[redacted]

Department of the Air Force: Justification for Other Than Full and Open Competition

For use when a justification and approval as described in RFO 6.104 is required, to include restricting competition under Part 12 for acquisitions valued over SAT.

[redacted]

Date	Contracting Officer	Signature
[redacted]		
I certify that this justification is accurate and complete to the best of my knowledge and belief.		

Date	Requirements Personnel	Signature
[redacted]		
I certify that the supporting data herein, which is my responsibility, is accurate and complete.		

COORDINATION

Date	Legal Review	Signature
[redacted]		

Date	Chief of the Contracting Office	Signature
[redacted]		

APPROVALS (RFO 6.104-2(a) Table 6-1 & R-DFARS 206.104-72 Table 206.1)

Date	Competition & Commercial Advocate	Signature
[redacted]		

[redacted]

Department of the Air Force: Justification for Other Than Full and Open Competition

I. Agency and Contracting Activity (RFO 6.104-1(a)(1)):

911 AW/MSG/PK
2375 Defense Ave., B210
Coraopolis, PA 15108

II. Nature and/or description of the action being approved (RFO 6.104-1(a)(2)):

Pittsburgh Air Reserve Station, PA (PARS) proposes to award a five (5) month extension to the existing Base Operations Support (BOS) bridge contract with Firm-Fixed-Price (FFP), Labor Hour (LH) and Cost Reimbursement (CR) Contract Line Item Numbers (CLINs) for work that cannot be accurately predicted, to the incumbent BOS services contractor, Criterion Corporation (CAGE 0KJM5), a Service-Disabled Veteran Owned (SDVOSB) and Woman Owned Small Business (WOSB).

The previous long-term contract, FA671217C0002, was competed with a Period of Performance (PoP) of 1 September 2017 to 28 February 2023, and contained FFP, LH and CR CLINs. These services are currently being performed under the existing bridge contract, FA671223C0004, with a PoP of a six (6) month base (1 March 2023 to 31 August 2023), a six (6) month extension option (1 September 2023 to 29 February 2024), followed by a secondary extension adding a nine (9) month extension (1 March 2024 to 30 November 2024), a five (5) month extension (1 December 2024 to 30 April 2025), a six (6) month extension (1 May 2025 to 31 October 2025), and an eight month extension (1 November 2025 to 30 June 2026).

A new long-term competitive effort has been in the works since early May 2023 and the Request for Proposal (RFP) was anticipated to be posted mid-October 2023. However, the acquisition was halted prior to the release of the RFP when PARS was directed to change the course of the Source Selection Plan (SSP) by the Headquarters (HQ) Air Force Reserve Command (AFRC) A4 - Director of Logistics, Engineering and Force Protection. As a result, the new long-term competitive effort SSP had to be re-evaluated and the long-term RFP was officially solicited in Contract Opportunities on 19 March 2025. The Government is currently in the middle of the source selection process.

Initial proposals were received and initial evaluations were completed. As a result of the extensive initial evaluations done by the evaluation team members, the length of the evaluations took longer than expected. Due to this, an eight month extension was added to allow adequate time for discussions, evaluation of the Final Proposal Revisions (FPRs), and award of a new contract.

However, the complexity of the FPRs received necessitated a continuous and rigorous interaction cycle between the technical evaluation team and the Source Selection Chairperson. To ensure a highly defensible, fair, and legally sufficient evaluation, the Chairperson required multiple rounds of reviews and clarifications with the evaluators. This iterative consensus process, while adversely extending the overall schedule, was critical to ensure that all technical ratings were thoroughly documented, consistently applied across all offerors, and strictly aligned with the solicitation's evaluation criteria.

As such, a five (5) month extension will be needed to the current contract in order to allow for finalization of the evaluation documentation, provide adequate time for the review and approval process, award a contract, allow for a transition period (if required), and respond to any protests that might arise after award notification.

This bridge contract extension is being conducted under Revolutionary FAR Overhaul (RFO) 6.103-1, Only one responsible source and no other supplies or services will satisfy agency requirements. The PoP of this bridge contract will have a five (5) month extension (1 July 2026 to 30 November 2026). The CLIN structure for this bridge contract will mirror the CLIN structure of the current contract. This justification is made on an individual basis.

III. Description of supplies/services required to meet agency needs (RFO 6.104-1(a)(3)):

The BOS Services are Mission Essential Services to support Pittsburgh ARS, PA and its DoD mission to provide strategic airlift of airborne forces, equipment and supplies. More specifically, the BOS Services include all personnel, supervision, equipment, tools, materials, test equipment, supplies, and services necessary to accomplish the following functions:

(1) Materiel Management which is defined as the continuous actions that plan, organize, direct, coordinate, control and evaluate the application of resources to ensure the effective and economical support of the military base within the 911th Logistics Readiness Squadron (LRS).

(2) Ground Transportation and Vehicle Management which provide accountability management, and maintenance services for the base vehicle fleet, selected registered and non-registered equipment, and transient vehicles.

(3) Traffic Management Operations which provide a full range of traffic management services for base organizations, to include day-to-day, exercise and contingency operations.

(4) Real Property Maintenance which provides preventive maintenance (PM) and corrective maintenance (CM) service calls for facility maintenance for all real property, and Real Property Installed Equipment (RPIE).

(5) Fuels Management which provides fuels management services to wing, tenant, and transient organizations, as defined by the Performance Work Statement (PWS).

Appropriated funding for the extension CLINs are FY2026 Air Force Reserve Command Operations & Maintenance (3740).

Five (5) Month Extension Period of Performance and CLIN Breakout: (1 July 2026 to 30 November 2026)
==========
CLIN 7002: Base Supply; FFP; [redacted]

CLIN 7003: Vehicle Operations and Maintenance; FFP; ~[redacted]

CLIN 7004: Traffic Management Operations; FFP; ~[redacted]

CLIN 7006: RPM PM - General; FFP; ~[redacted]

CLIN 7007: RPM PM - Pavement Clearance; FFP; [redacted]

CLIN 7008: RPM PM - Pest Control; FFP; ~[redacted]

CLIN 7009: RPS PM - Facilities Management; FFP; ~[redacted]

CLIN 7010: RPS PM - Grounds Maintenance; FFP; [redacted]

CLIN 7011: Fuels Management; FFP; ~[redacted]

CLIN 7020: RPM Reimbursable; CNF; ~[redacted]

CLIN 7021: RPS Reimbursable; CNF; ~[redacted]

CLIN 7022: RPS Pest Control Reimbursable; CNF; ~[redacted]

CLIN 7023: RPS Facility Management Reimbursable; CNF; ~[redacted]

CLIN 7024: RPS Grounds Maintenance Reimbursable; CNF; ~[redacted]

CLIN 7025: Base Supply SCA/O&A; LH; ~[redacted]

CLIN 7026: Vehicle Operations and Maintenance SCA/O&A; LH; [redacted]

CLIN 7027: Traffic Management Operations SCA/O&A; LH; ~[redacted]

CLIN 7029: Fuels Management SCA/O&A; LH; ~[redacted]

CLIN 7032: Vehicle Operations Reimbursable; CNF; [redacted]

Total Estimated Value (Option Period): [redacted]

The methodology used to calculate the total estimated value was based on current BOS contract expenses with a [redacted] inflation adjustment rate added to the previous PoP CLINs. Reimbursable/labor hour CLINs are just estimates and will be adjusted based on available funding.

Four (4) preceding J&As are associated with this document under Pittsburgh ARS BOS contract, FA671223C0004, and are listed in sequential order below:

(1) FA671223C0004 - Emergency Bridge Contract, six (6) month with six (6) month extension J&A dated 27 March 2023 IAW FAR 6.302-2, Unusual and Compelling Urgency

(2) FA671223C0004-P00006 - Nine (9) month with five (5) month option bridge extension J&A dated 28 February 2024 IAW FAR 6.302-1, Only One Responsible Source - No Other Supplies or Services Will Satisfy Agency Requirements

(3) FA671223C0004-P00014 - Six (6) month bridge extension J&A dated 16 April 2025 IAW FAR 6.302-1, Only One Responsible Source - No Other Supplies or Services Will Satisfy Agency Requirements

(4) FA671223C0004-P00018 - Five (5) month with three (3) month option bridge extension J&A dated 17 October 2025 IAW FAR 6.302-1, Only One Responsible Source - No Other Supplies or Services Will Satisfy Agency Requirements

IV. Statutory Authority Permitting Other Than Full and Open Competition (RFO 6.104-1(a)(4)):

10 U.S.C. 3204(a)(1), Only one responsible source and no other supplies or services will satisfy agency requirements.

V. Rationale for Use of Authority (RFO 6.104-1(a)(5)):

IAW RFO 6.103-1, the services provided by the current contractor, Criterion Corporation, are unique based on the nature of BOS services. The PARS BOS services have been designated as mission-essential functions IAW R-DFARS 252.237-7023, Continuation of Essential Contractor Services (DFARS clause 252.237-7023 is cited in the current contract FA671223C0004) as well as identified in paragraph A6.3 of the Performance Work Statement. BOS services are of such a critical nature that these services must be performed 7 days a week/24 hours a day, under all circumstances so that Pittsburgh ARS is able to function, perform its DoD mission and responsibilities. Failure to perform/sustain BOS services would significantly affect the DoD's/ PARS's ability to provide vital services, exercise authority, direction and control. Because of the limited performance periods, retaining the existing contractor is in the best interest of the Government. Continued timely performance is required to prevent an unacceptable delay in fulfilling the agency's BOS services requirements. An unacceptable delay is defined as a break in mission critical/essential services if the current contract does not continue performance.

The current PARS BOS services contractor, Criterion Corporation, has performed the PARS BOS services for the past seven (7) years, and has over sixteen (16) years of experience performing similar BOS services at various U.S. Air Force locations such as Pittsburgh ARS, Youngstown ARS, March ARB, as well as multiple U.S. Army locations. As the incumbent contractor, Criterion has the unique operational knowledge of the services and challenges required to ensure no break in the provision of essential contractor services while PARS finishes the competitive procurement for the follow-on BOS contract. These mission-essential services are of such a critical nature that any delay in the award of this extension would result in an immediate and serious impact to PARS's ability to function and perform its primary DoD mission and responsibilities.

To illustrate the serious mission impact that would occur at PARS if BOS services stopped, beginning 1 November 2025, the 911th Airlift Wing, 32d Aerial Port Squadron and the 758th Airlift Squadron would cease operations, resulting from the loss of Fuels Management support, Materiel Management support, and Traffic Management operations. Furthermore, all other tenant organizations located at Pittsburgh ARS would be immediately and negatively impacted with the loss of vital services such as Vehicle Operations and Maintenance support and Real Property Maintenance support.

This serious mission impact would also negatively affect environmental management activities, pavement clearance

activities, pest control activities, facilities maintenance, facilities repairs, and HVAC sustainment activities, which are critical to military operations. Additionally, a work stoppage of PARS BOS services would result in grossly neglected installation and critical flight-line conditions.

PARS does not have the government-owned equipment, tools, or personnel to perform the services provided under this contract. Therefore, it is imperative that PARS retains the performance of these BOS services. A loss/gap in BOS services provided under this effort would not only result in the shutdown of Pittsburgh's mission-essential functions, it would also drastically affect its ability to exercise vital services, authority, direction, control, and support to its tenant organizations such as Headquarters, 4th Air Force and the Naval Operational Support Center.

The current PARS BOS services contractor, Criterion Corporation, is the only source that can provide the immediate capabilities necessary to meet the total BOS service requirements. Criterion Corporation has the financial stability and resources in place (e.g., all personnel, supervision, equipment, tools, materials, test equipment, and supplies) to continue performance of all BOS mission-essential services without a costly and unacceptable delay.

VI. Integrated Market Analysis and Efforts to Solicit Competition (RFO 6.104-1(a)(6), (8), and (10)):

It would have been impracticable to solicit offers from sources other than the current contractor, to include a limited competition, due to the short time remaining until the expiration of the current PoP on 30 June 2026. With the numerous requirements included in the BOS contract, the vast amount of initial award contract deliverables, along with need for site-visits, question-and-answer period, negotiations, mobilization/de-mobilization period, if applicable, and the time frame required for solicitation posting, there is not enough time between the current contract PoP end date and the ability for a new contractor to take over all aspects of the BOS contract without creating an undue delay to the mission. The exorbitant start-up/mobilization costs for any new contractor to try and take over all BOS requirements, hire and transition all personnel, purchase all required materials, vehicles, equipment, submit all Contract Data Requirement List (CDRL) deliverables/reports, and have any new personnel trained and ready to go by 1 July 2026 is impractical from an initial start-up cost perspective. Especially if there is no guarantee the new contractor will be awarded the long-term contract after this short-term effort expires in order to recuperate all of their initial start-up/upfront mobilization costs.

A notice of this bridge action will be publicized in Contract Opportunities no later than 15 June 2026.

VII. Determination of Fair and Reasonable Cost (RFO 6.104-1(a)(7)):

The Contracting Officer is responsible for evaluating, determining, and documenting the anticipated contract cost/price is fair and reasonable in accordance with RFO Subpart 15.4, Contract Pricing.

VIII. Any Other Facts Supporting the Justification (RFO 6.104-1(a)(9)):

Per RFO 6.103-1, *Only on responsible source and no other supplies or services will satisfy agency requirements*, is appropriate as any lapse in the award of a contract for BOS services which provides mission-essential services could result in the shut down of operations at PARS. The bridge contract extension will provide the minimum time necessary to finalize proposal evaluation efforts, award the new contract, and allow adequate time to resolve any potential preaward or post award protests.

Several Air Force Reserve Command (AFRC) locations anticipated an award of a FFP competitive contract prior to the expiration of the previous long-term PARS BOS Services contract. The below timeline is relevant to the PARS BOS requirement because the Logistics, Engineering, and Security Forces Directorate (HQ AFRC/A4) BOS Performance Work Statement is used across AFRC bases with minor changes for unique base requirements.

On 25 June 2021, an interested party on the Westover Air Reserve Base (ARB), MA, BOS Request for Proposal (RFP) FA660621R0001 under notice FA660621RWESTOVERBOS, filed a pre-award protest with the Government Accountability Office (GAO) challenging the terms of the solicitation which differ from the terms of the current Westover ARB BOS contract,

to include the category of services (currently non-commercial/now considered commercial); and type of contract (currently cost reimbursement/now entirely firm-fixed price). The protest focused on the impact of these changes primarily related to the corrective maintenance CLINs as industry typically performs corrective maintenance on some type of "reimbursable" basis. The Air Force decided to take corrective action consisting of revising the minimum requirements and making any other corrective actions deemed necessary. On 20 July 2021, GAO dismissed the protest stating that the Air Force has committed itself to revising the solicitation and to provide offerors with the opportunity to respond to the revised solicitation. The Air Force deemed it in everyone's interest (Air Force and offerors) to cancel the current RFP, modify/extend the existing contract, and release a new RFP.

Dobbins ARB, GA then posted a separate BOS RFP FA670322R001 under a notice titled Dobbins BOS Services, through https://www.sam.gov (SAM) on 24 December 2021. On 10 February 2022, another pre-award protest was filed by an interested party with the GAO. The protest sited multiple reasons, but mainly focused "on the feasibility of commerciality" and the FFP CLIN structure, inclusive of the corrective maintenance. On 22 February 2022, GAO dismissed the protest based on AFs decision to take corrective actions.

Prior to the protest received for the Dobbins ARB, GA BOS RFP, Homestead ARB, FL posted their own BOS RFP on 14 January 2022 in SAM under RFP FA664322R0003 with notice Homestead ARB BOS Services Limited Competition. On 25 January 2022, another pre-award protest was filed by an interested party with the GAO. The protest sited multiple reasons, but was consistent with the Dobbins ARB, GA protest.

After the multiple protests, the Air Force made the decision to withdraw any AFRC BOS RFPs until the necessary corrections have been made to both the solicitations and Performance Work Statements (PWS) for AFRC BOS efforts.

The new PARS BOS long-term competitive effort had been in the works since May 2023 and the Request for Proposal was anticipated to be posted mid-October 2023. However, the acquisition was halted prior to the release of the RFP when PARS was directed to change the course of the Source Selection Plan (SSP) by the Headquarters (HQ) Air Force Reserve Command (AFRC) A4 - Director of Logistics, Engineering and Force Protection. As a result, the new PARS long-term competitive effort SSP has been revamped and recently re-evaluated. After extensive reviews between the 911th Air Wing Program Manager, 911th Mission Support Group Contracting Officer, HQ AFRC Contracting and HQ AFRC Legal personnel, Business Clearance approval by the Senior Contracting Official was finally received 19 March 2025.

The new RFP was officially synopsized in Contract Opportunities on 19 March 2025. Proposals have been received and the Government is currently going through the source selection process. Government has held one round of discussions and is finalizing award recommendation documentation for review.

Award of a competitive long-term contract is estimated to be released in August 2026. However, award date for the long-term contract may be further impacted by pre/post award protests or further mandated acquisition strategy changes.

Plan of Action & Milestones (POA&M): Estimated Original: Revised: Actuals:

==========

Business Clearance Review Briefed and Approved: ---

Post Request for Proposal Solicitation: ----------

Pre-Proposal Conference/Site Visit: ----------

RFP/Solicitation Questions Due: ----------

Solicited Contractor Proposals Due: ----------

Conduct Initial Source Selection Evaluation Board: ---

Complete Initial Source Selection Evaluation Board: -

Conduct Discussions: ----------

Request Contract Clearance Step 1 - FPR: ----------

[redacted]

Department of the Air Force: Justification for Other Than Full and Open Competition

Solicited Contractor FPR Due: ----------

Conduct FPR Source Selection Evaluation Board: ------

Complete FPR Source Selection Evaluation Board: ----

Close Discussions/Draft Pre-Award/Award Document

Staff Judge Advocate Review/Approval: ----------

Route Contract Clearance Step 2 - SSDD: ----------

Contract Clearance - SSDD Brief/Approval: ----------

Source Selection Authority Brief/Approval: ----------

Send Congressional Notification (DD1279): ----------

Unsuccessful Notice of Award/Debriefs: ----------

Potential Protest Initiated: ----------

Successful Notice of Award Posting: ----------

Target Award Release Date: ----------

Post-Award Conference/Kick-off Meeting: ----------

Mobilization Period 60 days (if needed):

Follow-on Contract Start: ----------

IX. Actions to Overcome Barriers to Competition (RFO 6.104-1(a)(11):

The new procurement was synopsized in Contract Opportunities on 19 March 2025. A source selection evaluation is currently underway. There are no competitive barriers on the long-term effort.