Control Number: 26-024

JUSTIFICATION REVIEW DOCUMENT
FAR Part 6 Justification and Approval
for Other than Full and Open Competition

Program/Equipment: Modular Office Trailer at Laughlin Air Force Base (AFB), TX

Authority: Title 10 United States Code (U.S.C.) §3204(a)(1) as implemented in Federal Acquisition Regulation (FAR) 6.103-1(b), one responsible source in fulfilling the agency's requirements.

Amount: $*932K*

[redacted]

Reviews: I have reviewed this justification and find it adequate to support other than full and open competition.

Program Manager/CDR, 315th Engineer Battalion:
LTC Kyle Wagner *Phone: (509) 230-4328*
Commanding Officer
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Control Number: 26-024

Small Business Program:
Mr. Charles Allen
Small Business Program Specialist
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Control Number: 26-024

FAR Part 6 Justification and Approval
for Other than Full and Open Competition

1. Requiring Activity: *315th EN BN, Task Force Guardian, (AO East), Joint Task Force-Southern Border, Lot 100, Yellow Brick Road, Laughlin Air Force Base, Texas 78843.*
2. Contracting Activity: 922nd Contracting Battalion, Fort Campbell, Kentucky, deployed in support of Joint Task Force Southern Border mission with contracting oversight from 410th Contracting Support Brigade, Fort Sam Houston, Texas.

3. Description of Action: Request approval to award a new $932K noncompetitive five-year (base and four one-year options to include FAR 52.217-8) Firm-Fixed-Priced (FFP) definitive contract to Integrated Modular Solutions, LLC., CAGE: 69VG8, 210 E 5th St., Bonham, TX 75418. The contract will be fully funded using appropriate Fiscal Year (FY) 26 Operations and Maintenance Army (OMA) funds."

4. Description of Supplies/Services: The Mission Support Services requirement is necessary to support Southern Border mission with services to furnish and install one (1) temporary modular office facility at Laughlin Air Force Base, Texas, in support of Joint Task Force–Southern Border (JTF SB) operations.

Period	*Period of Performance (POP)*	*Estimated Value*
Base	*01 JUNE 2026 through 31 MAY 2027*	*$150K*
Option 1	*01 JUNE 2027 through 31 MAY 2028*	*$150K*
Option 2	*01 JUNE 2028 through 31 MAY 2029*	*$150K*
Option 3	*01 JUNE 2029 through 31 MAY 2030*	*$150K*
Option 4	*01 JUNE 2030 through 31 MAY 2031*	*$260K*
	Estimated Total Price	*$857K*
FAR 52.217-8	*01 JUNE 2031 through 30 DEC 2031*	*$75K*
	Estimated Overall Total Price	***$932K***

5. Authority Cited: Title 10 U.S.C. §3204(a)(1) as implemented in FAR 6.103-1(b), one responsible source in fulfilling the agency's requirements.

6. Reason for Authority Cited:
a. Background: The 315th Engineer Battalion requires uninterrupted use of te existing Relocatable Building (RLB) Tactical Operations Center (TOC) located at Laughlin Air Force Base, Del Rio, Texas. This facility serves as the battalion's only secure mission-command node and houses the BN Command Group, S1, S2, S3, S4, S6, S8, special staff, HHC, and FSC sections. The RLB contains integrated classified communications infrastructure, including SIPR/NIPR hardline drops, a Small Network Node (SNN) operating on Starlink transport, crypto devices, and classified radios with active fills.

The facility is a controlled restricted area with buried secure cables, utilities, and network pathways. The proposed contractor is the only responsible source capable of providing continued support without dismantling or exposing classified systems. Any vendor other than the incumbent would be required to perform a full teardown and reconstruction of the RLB compound, which would directly expose classified communications pathways, secure cabling, and sensitive utility trenches. No technical data package or engineering documentation exists that would allow another vendor to safely access or modify the classified infrastructure without interrupting secure operations.

The RLB's critical infrastructure is permanently integrated into Laughlin AFB's base systems. The facility's utilities, including water, electrical power, and sewer are fully tied into the installation's infrastructure through buried conduits and secure utility trenches. These connections were engineered specifically to support the battalion's classified communications architecture and cannot be disconnected, rerouted, or reconstructed without exposing secure pathways and disrupting mission-critical systems. Because these utilities are physically integrated into the base and directly support SIPR/NIPR hard-lines, the facility cannot be dismantled or replaced without prolonged loss of secure command-and-control capability.

Market research confirms that no known vendors maintain cleared personnel capable of working inside an active classified environment without shutting down SIPR services. Relocation or reconstruction of the TOC would result in a minimum 20-day loss of secure command-and-control capability, which is an unacceptable delay in fulfilling the agency's requirement risk under FAR 6.103-1(b)

There have been no significant changes since the previous procurement that would allow for full and open competition. The classified nature of the facility and the integrated secure infrastructure remain unchanged.

b. Alternatives:

1. Competitive Acquisition: A competitive action would require a new vendor to dismantle the existing modular trailer, expose classified cabling, and reconstruct the facility. This would shut down SIPR/NIPR services, expose secure pathways, and create unacceptable national-security risks. No alternative vendor possesses the required clearances or access to work within the classified environment without service interruption.

2. Use of In-House Government Resources: The Government does not possess the engineering, construction, or secure-facility technical capability to maintain or reconstruct the modular trailer without exposing classified systems. No organic unit within the 315th Engineer Battalion, 130th MEB, or JTF-SB has the required expertise or authority to modify classified infrastructure.

3. Suspension of Contract Support: Suspending support would immediately degrade the battalion's ability to conduct secure mission command. The modular trailer is the

only SIPR-capable facility available in the Del Rio sector. Loss of the TOC would eliminate the battalion's ability to execute secure operations.

4. Relocation to Another Facility: No alternate SIPR-capable facility exists on Laughlin AFB or within the Del Rio sector. Establishing a new secure facility would require months of construction, new utility trenches, and installation of classified communications infrastructure, none of which can occur without exposing secure systems.

5. Extension of the Current Contract: An extension is not viable because the requirement is for continued uninterrupted use of the existing RLB under a new period of performance. The current contract expires on 31 MAY 2026. The incumbent remains the only responsible source capable of providing this support without compromising classified systems.

c. Impact if not approved: If this justification is not approved, the Government will be required to pursue competitive action that would necessitate dismantling the existing RLB TOC. Doing so would expose SIPR and NIPR cabling and secure communication pathways, shut down all classified communications for a minimum of twenty days, and eliminate the battalion's only secure mission-command node. This disruption would significantly increase the risk of spillage or compromise of classified systems and would expose the secure network architecture to uncleared vendor personnel. The resulting loss of secure command-and-control capability would cause substantial operational degradation to JTF-SB and the 315th Engineer Battalion and could lead to mission failure. These consequences represent unacceptable national-security risks and unacceptable delays in fulfilling the agency's requirements under FAR 6.103-1(b) and would directly jeopardize ongoing operations. Therefore, failure to approve this justification would result in mission degradation, increased security vulnerabilities, and operational delays that cannot be mitigated.

7. Efforts to Obtain Competition: The Contracting Officer will publish the notices required by FAR 5.101 and any responses received shall be considered.

Responses were received from vendors in response to the Sources Sought Notice posted on SAM.gov from 10-15 Apr 2026 ; however, effective competition is not expected among these respondents. Although required notices will be posted in accordance with FAR 5.101, the classified and fully integrated nature of the existing facility prevents any vendor other than the incumbent from performing the required work without dismantling or exposing classified systems. Such actions would result in the loss of security control capability and create unacceptable national security risks.

Any transition to a new vendor would require dismantling and reconstructing the RLB TOC, resulting in a minimum 20-day interruption of SIPR/NIPR services. This delay would jeopardize ongoing operations and degrade the battalion's ability to maintain secure mission-command functions. Therefore, while market research identified interested vendors, no vendor can perform the requirement without causing operational disruption and compromising classified infrastructure.

Additionally, the contractor must be an active 8(a) participant, as the requirement remains assigned to the 8(a) program. To remove the requirement from the 8(a) program, the Government must request SBA approval. If SBA approves the release, the requirement may then be competed or awarded among one of the following small business socioeconomic categories: HUBZone, Women-Owned Small Business (WOSB), or Service-Disabled Veteran-Owned Small Business (SDVOSB). The incumbent vendor is currently under the categories of WOSB and SDVOSB.

a. Subcontracting competition: Although this requirement is being pursued as a sole-source action, the Government will encourage the prime contractor to obtain competition to the maximum extent practicable in its subcontracting efforts.

8. Actions to Increase Competition: This action is a follow-on to contract W911SG-23-C-0007.

9. Market Research: The Contracting Officer posted a Sources Sought Notice on SAM.gov on 09 April 2026, which closed on 15 April 2026. All responses received were reviewed and the results of this inquiry are incorporated into this justification. The incumbent contractor confirmed that they remain willing and fully capable of continuing performance under a new contract upon expiration of the current agreement on 31 May 2026.

10. Interested Sources:

Vendor Name	CAGE Code	Business Size	Location	Point of Contact	Capability Assessment
Pacific Mobile Structures, INC.	0TYD9	SB	Chehalis, Washington	Name: Brian Schaefer Phone: 214-240-1162 seraphine@ecomirgroup.com	Capable
Gray National Contracting Group LLC	19W84	SB	Douglas, GA	Name: Joshua Gray Phone:912-592-9698 joshua@grayncg.com	Capable
Peawer Enterprises LLC	8M8J1	8(a) HUBZone	Del Rio, TX	Name: Mr. Don Owens Phone: 202-941-8143 don.owens@sba.gov	Capable

Vendor Name	CAGE Code	Business Size	Location	Point of Contact	Capability Assessment
Lunar Holdings	7WX93	WOSB	Ruskin, FL	Name: Mr. Michael B. Phone: 612-751-8618 sales@lunarholdings.org	Capable
Specialized Testing + Construction , INC.	97SC3	8(a)	Crowley, TX	Name: Mike Tarcau Phone: 817-228-0607 mtarcau@specializedtci.com	No capability statement provided
BHPE LLC	9SWS7	VOSB, SDVOSB	Oklahoma City, OK	Name: Mike Tarcau Phone: 405-205-5384 ss@bh.pe	No capability statement provided
PCI Support Services, LLC	7TAW5	8(a), HUBZone	Atmore, AL	Name: Rebecca Patti Phone: 251-359-8463 ss@bh.pe	Capable
Kaizen Mate	14KY5	SB	Granbury, TX	Name: Christopher Brewer Phone: 251-359-8463 ss@bh.pe	Capable
uth Solutions, Inc.	9DMG0	VOSB, SDVOSB	Lowell, MA	Name: Anthony Farelli Phone: 978-382-7099 anthony@monmouthsolutions.com	Capable
Kastel Enterprises MK, LLC	93AS8	8(a), HUBZone , WOSB	Mobile, AL	Name: Nicole Moats Phone: 251-278-8780 nicole.moats@kastelenterprises.com	Capable
Sabala MGT LLC	7N2H5	8(a), WOSB	Eagle, ID	Name: Markus Alley Phone: 251-278-8780 markus@Sabalamgmt.com	Capable

11. Other Facts:

Procurement History

Contract Number	Contractor	Procurement Method	Amount (est.)	Period of Performance
W911SG-23-C-0007 P00012	Integrated Modular Solutions, LLC	8(A) Sole Source FAR 6.204	$829K	19 JULY 2023 through 31 MAY 2026

Control Number: 26-024

1. Technical 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]

2. 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.

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3. Fair and Reasonable Cost Determination: 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 the pricing established under the previous contract for the same Relocatable Building (RLB) Tactical Operations Center requirement at Laughlin AFB. The prior contract provides a valid benchmark because it reflects the same scope of work, the same facility configuration, and the same classified infrastructure support requirements. The Contracting Officer will also consider the Independent Government Estimate (IGE), historical pricing trends, and an assessment of labor, material, and support costs associated with sustaining the existing secure facility. As part of the basis, certified cost or pricing data will not be required.

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SFC Catherine McKinney
Contracting Officer

4. Contracting Officer Certification: I certify that this justification is accurate and complete to the best of my knowledge and belief.

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SFC Catherine McKinney
Contracting Officer