[redacted]

Memorandum for Record – Limiting Competition at or below the Simplified Acquisition Threshold

1. **Requiring Activity:** III Armored Corps (IIIAC), Fort Hood, TX

2. **Contracting Activity:** 418th CSB, Fort Hood, TX

3. **Description of Action:**

Nature of Requirement: ☒ New ☐ Follow-on ☐ Extend

Brand Name: ☒ Yes ☐ No

Contract Vehicle: ☒ Purchase Order
☐ Blanket Purchase Agreement (BPA)
☐ Order/BPA against FSS Contract #_____
☐ Order against multiple award IDIQ Contract
☐ Order against a single award IDC Contract
☐ Modification to existing PO/TO/DO/Call Order

Pricing/Contract Type: ☒ Fixed Price
☐ Cost Reimbursable

Funds: FY: ___2026____
☒ Operations & Maintenance, Army (OMA)
☐ Other Funds: _____

Name of Proposed Contractor(s) and Address:
Multiple Vendors

4. **Description of Services or Supplies:**

Make & Model: One (1) Xact Metal XM200G µHD

Description: This is a direct metal laser powder-bed fusion (LPBF) 3D printer. It is uniquely engineered to print with ultra-fine metal powders (5-15 µm) and utilizes a high-resolution 25 µm laser spot size. This enables the fabrication of high-resolution micro-mechanics, waveguides, and other components with fine features that cannot be produced on standard LPBF systems. The system also includes an open material and open parameter platform, allowing for the use of third-party powders and full user control over printing parameters without additional licensing fees.

[redacted]

Item	Quantity	Delivery Date	[redacted]
Xact Metal XM200G	1	90 Days ARO	

5. Authority: Select the appropriate authority below:

☒ FAR 12.201-1 For commercial acquisitions valued at or below the simplified acquisition threshold

Limiting Sources when Ordering under the Federal Supply Schedule
☐ GSAM 538.7104-3(b)(1)(i) - Urgency
☐ GSAM 538.7104-3(b)(1)(ii) - Only One Source is Capable
☐ GSAM 538.7104-3(b)(1)(iii) - Logical Follow-on
☐ GSAM 538.7104-3(b)(1) (iv) - Satisfy minimum guarantee
☐ GSAM 538.7104-3(b)(1) (v) - Authorized or required by statute
☐ GSAM 538.7104-4 - Items peculiar to one manufacturer

Exceptions to Fair Opportunity
☐ FAR 16.507-6(b)(1) - Unusual and urgent need
☐ FAR 16.507-6(b)(2) - Only One Awardee is Capable
☐ FAR 16.507-6(b)(3) - Logical Follow-on
☐ FAR 16.507-6(b)(4) - Minimum Guarantee
☐ FAR 16.507-6(b)(5) - Statute Authorizes / Requires Purchase from Specified Source
☐ FAR 16.507-6(b)(6) - Satisfies Exception under FAR 6.103
☐ FAR 16.507-7 - Items peculiar to one manufacturer

6. Reasons for Authority Cited:

a. The Xact Metal XM200G is the only system capable of meeting the Government's minimum technical and operational requirements for point-of-need metal additive manufacturing. The XM200G provides true Direct-to-Density Laser Powder Bed Fusion (LPBF) printing, producing fully dense, structural parts directly from the build chamber. Competing systems rely on a multi-step "print, debind, and sinter" workflow that introduces unacceptable dimensional shrinkage, higher porosity, and a three-machine footprint that is incompatible with tactical deployment. The XM200G is also uniquely engineered for high-resolution micro-feature production using 5–15 µm powder and a significantly smaller laser spot size than standard commercial printers, which cannot achieve the micro-high-definition resolution required for precise military replacement components.

Additionally, the XM200G provides an open-material and open-parameter ecosystem, allowing the Government to adjust laser parameters and utilize cost-effective third-party powders without voiding warranties. Other OEMs impose restrictive proprietary

software, subscription controls, and powder lock-in that prevent the Government from meeting cost, flexibility, and sustainment requirements. The XM200G is also the only system explicitly authorized under the Joint Manufacturing and Technology Center (JMTC) and Technical Bulletin (TB) 43-0249, Fabrication, Additive Manufacturing of Metallic Components, for printing final-use replacement parts; alternative brands are limited to prototyping and cannot legally support the mission requirement.

Interoperability is another critical factor. Sister units, including those at Fort Bliss, have already produced over 100 validated parts using the XM200G. Procuring the same brand enables immediate reuse of existing Technical Data Packages (TDPs) and print parameters without re-certification, saving significant time and cost. Finally, the XM200G is verified compliant with NDAA 2026 sourcing requirements, mitigating supply-chain security risks present in other commercial systems. For these reasons, the XM200G is the only brand that satisfies the Government's essential technical, operational, and regulatory requirements.

b. Disapproval of this brand-name restriction would result in serious injury to the mission and substantial financial loss to the Government. If forced to procure a non-authorized system, the requiring activity would be prohibited under JMTC and TB 43-0249 from producing final-use replacement parts, limiting the equipment to prototyping only and eliminating point-of-need manufacturing capability. This would force continued reliance on traditional supply chains, increasing downtime and reducing readiness in contested or delayed logistical environments.

Financially, acquiring an alternative brand would isolate the unit from existing XM200G-based DoD manufacturing efforts, requiring complete re-engineering, re-validation, and safety testing of all existing TDPs to fit a different OEM's proprietary ecosystem—rendering current DoD print files unusable and driving significant duplication of effort. Operational readiness would also be severely degraded. Without the ability to rapidly produce structurally dense, authorized replacement parts, equipment availability rates would decline, directly impacting mission capability.

Furthermore, selecting a non-LPBF system would require procuring and transporting three separate machines—printer, debinder, and sinter—rather than the XM200G's single-machine footprint. This increased logistical burden would hinder tactical mobility and complicate deployment planning. Collectively, these impacts demonstrate that disapproval would result in substantial mission degradation, financial waste, and operational risk to the Government.

7. Publicizing Contract Actions:

a. The public display and synopsis requirements of FAR 5.101(a) and FAR 5.101(d)
☐ do not apply, less than $20K threshold
☒ apply and will be followed
☐ do not apply due to an exception at FAR 5.101(b)(1)( )

b. Requirement to post justification in accordance with, FAR 12.102(a)(2), GSAM 538.7104-3(a)(3) or FAR 16.507-6(f) unless:

☐ Action is not a brand name restriction and is under SAT, no posting required.

☐ Action is a brand name restriction, under $40K, no posting required.

☐ Action is a brand name restriction over $40K but will not be posted due to the following exception:

☐ FAR 6.301(e)

☐ GSAM 538.7104-3(b)(3)(i)(B)

☐ FAR 16.507-6(f)(4)

8. Market Research: Market research for this requirement was conducted between 4–23 June 2026 by [redacted], Contract Specialist, with technical input from [redacted], the requiring activity representative. The research used multiple techniques to identify all qualified sources and to determine whether any commercial products other than the Xact Metal XM200G µHD could meet the Government's needs. As documented, the team conducted subject-matter interviews with the end user, reviewed Government databases such as SAM.gov and USAspending.gov, and performed targeted web searches of both the OEM and authorized distributors to assess product availability, technical capabilities, and distribution channels. The report states that market research included "reviewing the official websites of the original equipment manufacturer and an authorized reseller…to assess available products, technical capabilities, and distribution channels."

Mandatory sources were screened in accordance with FAR Part 8 and DFARS Part 208, including AbilityOne, Federal Prison Industries, GSA Advantage, and CHESS. None were able to provide an industrial metal laser powder-bed fusion (LPBF) 3D printer, and CHESS issued a formal Statement of Non-Availability confirming no mandatory-use vehicle could meet the requirement. As stated in the report, "none of the available results apply to or can satisfy the requirement for an industrial metal laser powder-bed fusion (LPBF) 3D printer."

To assess commercial availability and potential competition, the contracting office posted a Sources Sought Notice from 4–11 June 2026, which generated [redacted] A GSA eBuy RFI was also issued from 11–17 June 2026 and received zero responses from Federal Supply Schedule holders. The report notes that the Sources Sought "resulted in only one (1) response," and the GSA RFI "yielded zero responses."

Three authorized vendors were identified as capable sources: [redacted]

9. Other Facts: N/A

[redacted]

10. Technical/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.

[redacted]

11. Contracting Officer Certification/Approval: I hereby determine that the anticipated cost or price to the Government for this contract action will be fair and reasonable based upon anticipated competition.

I certify that this justification is accurate and complete to the best of my knowledge and belief, and that completing this purchase as a brand name requirement is in the best interest of the Government. Additionally, I approve this justification to limit competition subject to the availability of funds and provided that the services or supplies herein described have otherwise been authorized for acquisition.

[redacted]

[redacted]