FEDERAL SUPPLY SCHEDULE SOLE SOURCE JUSTIFICATION FOR AN ORDER EXCEEDING THE SIMPLIFIED ACQUISITION THRESHOLD (AUTHORITY: GSAM/R 538.7104-3

Requisition 144002-26-0062

This acquisition is conducted under the authority of the Federal Supply Schedule Program.

1. **Agency and contracting activity.** Department of Commerce, NOAA Acquisition and Grants Office (AGO), Satellite and Information Acquisition Division (SIAD) and the Office of Satellite and Product (OSPO) within the National Environmental Satellite, Data, and Information Service (NESDIS).

2. **Nature and/or description of the action being approved.**

   This is a sole source justification for a logical follow-on order to the current Federal Supply Schedule order, GS35F517AA/1332KP23FNEEB0007 to SIMBA Enterprises, LLC. It is intended that a firm-fixed priced order will be awarded to:

   SIMBA Enterprises, LLC
   39 Port Evans Road NE
   Leesburg VA, 20176
   Robert Strickland
   571-431-9941

3. **Description of the supplies or services required to meet the agency's needs (including the estimated value).**

   NOAA has an ongoing requirement for a commercial satellite data broadcast service to deliver environmental data as part of an integrated global system named GEONETCast America (GNC-A). GEONETCast is a near real-time, global network of satellite-based data dissemination systems designed to distribute space-based, air-borne and in situ data, metadata and products to diverse communities.

   GNC-A has been operational since spring 2008. GNC-A provides broadcast coverage to most of North America and all of the continental U.S., South America, Central America and the Caribbean Basin. GNC-A is used to send level II satellite imagery, environmental data and a wide range of product files to a widely distributed user community in the Americas. Data and products are provided by trusted, national and international content producers via the internet or dedicated lines to an uplink teleport. These data files are received by a data management system uplink server(s) and broadcast by a commercial satellite telecommunications service provider to low-cost, user receive terminals located under the footprint of the satellite broadcast.

   The expected period of performance is an 11-month base period from June 13, 2026 to May 12, 2027 and three (3) 12-month option periods from May 13 to May 12 annually. The estimated value of the logical follow-on is $[redacted] for this firm fixed price order.

4. **Authority and supporting rationale.** The following circumstance justifies limiting the source as supported below:

   Logical Follow-on under the authority of GSAM/R 538.7104-3(b)(1)(iii) – In the interest of economy and efficiency, the new work is a logical follow-on to an original Federal Supply Schedule (FSS) order, GS-35F-517AA/1332KP23FNEEB0007. The original order was placed in accordance with the applicable FSS ordering procedures. The original order was not previously issued under sole-source or limited sources procedures.

   If this requirement were competitively solicited and awarded to a contractor other than the incumbent, a minimum 90-day transition period would be required. The transition period includes 60 days to design and build a new infrastructure system that is compatible with the Government's specific needs and 30 days for testing and training of the new system. This necessary transition period would delay the start of the follow-on GNC-A service until after the transition period.

   The incumbent contractor, Simbacom, currently leases a transponder from Intelsat. Because this lease dictates the technical requirements for end-users, the service provided to the Government is heavily predicated on the specific terms of that agreement. While the Government recognizes that potential competitors may propose alternative vendors or distinct technical methodologies for transponder utilization, transitioning to an alternative architecture at this time would result in unacceptable delays in fulfilling the agency's requirements and introduce a high risk of mission-critical service degradation. Furthermore, even if a competing offeror were to utilize Intelsat, they could not automatically assume Simbacom's existing terms and conditions, as vendor lease agreements are independently negotiated and proprietary to each respective business.

   In 2023, when the current contract was awarded, Simbacom incurred no significant start-up costs because they teamed with the long-term incumbent, Knight Sky, LLC (awardee since 2013). This allowed Simbacom to retain critical staff, prevent knowledge loss, and maintain the existing IS-21 satellite transponder. This would be unlikely to occur again, as for the 2023 award of the current contract, Knight Sky was no longer eligible to compete due to their business size. For a follow-on to the current contract, Simbacom is still considered a small business and would be expected to compete for a follow-on contract were it to be competitively awarded.

   If transitioning to a new vendor that cannot leverage the incumbent's infrastructure, the required categorical start-up efforts and costs to re-establish service would include the following:

   - **Planning & Approvals:** Procuring existing satellite link configurations and inventory; submitting transition/transmission plans for Government approval.
   - **Infrastructure Setup:** Deploying teleport teams; installing/moving modems and datacasting hardware; and provisioning internet connectivity.
   - **Testing & Implementation:** Implementing new satellite carriers and confirming end-to-end network functionality across regions.
   - **End-User Ground Modifications:** Modifying feedhorns for circular polarization, procuring larger antennas (for users on 1.8m dishes), and repointing antennas to a new satellite (e.g., IS-34).
   - **Training & Handoff:** Create new system documentation and execute user training.

Pursuing a competition and transitioning to a new Contractor is at a minimum estimated to incur approximately $[redacted] in additional, non-recoverable costs compared to a logical follow-on to the current Contractor and would delay the fully operational start of the new contract by more than three months. This cost generally includes: **Direct Labor:** Project Manager, Senior Developer, and Senior Engineer Technician; **Travel:** Costs to assume responsibility for the GNC-A system hardware located at the Ellenwood, GA teleport; and **Materials:** Equipment and software purchases (which would likely need to be processed as Order Level Materials). The estimated cost does not account for the substantial expense of the Government program office personnel's time to provide an extensive level of Government technical direction to solve problems that arise with a transitioning-in of a new Contractor with a new infrastructure system, which includes reestablishing broadcast service; reviewing and accepting new system acceptance plans; testing of the new system; and training associated with initial configuration and installation by the new Contractor on the new system once implemented. There will likely be an additional cost to external stakeholders to be trained on the new system and for such stakeholders to purchase new hardware compatible with the new system. Additionally, the existing, functional infrastructure built by the incumbent and current Contractor would need to be dismantled upon contract conclusion and it would be inefficient to stand-up a new infrastructure while the existing one is fully functional.

The transition period would also impact the period of performance, reducing the base period by 3 months as funding for the transition period would be pulled from the base year budget which is already limited.

Lastly, transitioning to a new Contractor may require the Contractor to initiate new service with Intelsat DVB-S2 and the new Contractor may not have access to the satellite capacity that the current Contractor would have.

Based on the above, it is in the interest of economy and efficiency to award a logical follow-on contract, directly saving the Government both time and money. This approach eliminates the redundant infrastructure design, build, testing and training; the $[redacted] in transition costs; and any associated program office personnel time for transitioning activities.

5. **Determination by the ordering activity contracting officer that the order represents the best value consistent with GSAM/R 538.7102-2(b)(4).**

The Contracting Officer will conduct price analysis to ensure the proposed prices are fair and reasonable based on a comparison to the independent government estimate which is based on current contract pricing. In addition, the Contracting Officer will do a comparison to the Contractor's GSA rates to ensure pricing does not exceed GSA established rates and seek further price discounts or other concessions before placing an order. The Contractor's GSA rates have already been determined to be fair and reasonable by the GSA Contracting Officer. The Contracting Officer determines that the order represents the best value.

6. **Market research conducted among schedule holders (or reason market research was not conducted).**

Market research was completed by reviewing offerings and price lists under SIN 517410 under the GSA schedules for four contractor holders: 1) SIMBA Enterprises, LLC (incumbent), SBA Certified Small Disadvantaged, 2) RiteNet Corporation, SBA Certified Small Disadvantaged 3) Bushtex, Inc., a Women Owned Small Business, and 4) Telecom International, LLC, an SBA Certified Small

Disadvantaged Business which covered all of the requirements in the performance work statement.

Of the four contractors assessed, two possessed the baseline capabilities to perform the work as demonstrated in their participation in the previous acquisition process—the incumbent (Simbacom) and one other offeror. However, as detailed in Section 4, utilizing the non-incumbent contractor would necessitate substantial, duplicative start-up efforts and transition times. Therefore, pursuing an award with the non-incumbent is not in the interest of economy and efficiency, making a logical follow-on with the incumbent the only viable strategy.

7. Any other facts supporting the justification.

In July 2025 H.R.1 – 119th Congress was passed. This law requires the auction of C-Band spectrum by July 2027. This auction will significantly affect the GNC-A requirement.

On September 25, 2025 NOAA released a Request for Information (RFI) to gain further market research on current industry technical solutions and the effect of the auction in order to develop a technical roadmap, understand cost tradeoffs and risks associated with the loss of C-Band frequencies used by GNC-A resulting from the auctioning of the C-Band spectrum. The Technical Team reviewed the responses and determined that there is also uncertainty in industry given the wide spectrum of potential solutions. All RFI respondents have some ideas of what the impact to the GNC-A program are, but they range from low impact to high impact with many unknowns.

This shows, for both Government and industry, the results of the C-Band auction are very much uncertain. The Government would not be able to define a post-auction GNC-A requirement and evaluating proposals for a post-auction requirement would be difficult. Additionally, the potential cost implications are also unknown. With the impact of the auction being unknown, investing in the transition to a new contractor would not be in the best interest of the Government at this time.

Post-auction the Technical Team will review the Government's needs and evaluate the new post-auction environment and evaluate the next steps forward.

8. Actions, if any, the agency may take to remove or overcome any barriers that led to the restricted consideration before any subsequent acquisition for supplies and services is made.

OSPO will continue to conduct research and monitor industry results from the C-Band Auction to see if the requirement is still needed and if there are capable Contractors who can meet these requirements.

9. Technical/Requirements Representative Certification.

I certify that this requirement constitutes the Government's minimum needs and the supporting data provided herein is accurate and complete to the best of my knowledge and belief. [redacted]

Program Office/COR

10. Office of General Counsel Review.

Review

[redacted]

Office of General Counsel

11. Contracting Officer's Certification and Approval

I certify that the circumstances of the acquisition deem only one source reasonably capable of providing the products, services, or solutions.

Approve

[redacted]

Contracting Officer

12. Approval for Justifications >$900K.

NOAA Competition Advocate:

Approve

[redacted]

NOAA Competition Advocate