JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION
10 U.S.C. § 3204
Overhaul of Rotary Wing and Rotary Rudder Blades
Solicitation Number: 70Z03826RJ0000001

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by the Federal Acquisition Regulation (FAR) 6.103 (FAR Class Deviation 25-11) and in accordance with the requirements of FAR 6.104 (FAR Class Deviation 25-11), the justification for the use of the statutory authority under FAR 6.103 (FAR Class Deviation 25-11) is justified by the following facts and rationale required under FAR 6.104-1 (FAR Class Deviation 25-11) as follows:

1. Agency and Contracting Activity.

The Department of Homeland Security, United States Coast Guard (USCG), Aviation Logistics Center (ALC), Medium Range Recovery (MRR) Product Line Division.

2. Nature and/or Description of the Action being Approved.

(a) Nature of the action: The USCG intends to procure on a sole source basis, a contract for the overhaul of the Rotary Wing Blades and Rotary Rudder Blades, hereafter referred to as "Blades" for use on the MH-60T aircraft. These components are manufactured by the Original Equipment Manufacturer (OEM), Sikorsky Aircraft Corporation (Sikorsky), who is the only Naval Supply Weapons Systems Support (NAVSUP WSS) approved source capable of meeting this requirement. These Blades are required for outfitting the USCG aircraft with the latest design/drawing revision authorized on the MH-60T. This requirement will be solicited utilizing FAR Part 12 Acquisition of Commercial Items and FAR Part 15, Contracting by Negotiation.

(b) Name and address of the contractor:
Sikorsky Aircraft Corporation (Sikorsky)
Cage Code: 78286
6900 Main Street
Stratford, CT 06615-9129

(c) Type of action: The USCG intends to award a Firm Fixed-Price (FFP) Indefinite Delivery Requirements type contract consisting of one (1), one (1) year Base Period, and two (2), one (1) year Option Periods. The Blades will be overhauled through individually funded FFP delivery orders.

(d) Estimated total value (including options): [redacted] broken down as follows:

Period		Total
Base Period	12 mo.	[redacted]
Option Period One	12 mo.	[redacted]
Option Period Two	12mo.	[redacted]
	Total Estimated	[redacted]

**Rounded to the nearest dollar*

(e) Type of funding: Operations and Support (O&S) funds.

(f) Year of funding: Fiscal Years 2026-2029 funds will be used, as applicable to the period of performance of each individually funded delivery order.

(g) Solicitation number: 70Z03826RJO000001

(h)Background information about the requirement:
The overhaul of Blades under this justification were previously awarded under the current Contract, 70Z03824DJ0000002, on 10/19/2023. This contract was awarded to Sikorsky Aircraft Corporation in the amount of $42,302,959. This contract is an Indefinite Delivery Requirements type contract with FFP consisting of a one (1) year Base Period, and two (2), one (1) year Option Periods. The period of performance began 10/19/2023 and is set to expire on 10/18/2026.

3. Description of Supplies/Services.

Four (4) Main Rotor Blades provide lift for the helicopter. The Main Rotor Blades receive power from the Main Rotor Head to which they are attached. The root (inboard end of the Main Rotor Blade) allows bolting the Main Rotor Blades to the Main Rotor Head. A heater mat in the Main Rotor Blade leading edge provides blade deicing and is connected to the blade deicing system. The Tail Rotor is a bearingless, controllable pitch, crossbeam type system. The Tail Rotor Blades are built around two (2) interchangeable graphite composite spars which cross each other at their center. The two (2) Tail Rotor Blades are retained on the Tail Rotor Hub by a set of retention plates. These plates bolt the Tail Rotor Blades together to form four (4) blades 90-degrees apart. Counterweights are bolted to each Tail Rotor Blade for balancing.

The overhaul services will include inspection, evaluation, and teardown. Blade overhauls provide service life extension and reduce cost and lead time compared to new purchase. The USCG requires that overhauls be performed by a NAVSUP WSS certified source. Sikorsky is the OEM, and the only NAVSUP WSS approved source that can perform the required overhaul services.

Item	Overhaul	Unit oflssue	Contract Total Estimated Quantity
Rotary Wing Blade National Stock Number: 1615-01-158-9679 Part Number: 70150-29100-041	Minor	Each	420
	Major	Each	360
	Scrap/BER/TT&E Fee	Each	150
	Strip and Rebuild	Each	120
Rotary Rudder Blade National Stock Number: 1615-01-158-9678 Part Number: 70101-31000-046	Minor	Each	360
	Major	Each	270
	Scrap/BER/TT&E	Each	180

4. Identification of Statutory Authority Permitting Other Than Full and Open Competition.

The statutory authority permitting other than full and open competition is 10 U.S.C. 3204(a)(l) as implemented by FAR Subpart 6.103-1 (FAR Class Deviation 25-11) entitled "Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements."

5. Identification of Exception to the Buy American Act.

The nonavailability exception to the Buy American Statute does not apply to this requirement.

6. Demonstration that the Proposed Contractor's Unique Qualifications or the Nature of the Acquisition Require Use of the Authority Cited.

(a) Rationale for using the authority cited in section 4 of the J&A.
The specifications, manufacturing drawings, data, test equipment, and tooling required for the overhaul of the components under this justification are proprietary to the OEM, Sikorsky. The USCG did not purchase rights to the proprietary data required to foster a competitive environment as part of any original provisioning for use on the MH-60T aircraft and the cost to procure this data would be cost prohibitive. There are no other overhaul facilities authorized by the OEM.

(b) Details covering what events lead to the situation requiring use of other than full and open competition procedures including whether any portion of the work can be segregated to allow for competition:
Sources Sought Notice (SSN), 70Z03824IJ0000047, was posted at SAM.gov on 06/24/2024 with a closing date of 07/01/2024, in efforts to identify other potential overhaul facilities. No responses were received as a result of this posting. Communication with the Navy identified Sikorsky as the only approved overhaul facility. Communication with Sikorsky confirms that they are the OEM of the Blades, and all technical data to overhaul the Blades is proprietary to them, and there are no other authorized overhaul facilities. Therefore, Sikorsky is the only source authorized to overhaul the components in this requirement. Given this information, no portion of the work can be segregated to allow for competition.

(c) Summarize alternatives considered and why they will not work:
The USCG is not seeking alternatives as this is a requirement for overhauls to be performed on components already in use on the MH-60T aircraft. MRR Engineering has stated that these are the only Blades qualified for use on the MH-60T aircraft and there are no other options as the USCG does not possess the technical data to qualify another one. Given this information, alternatives cannot be considered.

(d) Impact to the mission that would result if the J&A is not approved and, consequently, the product or service not provided.
Failure to approve this sole source J&A will jeopardize performance of the USCG's mission due to grounding of the aircraft as a result of no stock being available as the Blades are required.

(e) Rationale for use of the nonavailability exception to the Buy American statute, including detailed information explaining why the particular articles, materials, or supplies of the class or kind to be acquired, either as end items or components, are not mined, produced, or manufactured in the United States in sufficient and reasonably available commercial quantities and of a satisfactory quality.
The nonavailability exception to the Buy American Statute does not apply to this requirement. Therefore, the Buy American Statute will be included in the solicitation and terms and conditions of this requirement.

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7. **Description of Efforts Made to Ensure that Offers are Solicited from as Many Potential Sources as is Practicable.**

(a) If an announcement has already been made in SAM.gov, provide the date of publication:
Not applicable as no announcement has been made in SAM.gov.

(b) If an announcement is being planned for posting in SAM.gov, provide the estimated date of publication.
This justification for Other Than Full and Open Competition (J&A) will be posted to the GPE website, SAM.gov with an anticipated posting date of O1/30/2026. Any capability statement, proposal or quotation received in response will be considered prior to the award.

(c) If an announcement will not be published, identify the applicable exception under FAR 5.202.
Not applicable.

8. **Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable.**

The Contracting Officer anticipates that prices will be determined fair and reasonable based on comparison of the proposed prices found reasonable on previous procurements in accordance with (IAW) FAR 15.404-l(b)(2), comparison with similar items in a related industry IAW FAR 15.404-l (b)(4), and comparison to the IGCE IAW FAR 15.404-l(b)(5).

9. **Description of Market Research.**

(a) Describe the market research techniques used, results, date when the market research was conducted, and how it was used by the contracting officer to determine price reasonableness.
Market research has been conducted in accordance with FAR Part 10 from March 2024-October 2025. DHS APFS entries were reviewed and there were no pre-existing entries found. SSN, 70Z03824IJ0000047, was posted at SAM.gov on 06/24/2024 in efforts to identify potential vendors. No responses were received for this posting. A review of the Asset Maintenance Management Information System (AMMIS) database history was conducted. Government databases such as General Services Administration (GSA), Federal Logistics Information System Web Search (WebFLIS), and FedMall were all reviewed as a part of market research. Commercial databases such as the Inventory Locator Service (ILS) website were also reviewed. Existing DHS-wide and multi-component contract vehicles with DHS Strategic Sourcing Program Office and/or on DHS Enterprise-wide Contract Vehicle Portal were reviewed on 04/02/2025 and were out of scope of this requirement. Communication with the Navy identified Sikorsky as the only authorized source. Communication with Sikorsky confirmed they are the OEM, all information regarding specifications, drawings, data, test equipment and tooling are proprietary to them, and there are no other authorized overhaul facilities.

(b) Describe the market research results that support the determination that the items are nonavailable.
This requirement does not include the exceptions at FAR 25.103(b)(2) or FAR 25.202(a)(2).

(c) If market research was not conducted, state why.
Market research was conducted IAW FAR Part 10 from March 2024 - October 2025.

(d) If patents, copyrights, and/or intellectual property are applicable to the acquisition, describe the circumstances for acquiring a patented or copyrighted product on the representation of the intellectual property holder that has not been licensed for resale.
Patents, copyrights, and/or intellectual property are not applicable to this requirement.

10. Any Other Facts Supporting the Use of Other Than Full and Open Competition.

(a) An explanation why technical data packages, specifications, statement of work, or purchase descriptions are not suitable for full and open competition.
Sikorsky owns all specifications, drawings, data, test equipment, and tooling required to overhaul the Blades. The USCG does not have rights to the proprietary data, and it is cost prohibitive to obtain.

(b) Discuss why your requirement cannot be modified to enhance competition:
Due to the flight critical nature of these Blades, any deviation from the use of certified sources could result in a safety flight risk. Any repair, overhaul, or modification must conform to the design data and quality requirements, or an unsafe condition could result which may cause damage to or loss of assets and significant injury or loss of life. The Blades must meet all form, fit, and function requirements specified in NAVAIR and OEM repair manuals. Therefore, this requirement cannot be modified to enhance competition.

(c) For a proposed contract subject to the restrictions of FAR 6.103-1 (FAR Class Deviation 25-11) for follow-on acquisitions as described in 6.103-1(c)(2)(i) (FAR Class Deviation 25-11), provide an estimate of the cost to the Government that would be duplicated and detailed information on how the estimate was derived.
This requirement is not subject to the restrictions of FAR 6.103-1 (FAR Class Deviation 25-11) as described in 6.103-l(c)(2)(i) (FAR Class Deviation 25-11).

(d) For a proposed contract subject to the restrictions of FAR 6.103-2(c) (FAR Class Deviation 25-11) or HSAR 3006.103-2(c)(70) (HSAR Class Deviation 25-01) and where FAR 6.103-2 (FAR Class Deviation 25-11) is cited as the authority, describe the exceptional circumstances allowing for an award for a period of performance in excess of the one-year limitation (applicable to all federal agencies) or the DHS-specific statutory 150-day limitation.
This requirement is not subject to the restrictions of FAR 6.103-2(c) (FAR Class Deviation 25-11) or Homeland Security Acquisition Regulations (HSAR) 3006.103-2(c)(70) (HSAR Class Deviation 25-01).

11. A Listing of the Sources, if Any, that Expressed, in Writing, an Interest in the Acquisition.

To date, there have been no other sources that have expressed interest in this requirement.

12. A Statement of the Actions, if **Any, the Agency May Take to Remove or Overcome Any Barriers to Competition Before Any Subsequent Acquisition for Supplies or Services Required.**

(a) Will the Government revise overly technical specifications, acquire data rights, etc.?
The USCG did not purchase rights to the proprietary technology required to foster a competitive environment as part of any original provisioning for use on the MH-60T aircraft because it is proprietary to the OEM, Sikorsky. Sikorsky is the only NAVSUP WSS approved source for the overhauls under this justification. The USCG will continuously conduct market research to ensure that companies interested in doing business with the USCG are given every opportunity to compete for future USCG requirements. These efforts will include continuing to identify additional sources that may eventually become NAVSUP WSS approved.

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(b) When a J&A is issued for the purposes of acquiring goods or services while a competitive procurement is being conducted, the justification should include a detailed timeline for completion of the competitive procurement. The period of performance for the sole source action should fairly balance the time needed to complete the competitive procurement. The focus should be on minimizing the need for additional sole source awards.
Not applicable.

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13. Contracting Officer's Certification.

I certify that the data supporting the recommended use of other than full and open competition is accurate and complete to the best of my knowledge and belief.

[redacted]

_____
Date

14. Technical/Requirements Personnel Certification.

I certify that this requirement meets the Government's minimum need and that the supporting data, which forms a basis for the justification, is accurate and complete.

[redacted]

_____
Date

15. Recommended for Approval.

[redacted]

_____
Date

[redacted]

_____
Date

[redacted]

_____
Date

16. Approval.

[redacted]