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SOLE SOURCE JUSTIFICATION
FAR 52.217-8 Option to Extend Services

FOR

47QDCB21F0015
Amazon Web Services and Value Added Reseller Support

United States (U.S.) General Services Administration (GSA)
Federal Acquisition Service (FAS)
Assisted Acquisition Services (AAS) Civilian

Interagency Agreement Number 47QDCB19S0004

Controlled by AAS Contracting Officer: Amanda Ayers amanda.ayers@gsa.gov

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The General Services Administration (GSA) Assisted Acquisition Services (AAS) makes this Sole Source Justification for orders pursuant to General Services Acquisition Manual / Regulation GSAR 538.7104-3 (GSA Class Deviation RFO-2025-FSS-GSAR 538)

1. Identification of Agency and Contracting Activity:

Agency:
GSA AAS acting in support of GSA Office of the Chief Information Officer

Contracting Activity:
GSA AAS Contracting Office AAS Civilian, Sector 1

2. Nature and/or Description of Action Being Approved:

The Government intends to utilize FAR 52.217-8 to execute the following:

- Base Period - 6/14/2026 - 8/31/2026 (2.5 Months)
- Option Period 1 - 9/1/2026 - 10/31/2026 (2 Months)
- Option Period 2 - 11/1/2026 - 12/13/2026 (1.5 Months)

The initial base extension period shall be from 06/14/2026 through 08/31/2026.The current task order was awarded under the Amazon Web Services (AWS) GSA Multiple Award Schedule (MAS) contract 47QTCA19D000C.

FAR 52.217-8, Option to Extend Services was incorporated into the Task Order but was not evaluated in accordance with FAR 17.202 (a) which states, “prior to awarding the basic contract, the contracting officers must evaluate offers for option quantities or periods included in the solicitation”. As a result this Sole Source Justification provides evidence that the six month option incorporated into the task order award is in the best interest of the Government.

The historical background of this sole-source action is detailed as follows:

- The previous Task Order 47QDCB21F0015 was competitively awarded under MAS 47QTCA19D000C on June 14, 2021 through June 13, 2026
- The contract type of Task Order 47QDCB21F0005 is a combination Fixed Price and firm fixed price per unit task order

The current task order is expiring as GSA plans to restructure this requirement as part of a broader IT strategy and will be recompeted by the Office of Centralized Acquisition Services (OCAS) The length of the FAR 52.217-8 extension period will be for up to 6-months. The dates of period of performance (PoP) will be 6/14/26-12/13/26. At this time, only the base period from 6/14/2026 - 8/31/2026 (2.5 Months) is planned to be exercised as OCAS believes that the new recompete can be awarded within that time frame. However, the client requested for 2 option periods in case unforeseen circumstances arise

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that prevent a timely award of the recompete (i.e. funding, contractual, or phase in issues).

During this FAR 52.217-8 extension period, Amazon Web Services will continue to provide GSA FAS with their required cloud computing platforms supporting on-going maintenance services and development work for 45+ major GSA IT systems, including but not limited to ASSIST, Fleet Modernization, Legacy SAM, SAM.gov, Personal Property Management System (PPMS), SmartPay, and Acquisition Gateway.

3. iii.) A Complete Description of Supplies/Services Required to Meet Agency's Need (Including the Estimated Value):

The not to exceed (NTE) ceiling value of the FAR 52.217-8 extension period will be $22,084,720.00. This dollar value is higher than the previous six months of OY4 due to several projects requiring significant surge support within the next few months of the contract. These surge numbers for the -8 were scaled based on the growing demand and utilization of the ProServ CLIN over Options 3 and 4 to account for future projects and two potential projects currently under discussion in the planning phase (NASA SEWP and NIH system migration to GSA). The addition of the FAR 52.217-8 extension period into the Task Order will increase the aggregate total value of the Task Order from $145,164,994.48 to $167,249,714.48.

The purpose of this requirement is to provide Amazon Web Services for GSA Cloud Service and support services to include optimizing AWS purchases, utilization, and AWS direct support.

4. The Authority and Supporting Rationale:

The acquisition is conducted under the authority of the Multiple-Award Schedule (MAS) Program. Consideration of schedule contractors will be restricted in accordance with:

a. GSAR 538.7104-3(b)(1)(ii)(GSA Class Deviation RFO-2025-FSS-GSAR 538) — Only one source is capable of providing the products, services, or solution required at the level of quality required because the products, services, or solutions are unique or highly specialized;

This Sole Source Justification (SSJ) supports the Government's exercise of FAR 52.217-8, Option to Extend Services, under the current Task Order to ensure uninterrupted delivery of mission-critical IT operations across GSA. This extension provides the Government sufficient time to complete the competitive recompete acquisition, which is currently scheduled for award in the first quarter of FY27. The delay in the competitive recompete was attributed to the internal resolution period required by AAS and OCAS to determine acquisition responsibility.The FAR 52.217-8 extension was incorporated into the contract's terms and conditions at award. Consequently, this contractor is the sole vendor eligible to perform the six month option to extend. This approach ensures continuity of services.

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Although the Option to Extend Services (Nov 1999) (FAR 52.217-8) clause was included in the solicitations and task orders and the prices of the extensions are the same as those of the fourth option periods which were determined to be fair and reasonable at the time of task order award, this extension was not specifically negotiated, identified, and documented in the award recommendation and approval. Therefore, this justification is being executed in compliance with the 2009 determination made by the Government Accountability Office (GAO) which held that the Federal Acquisition Regulation (FAR) clause 52.217-8, Option to Extend Services, must be evaluated as part of the initial competition or the agency must justify the use of noncompetitive procurement procedures in accordance with FAR Subpart 6 before exercising the unevaluated option (Major Contracting (B-401472)). The GAO determination is being implemented by the GSA Assisted Acquisition Service as set forth in "AAS Standard Operation Procedure, Subject: AAS Federal Acquisition Regulation (FAR) 52.217-8, Option to Extend Services, Guide" dated 26 May 2022.This Sole Source Justification (SSJ) supports the Government's exercise of FAR 52.217-8, Option to Extend Services, under the current Task Order to ensure uninterrupted GSA Cloud Service and support services across GSA. This extension provides the Government sufficient time to complete the competitive recompete acquisition, which is currently scheduled for the first quarter of FY 2027.

As the Task Order approaches expiration, the Government intends to exercise FAR 52.217-8 to continue these requirements at the existing contract rates and within the current scope. The FAR 52.217-8 extension was incorporated into the contract's terms and conditions at award. Consequently, this contractor is the sole vendor eligible to perform up to a 6 month extension. This approach ensures continuity of services.

5. Determination by the Ordering Activity Contracting Officer that the Order Represents a Fair and Reasonable Price Consistent with GSAR 538.7102-2(d)(2) and 538.7104-2(a)(3) (GSA Class Deviation (GSA Class Deviation RFO-2025-FSS-GSAR 538)

The cost of the extensions is considered fair and reasonable because all monthly labor rates are extracted directly from Option Year 4 pricing which was determined to be fair and reasonable at the time of task order award. This action was competitively solicited through a competitive negotiation process, which provided adequate technical and price competition. Additionally, the price is determined to be fair and reasonable because it is equal to or less than the prices in the contractor's Multiple Award Schedule price table, which has been determined to be fair and reasonable per FAR 8.404(d). Therefore, the Contracting Officer has determined that the anticipated cost to the Government for this extension is fair and reasonable.

6. Description of the Market Research Conducted Among Schedule Holders and the Results of the Research:

Market research determined that while multiple GSA MAS Schedule contractors are capable of providing AWS as value-added resellers, however , none of them currently possess the incumbent's institutional knowledge and system-specific experience with the GSA AWS environment.

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The incumbent contractor has performed these services over an extended period and has developed detailed familiarity with the applications, their technical architecture, and their operational interdependencies. This knowledge is critical to sustaining uninterrupted service delivery. Given the complexity of the environment and the limited time remaining prior to the expiration of the current Task Order, another contractor could not reasonably assume responsibility for these systems without a substantial transition period that would risk disruption to ongoing operations.

Accordingly, market research supports the conclusion that only the incumbent contractor is capable of maintaining uninterrupted AWS support during the FAR 52.217-8 extension period.

7. <u>Any Other Facts Supporting the Justification</u>:

(a) Procurement History.

1) Amazon Web Service's performance has been satisfactory throughout all periods of task order performance. Performance is considered highly acceptable and provides no basis for terminating this effort.
2) Competitive status of the current contract: The current task order was competitively awarded, following receipt and evaluation of six competing offerors, with a base year and four option years.

(b) Current Situation - Reason for the Requested Extension: The client has requested the use of the FAR 52.217-8 extension of services clause to ensure continuity of services. The current task order is in the OY4 and final period of performance, scheduled to complete on June 13, 2026. The establishment of a new, competitive procurement is underway but due to the complexity, volume, and dollar value associated with it, the anticipated award date will not begin until the first quarter of FY27. Due to the timeline of this new acquisition, FAS OCIO has requested that FAR Clause 52.217-8 be implemented as any disruption in services would be detrimental to the mission of all supported programs and daily operations.

This is GSA's contract directly with Amazon Web Services (AWS) on which mission critical systems are developed and hosted. The objective of this contract is to provide Amazon Web Services, a cloud service which provides GSA FAS with the required cloud computing platforms. A failure to extend this task order would delay key milestones of required on-going maintenance services and development work for 45+ major GSA IT systems, including but not limited to ASSIST, Fleet Modernization, Legacy SAM, SAM.gov, Personal Property Management System (PPMS), SmartPay, and Acquisition Gateway, resulting in non-compliance with federal requirements and impact on public facing websites and internal GSA systems.Not meeting this deadline to extend the period of performance will have significant impact to GSA Systems hosted within FAS Cloud Services (FCS) and the Technology Transformation Service

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(TTS) causing potential loss of revenue, strained relationships with customers, operational disruptions, legal complications and/or damage to GSA reputation.

8. Statement of the Actions, if Any, the Agency May Take to Remove or Overcome any Barriers that Led to the Restricted Consideration Before Any Subsequent Acquisition for the Supplies or Services is Made:

A subsequent competitive acquisition is currently being developed and prepared for execution with an anticipated award date of first quarter FY27. The requirement is being transferred to Office of Centralized Acquisition Services (OCAS) as part of a workload rebalancing effort. The FAR 52.217-8 Extension will ensure uninterrupted service for GSA while providing time to prepare and execute the OCAS acquisition.

9. Contracting Officer Certification that the Justification is Accurate and Complete to the Best of the Contracting Officer's Knowledge and Belief:

I hereby certify that this Justification is accurate and complete to the best of my knowledge, and I determine on the basis of the findings above that the limited sources approach is in accordance with the requirements and is in the best interest of the Government.

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Amanda Ayers
Contracting Officer, AAS Civilian
Assisted Acquisition Services

Date

10. Evidence that any Supporting Data that is the Responsibility of Technical or Requirements Personnel and Which Form a Basis for the Justification Have Been Certified as Complete and Accurate by the Technical and Requirements Personnel:

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Electra Holmes
GSA COR

Date

11. Written Determination by Approving Official Identifying the Circumstance that Applies: I hereby certify that this justification is accurate and complete to the best of my knowledge, and I determine on the basis of the findings above that exercising the six-month option period, as already incorporated in the contract's terms and conditions under FAR 52.217-8, is in accordance with the requirements and is in the best interest of the Government.

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Amanda Ayers
Contracting Officer, AAS Civilian
Assisted Acquisition Services

Date

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12. <u>Reviews/Approvals I have reviewed this justification and I have determined to the best of my knowledge and belief, based on the information contained herein, that it complies with all applicable policies and regulations.</u>

Reviewed by:

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Amanda Ayers
Contracting Officer, AAS Civilian
Assisted Acquisition Services

Date

Reviewed for Legal Sufficiency:

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Ann Edmonds
Legal Counsel, AAS Civilian
Assisted Acquisition Services

Date