Memorandum for Record – Limiting Competition at or below the Simplified Acquisition Threshold

1. Requiring Activity: [redacted]

2. Contracting Activity: [redacted]

3. Description of Action: Request approval to award a new $164,197.63 noncompetitive five-year (base and four one-year options) Firm-Fixed-Price (FFP) contract to Christian Copyright Licensing International (CCLI), CAGE: 0JX20. The contract will be fully funded using appropriate Fiscal Year (FY) Operations and Maintenance Army (OMA) funds.

Nature of Requirement: ☐ New ☒ Follow-on ☐ Extend

Brand Name: ☐ Yes ☒ No

Contract Vehicle: ☒ Purchase Order
☐ Blanket Purchase Agreement (BPA)
☐ Order/BPA against FSS Contract #_____
☐ Order against multiple award IDIQ Contract
☐ Order against a single award IDC Contract
☐ Modification to existing PO/TO/DO/Call Order

Pricing/Contract Type: ☒ Fixed Price
☐ Cost Reimbursable

Funds: FY: _2026_____
☒ Operations & Maintenance, Army (OMA)
☐ Other Funds: _____

Name of Proposed Contractor(s) and Address:

Christian Copyright Licensing International, LLC
17205 SE Mill Plain Blvd Ste 150
Vancouver, WA 98683-7527

4. Description of Services or Supplies: The Installation Management Command (IMCOM) Religious Support Office (RSO) has a requirement for non-personal services to provide Christian Copyright Licensing International (CCLI) SongSelect Advanced Music Subscription and Christian Music Licensing. This includes the rights for storage, reproduction, distribution, public display, and performance of digitally transmitted sound

recordings in support of military religious and worship activities. This service enables the Government to use SongSelect music and its lyrics in public settings, display lyrics, and perform other functions with the music.

Period of Performance:

[redacted]

5. Authority: Select the appropriate authority below:

☒ FAR 12.201-1 For commercial acquisitions valued at or below the simplified acquisition threshold

Limiting Sources when Ordering under the Federal Supply Schedule
☐ GSAM 538.7104-3(b)(1)(i) - Urgency
☐ GSAM 538.7104-3(b)(1)(ii) - Only One Source is Capable
☐ GSAM 538.7104-3(b)(1)(iii) - Logical Follow-on
☐ GSAM 538.7104-3(b)(1) (iv) - Satisfy minimum guarantee
☐ GSAM 538.7104-3(b)(1) (v) - Authorized or required by statute
☐ GSAM 538.7104-4 - Items peculiar to one manufacturer

Exceptions to Fair Opportunity
☐ FAR 16.507-6(b)(1) - Unusual and urgent need
☒ FAR 16.507-6(b)(2) - Only One Awardee is Capable
☐ FAR 16.507-6(b)(3) - Logical Follow-on
☐ FAR 16.507-6(b)(4) - Minimum Guarantee
☐ FAR 16.507-6(b)(5) - Statute Authorizes / Requires Purchase from Specified Source
☐ FAR 16.507-6(b)(6) - Satisfies Exception under FAR 6.103
☐ FAR 16.507-7 - Items peculiar to one manufacturer

6. Reasons for Authority Cited:

a. Background: This is a follow-on requirement. The current contract, W9124J-21-P-0008, was awarded as a Base Year with 4, 12-month Option Years. The current PoP is 14 June 25 – 13 June 26. The current contract was awarded to Christian Copyright Licensing International, LLC and the contractor has performed satisfactorily under the current contract.

CCLI is the only reasonable source that can provide the required supplies and licensing. The Government is currently using CCLI music subscriptions and licenses. CCLI has no authorized retailers that sell its subscriptions or rights to sell the licensing it administers on behalf of various music labels. The Government has made a significant investment in its current inventory of religious music subscription; personnel are familiar with the website and capabilities.

b. Alternatives: To assess the competitive landscape, the Government conducted target market research of industry websites. While several providers offer music subscription services, none were found to offer a unified solution combining both subscriptions and licenses. Furthermore, the Government identified no competitors capable of providing licenses that support critical secondary requirements, including music storage, reproduction (e.g., recording/copying), distribution, public display/projection, or the creation of derivative works (e.g., arrangements or translations). Christian Copyright Licensing International, LLC is the only vendor that offers streaming music subscriptions, downloading (storage), manipulations, display, reproduction, and the requisite legal coverage.

c. Impact if not approved: If the justification is not approved, the IMCOM Religious Support Office will be unable to legally use, display, or reproduce copyrighted religious music during worship services. This would force congregations to rely strictly on the limited scope of the Religious Service Exemption, severely degrading the quality and active participation of 57 congregational worship services and risking potential copyright infringement.

7. Publicizing Contract Actions:

a. The public display and synopsis requirements of FAR 5.101(a) and FAR 5.101(d)
☐ do not apply, less than $20K threshold
☒ apply and will be followed
☐ do not apply due to an exception at FAR 5.101(b)(1)( )

b. Requirement to post justification in accordance with, FAR 12.102(a)(2), GSAM 538.7104-3(a)(3) or FAR 16.507-6(f) unless:
☒ Action is not a brand name restriction and is under SAT, no posting required.
☐ Action is a brand name restriction, under $40K, no posting required.
☐ Action is a brand name restriction over $40K but will not be posted due to the following exception:
☐ FAR 6.301(e)
☐ GSAM 538.7104-3(b)(3)(i)(B)
☐ FAR 16.507-6(f)(4)

8. Market Research: The Government conducted Market Research IAW FAR Part 10 and DFARS 210.001. A Sources Sought Notice (SSN W9124J-26-Q-CHMU) was posted on SAM.gov from 14 May 2026 to 20 May 2026. One vendor (BHPE, LLC)

responded but failed to provide a capability statement. Further market research via web searches and a review of the SBA Dynamic Small Business Search (DSBS) under NAICS 512230 confirmed that while other music publishers exist, CCLI is the only source capable of providing the comprehensive package of SongSelect software and specific copyright licenses required for military religious services.

9. Other Facts: Procurement history.

Contract Number	Contractor	Procurement Method	Amount	Period of Performance
W9124J-21-P-0008	Christian Copyright Licensing International LLC	Sole Source FAR 12.201-1	$142,077.66	14 June 2021 through 13 June 2026

10. Technical/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]

Chaplain Comptroller

11. Contracting Officer Certification/Approval I hereby determine that the anticipated price/cost to the Government for this contract action will be fair and reasonable. This determination will be made using price analysis in accordance with FAR 12.203 specifically by comparing the proposed price to historical prices paid.

I certify that this justification is accurate and complete to the best of my knowledge and belief, and that completing this purchase as a sole source is in the best interest of the Government. Additionally, I approve this justification to limit competition subject to the availability of funds and provided that the services or supplies herein described have otherwise been authorized for acquisition.

[redacted]

Contracting Officer