JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION
10 U.S.C. § 3204
Procurement of Various Gearboxes – New Buys
Solicitation 70Z03825RJ0000006

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by the Federal Acquisition Regulation (FAR) Subpart 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) Procurement Branch.

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 procurement of the Main Gearbox, Input Module Gearbox Assembly, Intermediate Gearbox, Tail Rotor Gearbox, and Accessory Drive Gearbox hereafter referred to as "components" for use on the MH-60T aircraft. The Original Equipment Manufacturer (OEM) of the components is Sikorsky Aircraft Corporation (SAC, Cage Code 78286). This requirement will be solicited utilizing FAR Part 12 Acquisition of Commercial Services and FAR Part 15, Contracting by Negotiation.

(b) Name and address of the contractor:

Sikorsky Aircraft Corporation (SAC)
6900 Main Street
Stratford, CT 06614-1378
Cage Code: 78286

(c) Type of action: The USCG intends to award a Firm-Fixed Price (FFP) Indefinite Delivery Indefinite Quantity (IDIQ) type contract consisting of five (5) Ordering Periods. The components will be purchased through individually funded FFP delivery orders.

(d) Estimated total value (including options):

Broken down as follows: (*Rounded to the nearest dollar)

Period		
Ordering Period 1	12 mo.	[redacted]
Ordering Period 2	12 mo.	
Ordering Period 3	12 mo.	
Ordering Period 4	12 mo.	
Ordering Period 5	12 mo.	
Total Estimated Value		

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

(f) Year of funding: Fiscal Year 2026 – 2031 funds will be used, as applicable to the period of performance of each individually funded order.

(g) Solicitation number: 70Z03825RJ0000006

(h) Background information about the requirement:

This requirement is to procure the components that are manufactured by the OEM, SAC to be utilized on the MH-60T aircraft. The Main Gearboxes were awarded under Contract, 70Z03823DJ0000007, to SAC on 02/27/2023 with a total award amount of $3,306,563. This contract has a period of performance (POP) of 02/27/2023 to 02/26/2026. The Input Module Gearbox Assembly has no new buy purchase history. The Intermediate Gearboxes were last purchased under delivery order, HSCG38-11-F-J11044, against Basic Order Agreement (BOA) SPRPA1-11-G-001Y that was awarded to SAC on 08/18/2011. A quantity of three (3) each were purchased at a unit price of $40,588 each obligating a total of $121,764. The Tail Rotor Gearbox was last purchased under delivery order, HSCG38-11-F-J66069, against BOA N00383-06-G-006F that was awarded to SAC on 05/02/2011. A quantity of one (1) each was purchased at a unit price of $69,829 each obligating a total of $69,829. The Accessory Drive Gearboxes were last purchased under purchase order DTCG38-03-P-700357 that was awarded to SAC on 09/25/2003. A quantity of two (2) each were purchased at a unit price of $60,264, each obligating a total of $120,528.

3. Description of Supplies/Services.

The Main Gearbox provides power to the Tail Drive Shaft. The Tail Drive Shaft then provides power through the Intermediate Gearbox to the Tail Gearbox. The Tail Gearbox converts Tail Drive Shaft rotation from the Pylon Shaft to turn the Tail Rotor Blades. The Intermediate Gearbox provides revolutions per minute (RPM) reduction and drive angle change. It contains two spiral bevel gears in a partially oil-filled housing. Torque is transmitted from the Tail Drive Shaft to the Tail Pylon Drive Shaft. The Accessory Module provides a mechanical drive to a Hydraulic Pump Module and an Electrical Generator. The two (2) accessory Modules are identical and interchangeable.

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 personnel. 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	National Stock Number (NSN)	Part Number (P/N)	Unit of Issue (U/I)	Estimated Total Contract Quantity
Main Gearbox	1615-01-552-3522	70351-38100-049	EA	93
Input Module Gearbox Assy	1615-01-527-8175	70351-80001-050	EA	114
Intermediate Gearbox	1615-01-201-5623	70357-06300-043	EA	74
Tail Rotor Gearbox	1615-01-372-5467	70358-26600-045	EA	122
Accessory Drive Gearbox	1615-01-383-8992	70351-08080-045	EA	137

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)(1) as implemented by FAR 6.103-1 (FAR Class Deviation 25-11) entitled "Only One Responsible Source and No Other Supplies 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 manufacture of these components are proprietary to the OEM, SAC. 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 costs to procure this data would be cost prohibitive. No alternate part numbers can be utilized.

(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), 70Z03824IJ0000065, was posted at SAM.gov on 09/18/2024 with a closing date of 10/03/2024, in efforts to identify potential vendors. No responses were received as a result of this posting. The components must be acquired directly from the OEM, SAC. SAC holds the proprietary data and has the specifications, drawings, data, test equipment, and tooling to manufacture these components. MRR Engineering has stated via an email dated 10/04/2024, that due to these components being flight critical and SAC owning all the technical data, there are no alternate parts or authorized vendors. Therefore, SAC is the only source capable of providing the components for this requirement. Given this information, no portion of this requirement can be segregated to allow for competition.

(c) Summarize alternatives considered and why they will not work:
The components of this requirement must have a clear, documented traceability to the OEM, SAC. Correspondence with MRR Engineering via email dated 10/04/2024, confirmed that due to these components being flight critical, there are no alternate parts or authorized distributors. As the OEM, SAC stated via email dated on 10/17/2024, that they hold the proprietary data and has the specifications, drawings, data, test equipment, and tooling to manufacture these components. Given this information, it has been determined this requirement will be sole source to the OEM, SAC.

(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 components 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.

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 SAM.gov with an anticipated posting date of 10/31/2025 and closing date of 12/15/2025. 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.
There are no applicable exceptions, and an announcement will be published.

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

The Contracting Officer anticipates prices will be determined fair and reasonable. This will be based on comparison of the proposed prices found reasonable on previous procurements in accordance with (IAW) FAR 15.404-1(b)(2)(ii), comparison with similar items in a related industry IAW FAR 15.404-1(b)(2)(vi), and comparison to the IGCE IAW FAR 15.404-1(b)(2)(v).

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 FAR Part 10 from September 2024 through June 2025. This procurement forecast is posted as DHS – Acquisition Planning Forecast System (APFS) No: F2024068265 was published on 04/07/2025 at http://apfs.dhs.gov. DHS APFS entries were reviewed and

there was no pre-existing entries found. SSN, 70Z03824IJ0000065, was posted at SAM.gov on 09/18/2024 with a closing date of 10/03/2024 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 Federal Logistics Information System Web Search (WebFLIS) and SAM.gov, Contract Opportunities/Entity Information were all reviewed as part of the market research. Commercial databases such as Inventory Locator Service (ILS) and USCASpending.gov 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. Correspondence with SAC confirmed that SAC is the OEM. SAC also confirmed that they hold all the proprietary data, has the specifications, drawings, data, test equipment, and tooling to manufacture these components and there are no authorized distributors. Therefore, SAC is the only source capable of providing the required components.

(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.
Market research was conducted IAW FAR Part 10 from September 2024 through June 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.
SAC owns all the specifications, drawings, technical data, test equipment and tooling required to manufacture these components and is proprietary to them. 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.
This requirement cannot be modified to enhance competition because the components and the subsequent technological data are not available from any vendor other than the OEM, as well as any risk increased to flight safety is never acceptable.

(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 6.103-1(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 Regulation (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, SAC. Only one (1) source is able to procure these components of this requirement approved by ALC MRR Engineering. Every reasonable effort will be made to remove barriers to competition for future requirements. These efforts will include continuing to identify additional sources that may eventually become approved by ALC MRR Engineering.

(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

[redacted]

Date

16. Approval:

[redacted]