JUSTIFICATION & APPROVAL

UNITED STATES TRANSPORTATION COMMAND (USTRANSCOM)
DIRECTORATE OF ACQUISITION (TCAQ)

JUSTIFICATION FOR AN EXCEPTION TO FAIR OPPORTUNITY

TRANSCOM Reference Data Management (TRDM) HTC711-23-F-D009
Justification Control Number: 26-47

1. CONTRACTING ACTIVITY.

United States Transportation Command, Directorate of Acquisition, IT Programs & Support Services Division (USTRANSCOM/TCAQ-D), 508 Scott Drive, Scott AFB, IL 62225.

2. NATURE AND/OR DESCRIPTION OF ACTION BEING APPROVED.

This action modifies task order HTC71123FD009 to add one (1) twelve-month option period, allowing FedTec Ventures LLC (FedTec) to continue delivering on-site maintenance and modernization of the TRDM system.

3. DESCRIPTION OF SERVICES REQUIRED TO MEET THE AGENCY'S NEEDS (INCLUDING ESTIMATED VALUE).

USTRANSCOM relies on contracted services for on-site specialized systems engineering to maintain, modernize, and secure the TRDM system, which delivers accurate collection, management, distribution, and interoperability of authoritative reference data across Department of War transportation and logistics systems. FedTec maintains TRDM's databases, user interfaces, web services, cybersecurity compliance, cloud migration, and customer service functions to provide reliable, secure, and resourceful data sharing for USTRANSCOM and its components. These essential services equip USTRANSCOM and its mission partners with timely and accurate data to inform global command and control (C2) and distribution decision-making capabilities.

In 2022 the Government competitively awarded FedTec task order HTC71123FD009 as a 100% Small Business set-aside. The current period of performance includes a ten-month base period and three (3) one-year options ending on 30 September 2026. The added option period runs 1 October 2026 – 30 September 2027 at an estimated value of $[redacted] and includes Firm

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CUI Category/ies: ~~PROCURE~~
Limited Dissemination Control: ~~FED ONLY~~
POC: [redacted]

Fixed Price contract line items with a Time and Material contract line item for travel and other direct costs.

4. IDENTIFICATION OF THE EXCEPTION TO FAIR OPPORTUNITY AND SUPPORTING RATIONALE.

Federal Acquisition Regulation (FAR) 16.507-6(b)(2), "Only one awardee is capable of providing the supplies or services required at the level of quality required because the supplies or services ordered are unique or highly specialized."

The TRDM program is entering a critical re-evaluation period as it transitions program management oversight from USTRANSCOM's Command, Control, Communications & Cyber Systems Directorate (TCJ6) to USTRANSCOM's Program Executive Office (PEO) in the Acquisition Directorate (TCAQ) on 1 October 2026. This transition stems from an initiative approved by the TCJ6 and TCAQ Directors to align the command's core data capabilities with its operational mobility mission. The TRDM contract delivers requirements analysis, functional data collection, reference data management and distribution implementation, system fielding, integrated release scheduling, system interoperability testing, and integrated test plan documentation—all of which must be aligned with USTRANSCOM's transportation and logistics programs managed by the PEO. Concurrently with this realignment are several ongoing modernization initiatives within the context of Zero Trust mandates, which have proven more significant and complex than originally understood, including:

- Metadata and data grooming, labeling, and tagging functions
- Defense Information Systems Agency (DISA) e-ICAM (Identity, Credential, and Access Management) onboarding
- Web application firewall
- Ongoing data and metadata refinement and stewardship

The ongoing project timelines for these initiatives make it impractical to compete a follow-on requirement until the PEO has formally assumed control of the TRDM program and established a stable, forward-looking requirements baseline that meets all mandated standards. Moreover, transitioning to a new contractor during this critical modernization phase is not feasible, as only the incumbent, FedTec, possesses the USTRANSCOM system-specific expertise necessary for timely and accurate implementation. FedTec is currently leading the integration of TRDM into USTRANSCOM's enterprise Data Mesh architecture. Changing contractors mid-integration would significantly disrupt the alignment of core data capabilities with the operational mobility mission, undermining critical progress. Additionally, FedTec's ongoing data and metadata refinement activities involve the continuous grooming, labeling, and stewardship of over 1,500 data tables from more than 250 sources, supporting 42 partner systems. Retaining FedTec is necessary to mitigate risks of data mismanagement, loss, errors, and compliance issues during this pivotal transition. Finally, FedTec is uniquely qualified, possessing the deep institutional knowledge of TRDM's architecture and data flows required to implement a new web application firewall and onboard to DISA's e-ICAM services. Awarding this work to any contractor other than FedTec would introduce significant risks, including security vulnerabilities and loss of operational continuity.

5. DETERMINATION BY THE CONTRACTING OFFICER THAT ANTICIPATED COST TO THE GOVERNMENT WILL BE FAIR AND REASONABLE.

The Contracting Officer will determine price reasonableness by performing a detailed price analysis pursuant to FAR 15.404-1(b). FedTec's proposed price will be compared against historical pricing on task order HTC71123FD009 and the Independent Government Cost Estimate. The Contracting Officer will apply additional price analysis techniques as warranted, document the findings in the Price Negotiation Memorandum, and finalize the modification only upon confirming the proposed price is fair and reasonable.

6. ANY OTHER FACTS SUPPORTING THE JUSTIFICATION.

N/A

7. A STATEMENT OF THE ACTIONS, IF ANY, THE AGENCY MAY TAKE TO REMOVE OR OVERCOME ANY BARRIERS THAT LED TO THE EXCEPTION TO FAIR OPPORTUNITY BEFORE ANY SUBSEQUENT ACQUISITION FOR THE SUPPLIES OR SERVICES IS MADE.

During this option period, the PEO will identify and finalize critical PWS updates to establish a stable, mature requirements baseline for full and open competition of the follow-on action.

8. CONTRACTING OFFICER'S CERTIFICATION.

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

KRAFT.LISA.A.1[redacted]
Digitally signed by KRAFT.LISA.A[redacted]
Date: 2026.06.12 06:36:52 -05'00'

LISA A. KRAFT
Contracting Officer

9. TECHNICAL OR REQUIREMENTS PERSONNEL CERTIFICATION.

I certify that the supporting data which forms a basis for this justification are complete and accurate.

[redacted]

Contracting Officer Representative

10. WRITTEN DETERMINATION OF THE APPROVING OFFICIAL IDENTIFYING THE CIRCUMSTANCE THAT APPLIES TO THE ORDER.

Based on the above cited justification, I hereby determine the circumstance in FAR 16.507-6(b)(2) applies to this justification for an exception to fair opportunity.

[redacted]
Competition Advocate