JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION FOR NON-NSN AND LSN ACQUISITIONS

1. Agency: Defense Logistics Agency Contracting Activity: VICA

Document Identification Number: IPE Tracking # 25-25-1008 Solicitation Number: EBS PR 7014303796

☐ FAR Part 15 ☑ FAR Part 12 ☑ FAR Part 13.5

2. The action being approved is the acquisition of supplies/services on other than a full and open competition for Non-NSN and LSN acquisitions.

☑ New Action ☐ Amendment: _____

3. The supplies/services required to meet the using activity's needs are described as follows:

BRIEF DESCRIPTION	P/N / LSN	QUANTITY	ESTIMATED VALUE
DMG Mori KBT-11EZ Horizontal Boring Mill with turnkey services:	3411-N00002905	1	[redacted]
Foundation, Installation, IUID tag, Shipping, Post Processor, tooling			
OSHA certification, training, and technical data (e.g. manuals, drawings)			

DETAILED DESCRIPTION

The Navy's Trident Refit Facility at Kings Bay, GA requires a KBT-11EZ model Computer Numerically Controlled (CNC) Horizontal Boring Mill (HBM) from the original equipment manufacturer (OEM) DMG Mori. The HBMs are used for precision metal cutting used for manufacturing classified nuclear and non-nuclear components in providing maintenance support for the Navy's fleet. To utilize a CNC HBM, a manufacturing program is created for machine's cutting head to precisely move to and cut the part to desired critical dimensions making it naval combat worthy.

4. The statutory authority permitting other than full and open competition is 10 U.S.C. 3204(a)(1) – Available from only one or limited number of sources.

5. The acquisition is restricted to the only source(s) of supply known to have the capability of furnishing the required supplies/ services. Source(s) are:

CAGE	COMPANY NAME
96XT6	DMG Mori Federal Services

The use of authority 10 U.S.C. 3204(a)(1) is based on:

10 U.S.C. 2304 (c) (1), as implemented by FAR 6.302-1; only one responsible source and no other supplies or services will satisfy agency requirements. The DMG Mori Computerized Numerical Controlled (CNC) Horizontal Boring Mills (HBM) are precision metal cutting machines used for manufacturing classified nuclear and non-nuclear components for repairing the Navy's fleet. Currently the eight (8) Regional Maintenance Centers (RMC's), Trident Refit Facility Kings Bay (TRFKB), Readiness Support Group Groton (RSG), Norfolk Naval Shipyard (NNSY), Portsmouth Naval Shipyard (PNSY), Puget Sound Naval Shipyard (PSNSY), and Pearl Harbor Naval Shipyard (PHNSY) are staffed with sailors and civilians. This will be referred to as the Enterprise throughout.

The Enterprise currently owns 5 DMG Mori CNC HBM's. The enterprise currently has 2500 programs specific to the DMG Mori CNC HBM's that have been developed, tested and proven to manufacture and repair ship components efficiently. The programs use geometry (G) and modal (M) codes that are proprietary to DMG Mori. The programs combine the proprietary G and M codes with numeric values, so that the CNC HBM machine moves to precise locations or rotates at defined Revolutions per Minute (RPM). By procuring the next HBM as the DMG Mori Model # KBT-11EZ, the Enterprise can avoid duplication of cost from having to reprogram the 2500 automate parts manufacturing program library. This equates to a cost avoidance of [redacted] which will not be recovered through competition. See Section 9 of this document for the cost calculations.

6. Efforts to ensure that offers are solicited from as many sources as practicable are:

☑ The acquisition will be synopsized on or about 11/15/2025 and any firm requesting a solicitation copy will be provided one.

☐ A synopsis exception cited in FAR 5.202 applies: (Explain)

CONTROLLED BY: Defense Logistics Agency (DLA)
CONTROLLED BY: DLA Weapons Systems (Richmond)
CUI CATEGORY: SSEL
DISTRIBUTION/DISSEMINATION CONTROL: FEDONLY
POC: [redacted]

☐ Manufacturers of similar products identified in the market survey will be solicited.
☑ Dealers of the manufacturers will be solicited.
☐ Other: (Explain)

7. I hereby determine that the anticipated cost to the Government will be fair and reasonable. (Explain)

The award will be evaluated using a comparison of historically awarded contract prices found fair and reasonable or limited cost and pricing information obtained from the vendor. If limited cost and pricing information is obtained the Government's objective may be developed through the use of direct and indirect rates recommended by DCAA and/or DCMA. The Contracting Officer at DLA Aviation VICA-IPE will determine that the price negotiated for this acquisition is fair and reasonable pursuant to Part 12 and 13.5

8. A market survey as defined by FAR 10:

☑ was conducted, and firms indicating an interest in the acquisition will be solicited. Market research efforts, include:

A sources sought was posted on SAM.gov for this requirement, running from 04-11 August 2025. 4 Responses were received: DMG Mori (the OEM)(96XT6), Trophy Sports Center (8V9E0), Open X Education (8EG29), and GovSmart (5WFZ8). All responses provided provide budgetary estimate. The submission were near identical with shipping charges varying based on location of contractor. DMG Mori rep, Kevin Pasiola (Business Operations Associate) was contacted regarding confirmation of the authenticity of the other submission as the had identical DMG Mori information. Mr. Pasiola explained the submission came from DMG Mori SMALL BUSINESS partners should this solicitation be a SBSA. It is not possible to do SBSA on this procurement, so only DMG Mori would be submitting a proposal.

☐ was not conducted due to the unusual and compelling urgency of the requirement.
☐ was not conducted due to:

9. Additional facts supporting other than full and open competition are:

☐ Based upon the technical certification on file, technical data is not available and cannot be developed to permit full and open competition. The data presently available reflects the minimum needs of the Government.
☑ When FAR 6.302-1 is cited for substantial duplication of costs in the case of a follow-on acquisition as described in 6.302-1(a)(2)(ii)(A), an estimate of the cost to the Government that would be duplicated and how the estimate was derived:

By procuring DMG Mori CNC HBM's the Enterprise will recognize a total programming cost savings of [redacted] as follows:

The programs use geometry (G) and modal (M) codes that are proprietary to DMG Mori. The programs combine the proprietary G and M codes with numeric values, so that the CNC HBM machine moves to precise locations or rotates at defined Revolutions per Minute (RPM). To use an alternate OEM's HBM, each program would need to be reprogrammed on the new machine, with a total of 2500 programs to re-code. Each program takes 36 labor hours to recode at a technician billable rate of [redacted]. This results as:

36 hours x 2500 Programs x [redacted]

This entire cost is duplicative as these programs already exist and the cost to duplicate would not be recovered through competition.

☐ When FAR 6.302-1 is cited for unacceptable delays in the case of a follow-on acquisition as described in 6.302-1(a)(2)(ii)(B), describe the unacceptable delays:

☐ Other:

10. A listing of sources, if any, indicating an interest in writing in the acquisition are: (if none, state none)

CAGE	COMPANY NAME
96XT6	DMG Mori Federal Services
8EG29	OPEN X EDUCATION, INC
5WFZ8	GOVSMART, INC
8V9E0	Trophy Sports Center, LLC

11. The actions, being taken to overcome barriers to competition before any subsequent acquisition are made: (Explain)

Any future procurement will be evaluated to determine if competition is in the best interest of the Government.

APPROVAL

APPROVAL LEVELS OF THE JUSTIFICATION – FAR 6.304

☐ not exceeding $900,000… .....Contracting Officer
☑ over $900,000 not exceeding $20,000,000… ..... Competition Advocate

TECHNICAL/REQUIREMENTS PERSONNEL CERTIFICATION – FAR 6.303-2(c)

Supporting data that is the responsibility of technical or requirements personnel and which form the basis for this justification have been certified as complete and accurate by the cognizant technical/requirements Personnel. Signature of technical/requirements personnel is not required.

CONTRACTING OFFICER – FAR 6.303-2(b)(12)

I hereby certify that the information contained in this justification is accurate and complete to the best of my knowledge and belief. If not exceeding $900,000, this signature serves as the approval.

Richard D. Alexander, Jr.	Digitally signed by ALEXANDER.RICHARD.DEAN.JR. [redacted] Date: 2025.11.06 09:29:50 -05'00'	[redacted]	20251106
Name and Title	Signature	Phone	Date

COMPETITION ADVOCATE – FAR 6.304(a)(2)

The Competition Advocate for the procuring activity designated pursuant to FAR 6.501 has reviewed and approved this Justification for a proposed contract over $900,000 but not exceeding $20 million.

Yolanda C. Maupin	MAUPIN.YOLANDA.C[redacted] Digitally signed by MAUPIN.YOLANDA.C[redacted] Date: 2025.11.06 10:00:57 -05'00'	[redacted]	11.6.25
Name and Title	Signature	Phone	Date