JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION
10 U.S.C. § 3204
Overhaul of Spindles, Modulation Valves, Bifilar Assemblies, Hubs and Retention Plate Assemblies

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by the Federal Acquisition Regulation (FAR) Subpart 6.3, the following facts and rationale justify the use of such authority:

1. **Agency and Contracting Activity.**

   The Department of Homeland Security (DHS), 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 solicit and award, on a sole source basis, a contract for the overhaul/modify of Spindles, Modulation Valves, Bifilar Assemblies, Hubs, and Retention Plate Assemblies, hereafter referred to as "various components" utilized on the MH-60T aircraft. The various components are overhauled/modified by the Original Equipment Manufacturer (OEM), Sikorsky Aircraft Corporation (Sikorsky, Cage Code: 78286) (see Attachment 1). This requirement will be solicited utilizing FAR Part 12 Acquisition of Commercial Products and Commercial Services and FAR Part 15 Contracting by Negotiation.

   (b) Name and address of the contractor:
   Sikorsky Aircraft Corporation (Sikorsky)
   6900 Main Street
   Stratford, CT 06614
   Cage Code: 78286

   (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 overhaul/modify will be funded through individually FFP delivery orders.

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

Period	Length of Period	[redacted]
Base Period	12 mo.	
Option Period 1	12 mo.	
Option Period 2	12 mo.	
	Total	

**All totals have been rounded to the nearest dollar*

Note: The overhaul/modify services for the various components under this justification were previously awarded under contract 70Z03821DJ0000007, with a period of performance end date of 06/16/2026.

(e) Type of funding: Operations and Support (O&S) and Procurement Construction and Improvement (PC&I) 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: 70Z03825RJ0000008

(h) Background information about the requirement:
This requirement is for the overhaul/modification of various components utilized on the MH-60T aircraft. Currently, the USCG is utilizing previously awarded Contract, 70Z03821DJ0000007, to Sikorsky on 06/17/2021 with a total award amount of $5,612,270. This contract has a period of performance (POP) of 06/17/2021 – 06/16/2026. The reason for the substantial monetary increase from previously awarded Contract, 70Z03821DJ0000007 is due to an increase in the estimated quantity over the entirety of the follow-on requirement to account for growth of the MH-60T fleet from fifty-six (56) aircraft to one hundred and twenty-seven (127) aircraft as well as sustainment of the current aircraft.

3. Description of Supplies/Services.

This overhaul/modify requirement will provide replacement Ready for Issue (RFI) components for the fleet and programmed depot maintenance. The overhaul/modification of these various components is necessary for the operational needs of the MH-60T rotor head. Rotors and ancillary components aid in the creation of lift for flight and forward movement of the aircraft.

These components are interchangeable throughout the MH-60T fleet and considered Flight Critical Safety Item (CSI) parts. A CSI is a part, assembly, installation, or production system with one or more critical characteristics that, if not conforming to the design data or quality requirements, would result in an unsafe condition. Unsafe conditions relate to mishap severity categories I (catastrophic) and II (critical) and include conditions which could cause loss or serious damage to the end item or major component, loss of control, serious injury to personnel, or death of personal. In order to successfully maintain the airworthiness of the aircraft and the aircraft systems, protect personnel safety, and perform the USCG's mission, acquisition of CSIs is restricted to approved sources. Components procured from unauthorized sources may result in dangerous conditions and compromise the integrity of the aircraft thereby creating a safety flight risk, a safety flight risk is never acceptable.

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Nomenclature	Service	National Stock Number	Part Number	Unit of Issue	Estimated Total Contract Quantity
Spindle ASSY. BL/MOD	Overhaul	1615-01-HS1-4256	70102-28100-054	EA	60
Spindle ASSY. BL/MOD	Overhaul/ Modification	1615-01-238-2444 **Modify to:** 1615-01-HS1-4256	70102-28100-046 **Modify to:** 70102-28100-054	EA	60
Spindle ASSY. RE/MOD	Overhaul	1615-01-HS1-4257	70102-28100-053	EA	60
Spindle ASSY. RE/MOD	Overhaul/ Modification	1615-01-238-2442 **Modify to:** 1615-01-HS1-4257	70102-28100-045 **Modify to:** 70102-28100-053	EA	60
Spindle ASSY. YE/MOD	Overhaul	1615-01-HS1-4258	70102-28100-055	EA	60
Spindle ASSY. YE/MOD	Overhaul/ Modification	1615-01-238-2446 **Modify to:** 1615-01-HS1-4258	70102-28100-047 **Modify to:** 70102-28100-055	EA	60
Spindle ASSY. BK/MOD	Overhaul	1615-01-HS1-4259	70102-28100-056	EA	60
Spindle ASSY. BK/MOD	Overhaul/ Modification	1615-01-238-2448 **Modify to:** 1615-01-HS1-4259	70102-28100-048 **Modify to:** 70102-28100-056	EA	60
Bifilar Assembly	Overhaul	1615-01-221-2610	70107-28400-043	EA	45
HUB SUB-Assembly	Overhaul	1615-01-HS1-4524	70070-10046-057	EA	30
HUB SUB-Assembly	Overhaul	1615-01-158-9589	70103-28012-041	EA	15
HUB SUB-Assembly	Overhaul	1615-01-441-0836	70103-28012-043	EA	15
Accumulator, HYDRAUL	Overhaul	1650-01-158-9683	70103-28041-042	EA	30
Plate Assembly, RETE	Overhaul	1615-01-185-4870	70102-11101-043	EA	75
Swashplate ASSY	Overhaul	1615-01-221-2615	70104-08000-048	EA	75
Flange/Coupling	Overhaul	1615-01-527-0355	70351-08255-102	EA	75
Dampener, VIBR, DR SH	Overhaul/ Modification	1615-01-347-0735 **Modify to:** 1615-01-604-7562	70106-28000-048 **Modify to:** 70106-28000-049	EA	60
Dampener, VIBR, DR SH	Overhaul	1615-01-604-7562	70106-28000-049	EA	30
Dampener, Flutter	Overhaul	1650-01-285-3024	70106-08100-046	EA	300

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. 2304(c)(1) as implemented by FAR Subpart 6.302-1 "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 Statue 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/modification of the various components are proprietary to the OEM, Sikorsky. The USCG did not purchase the right to the proprietary data required to foster a competitive environment as part of any original provisioning for use on the MH-60T aircraft. There are no

alternate sources or authorized overhaul facilities available to meet the Government's requirements. Therefore, responsible sources are limited to the OEM, Sikorsky.

(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:
The United States Naval Supply Weapons System Support (NAVSUP WSS) is the primary Inventory Control Agency and has sole authority and responsibility for certifying sources for overhaul/modification and support for MH-60T components. Sources must have access to the OEM technical data to properly perform overhauling and modifying non-ready for issue components. Non-approved sources overhauling/modifying the components may result in dangerous conditions and compromise the integrity of the aircraft thereby creating a safety flight risk. A safety flight risk is never acceptable, therefore, no alternate vendors other than NAVSUP WSS approved sources will be considered for this requirement.

This requirement includes parts that are considered flight Critical Safety Item (CSI) parts. To successfully maintain airworthiness of the aircraft and the aircraft systems, protect personnel safety, and perform the USCG's mission, acquisitions of CSIs is restricted to the OEM. A CSI is a part, assembly, installation, or production system with one or more critical characteristics that, if not conforming to the design data or quality requirements, would result in an unsafe condition. Unsafe conditions relate to mishap severity categories I (catastrophic) and II (critical) and include conditions which could cause loss of serious damage to the end item or major component, loss of control, serious injury to personnel, or death to personnel. Therefore, Sikorsky is the only NAVSUP WSS approved source that is also the OEM.

(c) Summarize alternatives considered and why they will not work;
Due to the critical aspect of the various components, alternatives cannot be considered. The USCG can only consider the OEM for the support of the overhaul/modification of the various components. Therefore, 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.
If this justification is not approved, the lack of parts would cause a severe degradation in the USCG's ability to conduct search and rescue, law enforcement, international ice patrol, marine environmental protection, and marine resource conservation, and various other missions.

(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 both 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:
This procurement forecast is posted at DHS – Acquisition Planning Forecast System (APFS) F2025068810 was published on 04/07/2025 at http://apfs.dhs.gov, and was included in the DHS Forecast of Small Business Opportunities.

(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 estimated posting date of 07/18/2025. Any capability statement, proposal or quotation received in response will be considered prior to award.

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

(d) If an announcement will be published after award, cite the applicable exception under FAR 6.305.
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 a combination of price analysis techniques to include FAR 15.404-1(b)(2)(ii), comparison of proposed prices to historical prices paid; FAR 15-404-1(b)(2)(v), comparison of proposed prices with the Independent Government Cost Estimate (IGCE); and/or FAR 15.404-1(b)(2)(vii), analysis of data other than certified cost or pricing data.

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 was conducted in accordance with (IAW) FAR Part 10 from March 2024 – July 2025. DHS APFS entry F2025068810 was published on 04/07/2025 but the USCG did not receive any responses. Sources Sought Notice (SSN), 70Z03824IJ0000046, was issued on 06/24/2024, and expired on 07/08/2024 to identify potential sources and no responses were received. Government databases such as General Services Administration (GSA) and Federal Logistics Information System Web Search (WEBFLIS) were reviewed as part of market research. ALC reviewed commercial databases such as the Inventory Locator Service (ILS) website. 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 and were determined out of scope of this requirement. A review of the Asset Maintenance Management Information System (AMMIS) database history for the various components was conducted and reviewed recent task orders. AMMIS identified various sources of supply for the components, since the components are controlled by the Navy. Correspondence was held with both the Navy and the OEM to confirm approved sources for the overhaul/modification of the various components. Sikorsky responded to the USCG market research questions on 07/22/2025, stating they are the OEM and all drawings, data, test equipment, and tooling are all proprietary to

Sikorsky. Sikorsky also identified one (1) other potential overhaul facility for one (1) of the components via email on 07/22/2025 (see Attachment 1). On 07/16/2025, the Navy identified various approved sources for this requirement (see Attachment 2). The identified sources were Sikorsky, PCX Aerosystems-Manchester LLC, Heroux Devtek Inc, and Goodrich Corporation. The Navy then clarified that the approved sources are not classified in their system by sources for repair, overhaul, or new buys. Therefore, all sources were contacted to determine capabilities. Responses from three (3) of the four (4) approved sources indicated they were not able to overhaul and modify the components within this requirement (see Attachments 3-5). Sikorsky was the only Naval Supply Systems Command Weapon Systems Support (NAVSUP WSS) approved source that was able to fulfill the requirement. They are the OEM and have access to all necessary technical data to perform overhaul/modification work. Given this information, no portion of the work can be segregated to allow for competition.

(b) Describe the market research results that support the determination that the items are nonavailable.
Not applicable as the nonavailability exception does not apply to this requirement.

(c) If market research was not conducted, state why.
Not applicable; market research was conducted from March 2024 - July 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.
All the technological data required to perform the overhauls/modifications are proprietary to Sikorsky as stated via email, dated 07/22/2025 (see Attachment 1), and for the USCG to purchase this data would be cost prohibitive.

(b) Discuss why your requirement cannot be modified to enhance competition.
This requirement cannot be modified to enhance competition because the components and the subsequent technical data is not available from any vendor other than the OEM, Sikorsky, and these overhauls/modifications are critical to mission performance and safety.

(c) For a proposed contract subject to the restrictions of FAR 6.302-1 for follow-on acquisitions as described in 6.302(a)(2)(iii), 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 6.302-1 as described in 6.302(a)(2)(iii).

(d) For a proposed contract subject to the restrictions of FAR 6.302-2(d) or HSAR 3006.302-270 and where FAR 6.302-2 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 6.302-2(d) or Homeland Security Acquisition Regulation (HSAR) 3006.302-270.

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

No sources expressed an interest in writing to the acquisition.

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 does not possess the technical data required to foster full and open competition for the various components covered under this justification and approval. All technological data required to overhaul/modify these components are proprietary to the OEM, Sikorsky. Any authorized overhaul facilities may be considered, however at this time, Sikorsky does not have any other facilities capable of performing the required overhaul/modify services. 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. If other potential sources emerge, and the USCG can obtain the required technical data, the USCG will assess whether competition for any future requirements is feasible.

(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]

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]

15. Recommended for Approval.

[redacted]

16. Approval.

[redacted]