Brand-Name Justification & Approval

As a legislative branch agency, the Library is subject to the competition and advertising requirements of 41 U.S.C. § 6101. Like the Competition in Contracting Act and the FAR, 41 U.S.C. § 6101 does not require competition when a contracting officer certifies that only one source or brand-name item is available, when dictated by public exigency, or when otherwise authorized by law.

This document sets forth the justification and approval for award of a contract or order by means providing for other than full and open competition per 41 U.S.C. § 6101, LCR 7-210, and, as applicable, FAR 6.302, FAR 13.106-1, FAR 8.405, and FAR 16.505. Contracting without competition shall not be justified on the basis of a lack of advance planning or concerns related to availability of funds.

This form shall be used to support instances where competition will be limited to a single source, a limited number of sources, including where a brand name product is required.

Part 1 – Identification

1. Contracting Agency and Activity: Library of Congress, LCSG/RCS/NAVCC/VPL

2. Nature of Action Being Approved

☒ Contract (or modification)
☐ LoC or Leg Branch Order (or modification)
☐ GSA Schedule or GWAC: Identify Schedule/Contract
☐ Other: Identify

Plan ID Number: 2026-LGR-0178
Contractor (or Brand Name): Indelt Broadcart TE-3 Robotics Equipment
Estimated Value (Base and all options): [redacted]
Period of Performance: 06/30/2026 – 06/29/2027

3. Description of Supplies or Services Required to Meet Library Needs

The Library requires the following supplies or services:

The Video lab at the NAVCC seeks to procure one (1) Indelt Broadcart TE-3 videotape migration robotic systems (with the possibility to purchase up to three (3) additional Indelt robotic systems for a total of four (4), if all optional purchases are exercised), to add to the existing fleet of robotic units. The purpose of this procurement is to support automated videotape migration and preservation, increase overall digitized output capacity, and expand the range of supported videotape formats within the Video Lab's robotic migration workflow. The contractor shall provide a fully integrated robotic videotape migration system, including all required hardware, software, and firmware. The existing robotic systems are of an older generation, and this procurement will enhance the Video Lab's processing capabilities by increasing the volume of videotape digitization and enabling the simultaneous processing of multiple tape formats, including new formats such as DVC-Pro. The Indelt robotic systems represent the first stage of the automated videotape digitization process. The robotic units are controlled by computer encoder servers that operate the encoding software responsible for converting analog and digital video signals into digital archival files with associated metadata. Internal connectivity and control of the robotic systems are performed through custom software specifically designed to interface with and manage the Indelt units. The Indelt robotic systems have been in continuous service since 2012, while the encoder servers supporting the systems were replaced in 2025.

Part 2 – Program Office Justification & Approval

4. Authority for Contracting Without Competition

Over $350,000

For this requirement of over $350,000, under FAR part 6, the basis for contracting without providing for full and open competition is:

- ☐ There is only one responsible source and no other supplies or services will satisfy Library requirements. 41 U.S.C. § 6101(b)(2)(C); FAR 6.302-1.
  - ☐ Library's minimum needs can only be satisfied by contractor's unique capabilities or products. FAR 6.302-1(b)(1).
  - ☐ Source controls copyrights, patents, raw materials, or secret processes cannot be acquired otherwise, or similar circumstances. FAR 6.302-1(b)(2).
  - ☐ Other exception identified in FAR 6.302-1:
- ☐ There is such unusual & compelling urgency that the Government would be seriously injured if competition is not limited. 41 U.S.C. § 6101(b)(2)(B); FAR 6.302-2. Option years are not permitted.
- ☐ Source is expressly authorized or required by statute (e.g., AbilityOne, UNICOR, GPO, GSA Public Buildings Service, Appropriations Act, etc.) per 41 U.S.C. § 6101(b)(1) and FAR 6.302-5:
- ☐ Other basis authorized in 41 U.S.C. § 6101(b) or FAR part 6.302:
- ☒ Library's needs can only be satisfied by a brand-name product or item which is essential to the Government's requirements. FAR 6.302-1(c).
- ☐ The Product is listed on the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

Up to and including $350,000

For this requirement up to $350,000, using simplified acquisition procedures under FAR part 13, the basis for contracting without providing for full and open competition is:

- ☐ Only one responsible source is reasonably available to meet Library requirements. 41 U.S.C. § 6101(b); FAR 13.106-1.
  - ☐ Product or service is reasonably available from only one source.
  - ☐ Source controls copyrights, patents or other exclusive licensing arrangements.
  - ☐ Urgent circumstances; only one source can reasonably deliver by required date. Option years are not permitted.
  - ☐ Source is expressly authorized or required by statute:
- ☐ Library's needs can only be satisfied by a brand-name product
- ☐ The Product is listed the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

GSA Schedule Order

For this GSA schedule order under FAR part 8, the basis for not competing among GSA schedule-holders and/or specifying a brand name product or item is:

- ☐ An urgent and compelling need exists, and following GSA procedures would result in unacceptable delays. FAR 8.405-6(a)(1)(i)(A).
- ☐ Only one GSA source is capable of fulfilling the requirement at the level of quality required because the supplies or services are unique or highly specialized. FAR 8.405-6(a)(1)(i)(B).
- ☐ In the interest of economy and efficiency, the new work is a logical follow-on to an original order that <u>was</u> placed competitively among GSA schedule-holders (i.e., the original order was not sole-source or limited-source.) FAR 8.405-6(a)(1)(i)(C).
- ☐ Library's needs can only be satisfied by a brand-name product
- ☐ The Product is listed on the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

Order Under Multiple Award Indefinite-Delivery Contract or GWAC

For this order under FAR subpart 16.5, the basis for contracting without providing for full and open competition is:

- ☐ The need is so urgent fair opportunity would result in unacceptable delays. 41 U.S.C. § 6101(b)(2)(C) and FAR 16.505(b)(2)(i)(A).
- ☐ The Library's minimum needs can only be satisfied by contractor's unique capabilities or products. 41 U.S.C. § 6101(b)(1) and FAR 16.505(b)(2)(i)(B).
- ☐ A logical follow-on order in the interest of economy and efficiency. 41 U.S.C. § 6101(b)(1) and FAR 16.505(b)(i)(2)(C).
- ☐ To satisfy a minimum guarantee. 41 U.S.C. § 6101(b)(1) and FAR 16.505(b)(2)(D).
- ☐ Authorized or required by statute. 41 U.S.C. § 6101(b)(1) and FAR 16.505(b)(2)(E).
- ☐ The Library's minimum needs can only be satisfied by a brand-name product or item which is essential to the Government's requirements. 41 U.S.C. § 6101(b)(2)(B) and FAR 16.505(a)(4)(i).
- ☐ The Product is listed on the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

5. Rationale for Contracting Without Competition

We are authorized to limit competition on the basis of the citation in section 4 because:

The Indelt Broadcart T3 is a brand-name requirement because the Library has an operational need for equipment that is fully compatible with existing robotic systems, software, workflows, and infrastructure. The Library already operates Indelt robotic systems integrated into the Video Lab's existing infrastructure. Using the same brand ensures full interoperability, consistent workflows, continued use of existing software and infrastructure.

Use of alternative brands would require significant software redevelopment, infrastructure modifications, workflow redesign, and additional integration costs. The Indelt robotic system is the only acceptable brand identified through market research, and the Broadcart T3 is the only product capable of meeting the Library's operational and technical requirements. Brand-name justification is necessary due to the Library's specific need for the Indelt Broadcart T3 robotics system based on its unique features, proprietary integration capabilities, and compatibility with existing robotic systems.

This robotics equipment is essential to the Library's operations because it is highly specialized and must be integrated seamlessly with existing robotic systems currently installed within the Video Lab. The Video Lab currently operates a robust and complex Indelt robotic workflow system, and must maintain continuity of operations, functionality, and compatibility across all systems. Use of alternative brands would create substantial compatibility and integration issues with the Library's existing infrastructure, software, and workflows, resulting in significant operational disruption. This could be extensively disruptive for the team at NAVCC. Accordingly, it is essential to procure robotic systems from the same brand manufacture to ensure full compatibility with the existing systems, software, and workflows. Introducing equipment from another brand manufacturer would create significant integration challenges and require costly infrastructure and workflow modifications.

Competition for this brand-name product is still expected because any authorized reseller can provide the Indelt robots.

6. Actions to Overcome Barriers to Competition Before Subsequent Contract Is Required

To increase competition, we will: The program office, through the Video Lab supervisor, will continue to monitor industry developments to determine whether additional vendors become available for future procurements.

7. Program Office Certification

I certify that the description of the Government's minimum needs, schedule requirements, and technical information that provide the basis for this justification are accurate and complete.

[redacted]

PART 3 – CONTRACTING OFFICER DETERMINATIONS & CERTIFICATION

8. Efforts to Solicit from As Many Potential Sources As Practicable

Unless a justification is based on FAR 6.302-2, Unusual and compelling urgency, contracting officers shall post justifications for other than full and open competition, including brand name justifications, to the Contract Opportunities website on sam.gov (or eBuy for Brand Name Justifications under FAR Part 8) prior to requesting a proposal or otherwise entering into negotiations.

- ☐ Advance notice will be published in sam.gov for 15 days before a contract is awarded. FAR 5.203(a).
- ☐ Advance or concurrent notice will be published in sam.gov for a reasonable time for commercial items FAR 5.203(a) and 12.204(b).
- ☒ Advance notice will not be published because the action meets the following FAR exception:
  - ☐ Notice would compromise national security. FAR 5.202(a)(1).
  - ☐ Unusual and compelling urgency; notice period would seriously injure Government. FAR 5.202(a)(2).
  - ☐ Expressly authorized or required to be made through another Government agency. FAR 5.202(a)(4).
  - ☐ Order will be placed against an IDIQ contract awarded under FAR 16.5. FAR 5.202(a)(6).
  - ☐ Order will be placed against GSA schedule or other competitively-awarded contract. FAR 5.202(a)(11).
  - ☒ Other: This Brand Name Justification shall be included as an attachment to the solicitation.
- ☐ Advance notice will not be published per 41 U.S.C. § 6101; see attached deviation from the FAR per LCR 7-210 § 3.A.

We made the following efforts to interest potential sources in this award: N/A – However, market research has identified multiple vendors who could supply the Indelt robot products.

9. Listing of Sources That Expressed Interest in Writing

The following sources expressed interest in this award: N/A – However, market research has identified multiple vendors who could supply the Indelt robot products.

10. Additional Information

The following additional information is relevant to this justification and approval: N/A

11. Contracting Officer Determination that Price Is Fair and Reasonable

As explained in detail below, I have determined that the prices for this contracting action are fair and reasonable based on comparison of the prices to the following (see FAR 15.404-1(b)(2)):

☒ Historical prices paid by the Government
☒ Library's Independent Government Estimate
☒ Other: Any other methods of price justifications
☒ Published competitive price lists
☒ Prices obtained through market research
☒ Prices obtained through competitive proposals

The following analysis (based on attached pricing information) supports my determination: A fair and reasonable pricing determination shall be made before any award is issued.

12. Contracting Officer Determination of Responsibility

☒ Checked System for Award Management (or will check in the case of competitive proposals for a brand name product) – SAM will be checked before an award is made.

13. Contracting Officer Determination of Best Value

I have determined that this action represents the best value to the Government because: A best value determination shall be made before any award is issued.

14. Contracting Officer Certification

I certify that, to the best of my knowledge and belief, this justification is accurate and complete. For those actions up to $750,000, I approve contracting without competition for this requirement.

James R. Robinson	James R. Robinson	05/28/2026
Name	Signature	Date