Justification Review Document for Other Than Full and Open Competition, Brand Name
W50S83-26-B-0001
8 April 2026
FKNN159044 Construct Tanker Fuel Cell

Program/Equipment:	Section 087100-Locks MFG: Sargent Manufacturing Company
Authority:	IAW FAR 6.302-1(c)
Amount:	$[redacted]

Program/Equipment:	Section 230900-Direct Digital Controls MFG: Honeywell Building/Tridium Niagara-AX
Authority:	IAW FAR 6.302-1(c)
Amount:	$[redacted]

Program/Equipment:	Section 095100-Acoustical Ceiling Tiles, Ultima High-NRC Square Lay-in MFG: Armstrong World Industries, Inc.
Authority:	IAW FAR 6.302-1(c)
Amount:	$[redacted]

Program/Equipment:	Section 283176-Digital, Addressable Fire Alarm System MFG: Monaco Fire Alarm Systems
Authority:	IAW FAR 6.302-1(c)
Amount:	$[redacted]

Program/Equipment:	Section 099000-Paint MFG: Sherwin Williams or approved equal
Authority:	IAW FAR 6.302-1(c)
Amount:	$[redacted]

Prepared by:

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Technical Representative:

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Contracting Officer:

[redacted]

Justification and Approval for Other Than Full and Open Competition, Brand Name
FKNN159044 Construct Tanker Fuel Cell (Cont.)

1. **Contracting Activity:** USPFO for ME, Purchasing and Contracting

2. **Description of Action:** The requirement is a new contract, awarded as a firm-fixed price contract using MILCON funds.

3. **Description of Supplies/Services:**

Locks – Sargent Manufacturing Company - [redacted] - To maintain the security, operational integrity, and master keying structure of the Bangor and South Portland Air National Guard Bases, all new and replacement locks must be compatible with the installation's established proprietary keying system. This requires the procurement of Sargent-manufactured lock hardware prepped to accept the Sargent-specific large format interchangeable core (I-Core), as no other manufacturer's product can meet the required mechanical and systemic characteristics.

The core of this requirement lies in the base's master key system, which is built upon an extensive and proprietary "bitting list" developed exclusively between the Maine Air National Guard and Sargent. This list defines thousands of unique key combinations and multiple levels of master keys, culminating in a single Grand Master Key used by emergency services (Base Fire Department, Security Forces) for critical life-safety access to every facility. The physical manifestation of this system is the Sargent large format I-Core and its corresponding unique key blank.

While the term "interchangeable core" (IC) is common in the industry, it is not a universal standard. The industry is dominated by two mechanically distinct and non-interchangeable formats: Small Format Interchangeable Cores (SFIC), which are cross-compatible among several brands, and various proprietary large format cores, such as the Sargent I-Core. The Sargent I-Core has unique physical dimensions, a different control lug position, and a distinct keyway that will not physically fit into the lock hardware of other manufacturers (e.g., Schlage, Corbin Russwin), nor will other brands' cores fit into Sargent hardware.

Critically, even if a physical fit were possible, no other manufacturer has access to the proprietary Sargent bitting list or the capability to cut keys and pin cores to match this established system. Deviating from the Sargent system would immediately invalidate the Grand Master Key, creating a security and life-safety crisis. It would necessitate carrying multiple, separate master keys for different facilities, creating confusion and dangerous delays for first responders during an emergency. Furthermore, it would require establishing and maintaining a completely separate keying system, including new bitting lists, pinning kits, and core inventories, which is logistically unsupportable and not cost-effective.

Therefore, to ensure 100% mechanical compatibility and maintain the integrity of the single, unified master key system essential for base security and emergency response, all locks and cores must conform to the established Sargent I-Core platform and its proprietary keying structure. This approach also allows maintenance technicians to maintain a high level of expertise on a single system, ensuring vital time is saved when restoring locks and doors to a fully mission-capable status. All products shall be supplied in accordance with the Buy American Act.

Direct Digital Control System – Tridium Niagara/BACnet - [redacted] – In accordance with the Base Standardization Program for the Bangor and South Portland Air National Guard Bases, all Direct Digital Control (DDC) systems and components purchased for new facilities, replacements, and future renovations shall be built upon the Tridium Niagara framework and utilize the open standard BACnet protocol. This platform-based standardization is the cornerstone of the base's energy management strategy, ensuring interoperability, operational efficiency, and long-term cost savings.

The entire existing DDC infrastructure across the bases is standardized on the Niagara framework. Mandating its continued use is essential for any new system to integrate seamlessly into our existing, unified network. This ensures that all facilities can be monitored and controlled from a single, familiar interface, providing a "single pane of glass" for our energy managers and maintenance technicians. This approach guarantees that new controllers and devices are immediately compatible with the established architecture, eliminating the significant risks, costs, and time associated with trying to integrate disparate, proprietary control systems.

By specifying a widely adopted open framework rather than a single brand, we foster a competitive procurement environment. Multiple major manufacturers, such as Honeywell, Schneider Electric, and Eaton, build

products on the Niagara platform, allowing the government to solicit competitive bids from qualified vendors while still meeting our critical technical requirements.

Furthermore, this standardization provides significant maintenance and training benefits. Our technicians are trained and proficient on the Tridium Niagara framework itself, enabling them to effectively troubleshoot and manage the system regardless of the specific hardware manufacturer. This leads to greater technician expertise and saves vital time when restoring equipment to fully mission capable status. While specific hardware parts may vary, the core software, programming, and user interface remain consistent, which simplifies both high-level maintenance and the logistics of technical support.

Acoustical Ceiling Tiles – Armstrong World Systems or equal-[redacted] – To ensure operational efficiency and a uniform standard of quality and appearance across the entire installation, it is imperative to standardize the acoustical ceiling tiles to a single manufacturer and model: the Armstrong World Systems Ultima High-NRC Square Lay-in. This specific tile is already installed in every facility within the Maine Air National Guard, establishing a clear precedent for its use. Adopting this single standard mirrors a well-established best business practice within commercial property management, where such uniformity is key to maximizing efficiency and controlling long-term costs. By procuring only this tile, we eliminate the logistical and financial burdens of managing multiple, incompatible brands. This single-source approach streamlines inventory for maintenance, simplifies replacement procedures, and guarantees a consistent visual and acoustical environment across all buildings, thereby minimizing lifecycle costs and upholding a professional standard throughout the base.

Fire Alarm Panel – Monaco Enterprises, Inc. -[redacted] – In accordance with the Base Standardization Program, all fire alarm systems and components purchased and installed for new facilities, replacements, and future renovations at the Bangor and South Portland Air National Guard Bases shall be manufactured by Monaco Enterprises, Inc. This sole-source requirement is essential for maintaining the operational integrity of the base-wide life safety network and ensuring compatibility with existing mission-critical infrastructure.

The existing fire alarm infrastructure across the installation is a completely integrated network of Monaco control panels and devices. These components communicate with each other and report to a central monitoring station using a proprietary digital protocol unique to Monaco. No other manufacturer's equipment can interpret or transmit on this proprietary network. Attempting to introduce a third-party product would fail, compromising the integrity of the entire life-safety system and creating an unacceptable risk. Therefore, for any new or replacement equipment to function, it is a technical necessity that it be Monaco branded. This directly addresses the requirement for the purchase of equipment where compatibility is essential for the integrity of results.

This standardization provides significant operational and financial benefits. Base maintenance technicians are extensively trained and certified on Monaco systems. Sticking with a single manufacturer leverages this existing expertise, allowing technicians to restore life-safety equipment to fully mission-capable status with maximum speed and efficiency. Procuring another brand would require cost-prohibitive retraining and would introduce a learning curve on equipment that tolerates no errors.

Furthermore, our logistics and supply chain are streamlined to support only Monaco products, with a dedicated inventory of repair parts currently stocked. It is not financially feasible to expand this inventory to support multiple manufacturers. A key salient characteristic of this standardization is the support model: technical support and replacement parts are sourced directly from the manufacturer, Monaco Enterprises, Inc. This eliminates delays and added costs associated with second-party contractors, saving significant time and money when troubleshooting critical life-safety issues.

Paint – Sherwin Williams or equal [redacted] - To ensure architectural consistency, simplify maintenance, and control long-term costs across all facilities, a standardized palette of paint colors and performance characteristics is required for all new construction, renovations, and maintenance painting. This standardization establishes a uniform aesthetic and allows for the efficient use of materials and labor.

While the specific brand of paint is not restricted, all paint must meet the quality and durability standards of the specified Sherwin-Williams products, which serve as the basis of design. Furthermore, all colors must be an exact match to the corresponding Sherwin-Williams color codes listed below. The burden of proof for color accuracy and "or equal" product quality lies with the vendor.

This standardization directly reduces costs by minimizing inventory. Instead of stocking numerous paint colors and sheens for touch-ups, maintenance personnel will manage a small, known palette, reducing waste and ensuring repairs are visually seamless. This consistent appearance is critical for maintaining a professional and cohesive

environment across the installation.

Required Salient Characteristics:

- Interior Paint: Must be a commercial-grade, low-VOC latex paint with an eggshell finish, equal or superior to Sherwin-Williams ProMar 200. Colors must be an exact match to:
  - SW 6119 Antique White
  - SW 7044 Amazing Gray
  - SW 6150 Universal Khaki
  - SW 6504 Sky High
  - SW 6176 Liveable Green
- Exterior Paint: Must be a high-performance exterior acrylic latex paint with a flat finish, equal or superior to Sherwin-Williams Super Paint Exterior. Colors must be an exact match to:
  - Soffits/Fascias: SW 7516 Kestrel White
  - Building Walls: SW 7704 Tower Tan
  - Building Lettering: SW 7520 Plantation Brown

4. **Authority Cited:** 10 United States Code 2304(c)(1) as implemented in Federal Acquisition Regulation 6.302-1(c), Only one responsible source and no other supplies or services will satisfy agency requirements - Application for brand name descriptions.

5. **Reason for Authority Cited:** This action requires the use of the authority 10 U.S.C. 3204(a)(1) as implemented by FAR 6.302-1. The rationale for each brand name item is detailed below:

Sargent Locks and Monaco Fire Alarm Systems: These items are required to be from a specific manufacturer to ensure compatibility with existing, proprietary systems installed across the base. The Sargent master key system relies on a proprietary bitting list and keyway, and the Monaco fire alarm network uses a proprietary communication protocol. No other manufacturer's products can integrate with these existing systems. Procuring an alternative would compromise base security and life-safety, and would require a complete, cost-prohibitive replacement of the entire base-wide infrastructure, leading to substantial duplication of cost and unacceptable delays.

Tridium Niagara/BACnet Direct Digital Controls: These controls are specified to maintain standardization with the base's established energy management control system. While Tridium Niagara is a brand name framework, it is an open platform supported by multiple equipment manufacturers. Specifying this framework ensures interoperability and leverages extensive government investment in technician training and existing infrastructure, while still allowing for competition among vendors who build products on this platform.

Armstrong Ceiling Tiles and Sherwin Williams Paint ("Or Equal"): These items are specified as a "brand name or equal" basis of design to ensure architectural, aesthetic, and performance consistency across all base facilities. This standardization simplifies maintenance, reduces inventory and long-term costs, and ensures a professional and uniform appearance. The specifications allow for any manufacturer's product that is certified as "equal" in quality, color, and performance.

6. **Efforts to Obtain Competition:**

This acquisition strategy ensures robust competition through a two-tiered approach. While the requirement specifies items from a single manufacturer, these products are commercially available from numerous independent suppliers and distributors.

- *Effective competition.* This creates effective competition at the supplier level. Prime contractors will solicit quotes from these multiple competing suppliers, which compels them to offer their best terms on price and delivery to win the business.
- *Subcontracting competition.* This process fosters subcontracting competition. Prime contractors are incentivized to seek bids from multiple subcontractors, who in turn leverage their own distinct supplier relationships to achieve the most favorable pricing. This downstream competition is passed up to the prime bids, directly benefiting the Government by ensuring the final awarded price is fair, reasonable, and arrived at through a competitive process.

7. **Actions to Increase Competition:** Competition among distributors and suppliers for each identified brand is

expected. The degree of competition will vary, as it is dependent upon the success of potential prime contractors in locating qualified suppliers. The 101st ARW's use of a Base standard for these items helps to limit the government's bench stock costs. Having multiple suppliers for these standardized items will further this cost-conscious approach by fostering a competitive environment, which in turn drives down prices and ensures a stable, resilient supply chain.

8. **Market Research:** Market research was conducted from September 2025 through October 2025 in accordance with FAR Part 10 to determine the availability of commercial items and the interest of qualified sources. The research concluded that a competitive environment exists for this construction requirement at the prime contractor level. The following methods were used:
    - Sources Sought Notice: A notice (ID: W50S83-25-SourcesSought01) was posted to SAM.gov on 12 September 2025, with a closing date of 22 September 2025. The notice publicized the requirement to a wide audience of potential competitors.
    - Review of Government Databases: A search of the Dynamic Small Business Search (DSBS) database was conducted on 26 September 2025 for firms under NAICS code 236220, which identified a sufficient number of potential small business contractors in the local area.
    - Historical Acquisition Review: A review of recent, similar construction projects awarded by the 101st ANG confirmed that multiple competitive bids are typically received for projects of this nature.

Based on this research, the acquisition strategy is to proceed with a 100% Small Business Set-Aside.

9. **Interested Sources:** In response to the Sources Sought notice published on SAM.gov, the following six (6) firms provided written statements expressing their positive intent to submit a proposal as a prime contractor for this project:
    - Blane Casey
    - Cianbro
    - CVJV (Criterium-Valentine, A Joint Venture)
    - Excell
    - Nickerson & O'Day, Inc.
    - Phelan Construction, LLC

    This list of interested sources confirms a competitive environment at the prime contractor level. These prime contractors are responsible for procuring all materials, including the brand name items specified in this justification, from numerous independent suppliers and distributors. This ensures effective competition is achieved at the supplier and subcontractor tier.

10. **Other Facts:** N/A

11. **Technical Certification:**

    I certify that the supporting data under my cognizance, which are included in the justification are accurate and complete to the best of my knowledge and belief.

[redacted]

12. Requirements Certification:

I certify that the supporting data under my cognizance, which are included in the justification are accurate and complete to the best of my knowledge and belief.

[redacted]

13. Fair and Reasonable Price Determination:

I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable. These brand name items are available from multiple suppliers. The competitive process will result in prices being fair and reasonable.

[redacted]

14. Contracting Officer Certification:

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

[redacted]