitor the solicitation posting for future amendments while also preparing for potential direct communication should they advance through the initial whitepaper evaluation phase.

34. Will signing of the membership agreement occur onsite at the mandatory site visit / Industry Day?

a. No, the signing of the membership agreement will not occur onsite during the mandatory site visits or Industry Days.

   Rationale:
   To maximize the value of your time onsite, these onboarding events will be strictly focused on technical briefings, networking, partnership building, and direct Q&A.

   As established in the onboarding process, participation in the mandatory site visit is a prerequisite for final onboarding. Therefore, the formal execution of the membership agreement will be handled electronically following successful attendance at the respective event.

   After the conclusion of the site visit, prime contractors will be sent the final agreement package electronically for signature. This process will streamline the administrative workload and ensure a faster, more secure onboarding completion for all parties.

35. We saw that there is an industry day site visit for June 17th. Is this solely for the accepted consortium members or is it available for anyone? I wasn't able to find registration anywhere or if sign-up is required. We would love to send our team to get a better understanding of the program if it is open.
    a. No, the mandatory site visits and Industry Days are not open to the general public, nor are they open to vendors who have not successfully completed the initial evaluation phase. There is no open public registration for these events.

       Rationale:
       While updates regarding these events (such as Amendment 2) are posted publicly to SAM.gov, attendance is strictly invitation-only. To be eligible to attend any AEDC Velocity Alliance site visit or Industry Day, a vendor must first follow all instructions provided in the Request for Whitepaper (RWP), submit their whitepaper by the specified opportunity deadline, and have their submission successfully evaluated and determined to be acceptable by the Government.

       Only vendors who have been successfully vetted through this Step 1 evaluation process are provided with registration instructions and authorized to attend.

       Because these events often involve Export-Controlled information and strict security protocols (such as verified JCP certifications), any vendor or individual who has not been formally vetted and invited will not be permitted entry and will be turned away at the door.

       If your company is interested in joining the consortium and attending a future event, we highly encourage you to review the RWP and submit a whitepaper for the next available Onboarding Opportunity (e.g., Opportunity 2).

36. Is a "large business" vendor eligible for the AEDC Velocity Alliance if their NAICS code is 541330 and their "small business" partner has a 236220 NAICS code with recent DoW project

experience (assuming they also "pass" all parts of the Government's evaluation based on mandatory certifications and technical merit)?

a. Yes, the proposed teaming arrangement is fully eligible. Depending on the verified Cost Accounting Standards (CAS) status of the Large Business prime, this arrangement can successfully satisfy either Condition (A) or Condition (B) of the partnership requirements.

   How the Teaming Arrangement Meets the Requirements:
   To be eligible for the Alliance, a teaming arrangement must satisfy one of two conditions under the partnership rules. In your scenario, the team can be structured to meet either pathway:

   Pathway 1: Satisfying Condition (A)
   This pathway applies if your Large Business prime is a traditional defense contractor (meaning it currently performs or has performed fully CAS-covered DoD contracts of $50M+ in the past year).

   - The Requirement: Condition (A) is met if the team includes at least one Non-Traditional Defense Contractor (NDC) that participates to a significant extent.
   - How You Comply: Your Small Business partner is explicitly exempt from CAS requirements per 48 CFR § 9903.201-1(b)(3), making them an NDC by default. As long as this partner is verified as an NDC and plays a significant role in the project, Condition (A) is fully satisfied.

   Pathway 2: Satisfying Condition (B)
   This pathway applies if your Large Business prime qualifies as an NDC.

   - The Requirement: Condition (B) is met if *all* significant participants on the team are Small Businesses or NDCs.
   - How You Comply: Under 10 U.S.C. § 3014, any business—regardless of size—is classified as an NDC if it has not performed a fully CAS-covered DoD contract ($50M+) in the preceding year. If your Large Business prime meets this criteria, the prime itself is an NDC. Combined with your Small Business partner (who is also an NDC), every significant participant on your team is an NDC, fully satisfying Condition (B).

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