Justification for an Exception to Fair Opportunity or to Use Brand-Name Restriction

Is this a brand-name justification? ☐ Yes ☒ No

Is this a Bridge Action as defined in the AF Bridge Action Reduction Plan? ☐ Yes ☒ No

Contracting Activity: United States Space Force
Space Systems Command/CMK (COMSO)
14850 Conference Center Drive
Chantilly, VA 20151

Purchase Request / Local ID Number: #26-20

Program Name (and Program Element, if applicable): SBS005507 Warrior Plan Task Order 2

Estimated Cost/Price of the Order (including options): [redacted]

Type Program (see AFFARS 5302.101 for definitions): ☒ PEO Program ☐ Operational ☐ Enterprise

Type of Determination: ☒ Individual ☐ Class Expires: [click and select]

Fair Opportunity Exception: FAR 16.505(b)(2)(i) (Check the applicable subparagraph below.)

☐ (A) ☒ (B) ☐ (C) ☐ (D) ☐ (E) ☐ (F) ☒ (G) Check this box to display the FAR 6.302 exceptions.

6.302 Exception: 6.302-3 Industrial mobilization; engineering, developmental, or research capability; or expert services.

Click here for instructions to complete the boxes below.

(1) Contracting Activity:
United States Space Force Space Systems Command/CMK (COMSO 14850 Conference Center Drive Chantilly, VA 20151

(2) Nature and/or description of the action being approved:
Nature of Action - This specific effort involves issuing a Firm Fixed Price (FFP) Task Order, designated as "Warrior Plan Task Order 2," to OneWeb Technologies. The purpose of this action is to procure broadband proliferated low earth orbit (PLEO) commercial satellite communications (COMSATCOM) services, ultimately to ensure a global pooled OneWeb service plan supporting fixed, land/mobile, maritime, and aviation missions with a centralized management platform and enhanced features and security capabilities. The Warrior Plan Framework - In September 2025, this procurement effort was established as a project known as the "Warrior Plan." A Warrior Plan is an enterprise service plan funded and acquired by the COMSATCOM Office (CSCO) for use by the Joint Force in accordance with the approved Command, Control, and Communications (C3LB) plan. This action supports the first Warrior Plan requirement, and multiple task orders are expected to be awarded over time to secure various PLEO services and capabilities. Background and Authorization - This acquisition follows an FY25 Presidential Decision Memorandum (PDM) which required the Space Force, in coordination with the Joint Force, to develop a plan for the procurement of PLEO commercial satellite communications. The CSCO led the development process, which culminated in the C3LB approving the plan in

[redacted]

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August 2025. The C3LB provides overarching strategic oversight for the department's enterprise communications architecture, directly guiding the CSCO's execution of commercial satellite communications (SATCOM) procurement. Supporting the C3LB, the SATCOM Systems Engineering Group (SSEG) serves as the executive-level governance forum that defines the technical and integration requirements CSCO must fulfill when acquiring commercial SATCOM services. These services are designed to meet Joint Force operational requirements as directed by the PDM.

Funding and Distribution -

Operations and Maintenance (O&M, AF) (3400) appropriations to fund this contract action are derived from Fiscal Year 2026 (FY26) allocations specifically to execute the technical requirements and architecture defined by the SSEG. The CSCO will distribute these services to the Joint Force in accordance with the approved C3LB plan, utilizing the new and anticipated FY26 - FY30 funding allocation.

(3) Description of the supplies/services required to meet the agency's needs:

To connect to this commercial network, SSC/CMK procures OneWeb terminals under the PLEO IDIQ. Those terminals are ruggedized multi-network "smartphones" [redacted] Service lines provide the "path" whereby the OneWeb satellite constellation transmits/receives data to/ from OneWeb terminals. To maximize efficiency, SSC/CMK will secure this bandwidth through "pooling". Pooling is the equivalent of a shared, enterprise-wide "family data plan" that allows the DoW to quickly shift a portion of the capacity the proposed acquisition will acquire to whichever unit or mission needs it most when they need it.

Specifically, the services the USSF will acquire under Warrior Plan Task Order 2 include:

(1) Base service lines (Fixed, Land/Mobile, Maritime): [redacted] pooled service lines; 1.8 PB maximum of shared data.

(2) Management platform: provide a centralized management platform. The Task Order will include successfully completing Platform Acceptance test and conducting two live training sessions.

(3) Security and support: maintain strict Information Assurance (IA) compliance, outage reporting, and operate a 24/7 administrative and technical helpdesk.

(4) Scalability and outreach: guarantee rapid capability surging (5-day activation for new lines/capacity) and provide Subject Matter Experts (SMEs) to support Joint Force outreach events.

(5) Intellectual property (IP), including a management platform test and demonstration plan, a recording of training sessions, training materials, an activation report, monthly usage reports, incident reports, and helpdesk performance reports. In accordance with DFARS 252.227-7015(c)(1), the Government will acquire unrestricted rights to training sessions and training materials. With respect to the remaining deliverables, the Government will acquire the IP license specified in DFARS 252.227-7015(c)(2).

(6) Option for aviation lines: [redacted] pooled aviation lines supporting up to [redacted] OneWeb terminals with global and polar coverage; unlimited data.

(7) Option for surge capacity and scalability: additional data capacity (600TB and 900TB); maximum of [redacted] self-funded sub-pools.

The period of performance of the services described in items 1-5 above will be for one year. The period of performance of the services described in items 6-7 above will be one year.

[redacted]

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(4) Identification of the exception to fair opportunity and the supporting rationale:

Note: This Justification for an Exception to Fair Opportunity is being executed under the governing authority of the Revolutionary FAR Overhaul (RFO). These authorities expressly supersede and replace the legacy citations of FAR 16.505 embedded within this Justification form. There are two predominant authorities applicable to this procurement: 1) RFO 16.507-6(b)(2); and 2) RFO 16.507-6(b)(6), which is supplemented by RFO 6.103-3(b)(1).

1) Only One Awardee is Capable of Providing the Services Required -

Authority: In accordance with RFO 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.

Market research was conducted during the period June 2025 through March 2026 and confirmed that while other PLEO systems and suppliers exist, none currently meet the full scope of the Government's requirements as fulfilled by OneWeb Technologies. There is no other supplier capable of providing the required level of services because they are uniquely configured and highly specialized for current DoW mission needs. The DoW has a critical requirement for instantaneous, hardware-level control over satellite bandwidth to support assets in contested environments.

I. Unique, Direct Ownership and Constellation Capacity Surge
OneWeb Technologies is the only awardee under the PLEO IDIQ that possesses direct ownership and operational control of its space segment. This direct ownership is the critical enabler for the rapid pooling and physical reallocation of national data resources. There are over 500 OneWeb terminals capable of supporting hundreds of Joint Force missions. OneWeb terminals currently in the DoW's inventory cannot transmit/receive data transmitted by/received by SpaceX's Starshield or Amazon's LEO constellations.

II. Lack of Market Substitutes and Reseller Limitations
Market research revealed that, while OneWeb has authorized resellers (i.e., Hughes, RiteNet) of OneWeb satellite communication services, none of those resellers offer the packaged, pooled capacity services described in Section 3 above. The reason why is because resellers and third-party oversight platforms do not own commercial satellite constellations and thus the services they sell are limited by service level agreements between themselves and the owners of commercial satellite constellations. As a result, those firms cannot provide instantaneous redirection of satellite bandwidth to satisfy DoW requirements. Only OneWeb Technologies can fulfill the requirement for consistent, lower-priced, global coverage across active and operational terminals compliant with national security needs.

III. Specialized Mission Impact (Contested Environment Example)
The specialized nature of this direct constellation control is best demonstrated in contested operational scenarios. If an F-15 operating in contested airspace experiences a failure of primary line-of-sight communications or encounters localized jamming, the pilot becomes isolated. By leveraging direct constellation control and pooling, command and control for that F-15 could be restored in real-time.

IV. Unique Operational Features and Market Research
OneWeb's service is currently unmatched by any alternative COMSATCOM service for the following technical reasons:

Global Architecture: The OneWeb constellation provides robust, global coverage with over [redacted] satellites, offering a unique combination of maximum information rate and committed information rate (CIR) data speeds using lightweight/portable terminals.

[redacted]

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DoW-Centric Design: Hosted on the commercial constellation, the service offers features tailored for national security, including Point of Presence (PoP) pinning, network priority, extended coverage, and military-authorized terms of service.

Integration and Sunk Costs: As stated above, the DoW currently has procured over [redacted] OneWeb terminals capable of supporting hundreds of Joint Force missions. These terminals are solely compatible with the OneWeb constellation.

Competitor Timelines: Market research (June 2025 - March 2026) shows peer competitors cannot meet immediate needs. SpaceX does not offer equipment compatibility or CIR services for land/mobile/maritime operations. Amazon LEO is less than 12 months away from meaningful production service offerings, and its initial coverage area will be significantly smaller than OneWeb's. [redacted]

2) Industrial Mobilization -

Authority: In accordance with RFO 16.507-6(b)(6) and RFO 6.103-3(b)(1) — Industrial Mobilization / National Emergency

I. Cultivating a Competitive Base for Operation Epic Fury
The execution of Warrior Plan 2 with OneWeb Technologies is a critical component of a broader DoW strategy to cultivate a robust, resilient, and competitive COMSATCOM industrial base. This deliberate diversification is a foundational requirement for industrial mobilization, particularly to ensure the Joint Force is prepared for large-scale, highly contested engagements such as Operation Epic Fury.

II. PDM Directive and Structural Implementation
This action is the direct implementation of the FY25 Presidential Decision Memorandum (PDM). The PDM explicitly directed the Space Force, in coordination with the DOD CIO and the Services, to provide a plan to support Army, Navy, Marine Corps, and Air Force broadband SATCOM needs via commercial PLEO services to the Command, Control, and Communications Leadership Board (C3LB). The C3LB approved the plan on August 6, 2025. This PDM-directed strategy is expected to be authorized by the FY26 NDAA and resourced by an impending appropriations bill.

III. Mitigating Single Points of Failure
To achieve this competitive mobilization base and satisfy the PDM, the DoW is distributing its enterprise PLEO requirements across four distinct capability sets. By securing services across SpaceX, OneWeb, Iridium, and Amazon, the Government actively mitigates the risk it will experience a single point of failure. Because if one company's satellite constellation is degraded, the Government can pivot to using any one or all of the remaining satellite constellations to provide commercial satellite communications capability.

The anticipated mobilization structure is as follows:

[redacted]

(5) Contracting Officer's determination that the anticipated cost to the Government will be fair and reasonable:

The Contracting Officer will determine that the anticipated cost to the Government is fair and reasonable by analyzing OneWeb's IDIQ level pricing, historical order level information, and the Independent Government Cost Estimate (IGCE).

[redacted]

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Additionally, in accordance with R-DFARS 212.204(a), R-DFARS 215.404-170, and R-DFARS PGI 215.404-170, the Contracting Officer will use OneWeb's published commercially available pricing plans as a point of departure to establish a fair and reasonable price. Multiple OneWeb retail sites indicate the same volume of service is priced at over [redacted] per month. This price is influenced by supply and demand to ensure that OneWeb competitively grows its business. To account for the fact that some of the services OneWeb will provide under the proposed contract action are unique requirements that are not included in OneWeb's published commercially available pricing plans, the contracting officer will leverage technical analysis to determine by how much that pricing must be adjusted to account for those unique requirements.

(6) Other facts supporting the justification:

N/A - Refer to the previous sections.

(7) Actions the agency may take to remove or overcome any barriers to increasing fair opportunity before any subsequent acquisition for the supplies or services:

The Government will continue to monitor the PLEO marketplace, and as competitors enter the market and mature over the next few years, the Government will remove sole source requirements wherever possible. However, the other PLEO contractors and industry writ large will need to offer and provide services that are just as deployable, with lightweight terminals, and compliant with military use cases. The Government cannot advance other suppliers' global coverage, equipment offerings, and constellations in earnest. Such is industry's responsibility and the cost of doing business. The PLEO IDIQ permits all contractors to update their offerings to ensure we are removing Government-based barriers to competition.

Additionally, in an effort to overcome barriers to competition, the Government will execute Warrior Plan 2 as a task order under the PLEO OneWeb Technologies IDIQ for a base performance period of 12 months. Before the expiration of this period or the issuance of any follow-on actions, the Government will conduct a fair opportunity re-evaluation to determine the procurement strategy for the continued support of Warrior Plan 2 requirements. This approach ensures immediate mission support while maintaining compliance with federal acquisition standards. By setting a 12-month limit, the Government retains the flexibility to reassess the marketplace and technical requirements as it relates to this fair opportunity exception before committing to long-term follow-on efforts.

(8) Program Manager's certification that supporting data is accurate and complete:

As evidenced by my signature below, I certify that any supporting data contained herein, which is my responsibility, is both accurate and complete.

(9) Contracting Officer's certification that the justification is accurate and complete:

As evidenced by my signature below, I certify that the justification is accurate and complete to the best of my knowledge and belief.

(10) Approving Official's determination that one of the circumstances in FAR 16.505(b)(2)(i) applies to the order.

As evidenced by my signature below, I hereby determine that the fair opportunity exception checked on page 1 applies.

[redacted]

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Date 10 Feb 2026	Chief, Commercial Satellite Communications Office [redacted]	Signature [redacted]
Date 14 May 2026	Contracting Officer [redacted]	Signature [redacted]
Date 14 May 2026	Local Legal Reviewer [redacted]	Signature [redacted]
Date 14 May 2026	Chief of the Contracting Office (COCO) [redacted]	Signature [redacted]
Date 15 May 2026	Competition Advocate [redacted]	Signature [redacted]
Date	[Title] [Name] [Office Symbol / Phone Number]	Signature
Date	[Title] [Name] [Office Symbol / Phone Number]	Signature

[redacted]

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Instructions for Completing the Template IAW FAR 16.505(b)(2)(ii)(B)

(2) State whether the action is a new order or a modification to an existing order. Identify the basic multiple award contract number and the order number for the current action. Also identify the type of the order/line items on the order (e.g., Firm Fixed price, Cost Plus Fixed Fee, etc.).

(3) Specifically describe the supplies/services to be acquired including the price/cost and quantity of each item in the order and the total estimated value of the order. For services, state whether services are performance-based, and if not, provide rationale for not being performance based. State the delivery/performance schedule/period for the items under the order. Explain how the requirement/order fits under the scope of the basic multiple award contracts. (Note: The Contracting Officer must ensure that the order is issued within the period of performance and within the maximum value of the contract).

(4) Include the appropriate exception from FAR 16.505 (b)(2) and the supporting rationale. FAR16.505(b)(1)(i) requires the Contracting Officer to provide each awardee under a multiple award contract, a fair opportunity to be considered for each order exceeding $3,000 unless a statutory exception applies. The specific exception that precludes the fair opportunity process for this acquisition is FAR 16.505(b)(2)(i)(__) [Insert A,B, C, D, or E]. If a brand name product description is being justified, use this section to explain why the particular brand name, product, or feature is essential to the Government's requirements and why other companies' similar products/services do not meet, or cannot be modified to meet, the agency's needs.

FAR 16.505(b)(2)(i)(A): "The agency need for the supplies or services is so urgent that providing a fair opportunity would result in unacceptable delays". When using this exception provide a detailed justification with supporting documentation that explains the exact urgency of the requirement and the mission impact if awarded to any other contractor. The user/customer typically provides this supporting information. Recommend attaching supporting documentation to the back of the document. General statements of urgency are not acceptable.

FAR 16.505(b)(2)(i)(B): "Only one awardee is capable of providing the supplies or services required at the level at the level of quality required because the supplies or services ordered are unique or highly specialized". When using this exception provide a detailed justification, with supporting documentation, as evidence of the "unique or highly specialized" nature of the procurement. The user/customer typically provides this supporting information. Supporting documentation may be attached to the back of the document. General statements are not acceptable.

FAR 16.505(b)(2)(i)(C): "The order must be issued on a sole-source basis in the interest of economy and efficiency as a logical follow-on to an order already issued under the contract, provided that all awardees were given a fair opportunity to be considered for the original order". When using this exception provide information on the previously competed order under this contract and detail the economies and efficiencies that will be obtained by going sole source for the follow-on order. The user/customer typically provides this supporting information. General statements are not acceptable.

FAR 16.505(b)(2)(i)(D): "It is necessary to place an order to satisfy a minimum guarantee."

FAR 16.505(b)(2)(i)(E): "For orders exceeding the simplified acquisition threshold, a statute expressly authorizes or requires that the purchase be made from a specified source."

Discuss the market research that was conducted by the user/technical team/contracting officer among the supplies/services of all awardees that resulted in the conclusion that a fair opportunity exception applied. The narrative in this section should provide a high level of confidence that the requirements of FAR 16.505(b)(1) and DFARS 216.505-70 could not be met. If no market research was conducted, state so and provide the rationale. If any other awardee expressed interest in fulfilling the requirement, but was not considered a potential source, explain why that awardee cannot provide the required supplies/perform the service.

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If the use of a brand name purchase description is being justified, the market research should include an analysis of any industry proposed alternative products or approaches to meeting the requirements. Additionally, the Government's efforts to identify as many potential sources as practicable offering the required brand name item(s) should be addressed.

(5) This paragraph needs to be tailored based on the types of CLINs in the order and the pricing arrangements on the basic multiple award contract. If the contract did not establish the price for the supply or service, the Contracting Officer must establish prices for each order IAW FAR 15.4. The paragraph needs to describe the steps that will ensure that the prices/estimated cost of the order will be fair and reasonable. For example, even if firm-fixed prices were obtained under adequate price competition in the award of the multiple award contract, the Contracting Officer still needs to consider market conditions and other factors that may have changed since contract award and explain the basis in the determination that prices/costs are fair and reasonable prior to award of the order.

(6) Provide any other facts supporting the use of exceptions to the fair opportunity process.

(7) Include a statement of the actions, if any, to be to be taken 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. If no actions are planned, so state and provide reasons.