United States Department of the Interior

NATIONAL PARK SERVICE
CONOPS NATIONAL

IN REPLY REFER TO:

SOLE SOURCE JUSTIFICATION
GSAR 538.7104-3(b)(2)

1. This justification utilizes the Revolutionary FAR Overhaul (RFO) as adopted by DOI, referencing GSAR 538.71 as mandated by RFO FAR 8.401(b).

2. The items required to support the agency's needs.

   The Office of Public Trust requires body worn cameras to support law enforcement activities and the mission of keeping the public safe.

   DOI Policy 446 DM 41 mandate that all uniformed law enforcement officers who carry firearms and are engaged in patrol activities must have, carry and utilize body worn camera (BWC) equipment. BWC enhances public trust, increases officer and public safety, bolsters evidence collection, and ensures greater transparency and accountability. The evidence collected from BWC and electronic control weapons must be contained on a FedRAMP High compliant evidence management cloud platform. The use of non-integrated third-party evidence management solutions introduce unacceptable risks to evidentiary integrity, auditability, chain-of-custody management cybersecurity controls, and operational continuity. Third-party transactions break the chain of custody and are not authorized in a law enforcement environment.

   The Office of Public Trust requires body worn cameras which are a part of a hardware to software ecosystem which will support both body worn camera and controlled electronic weapon digital evidence.

   The purchase of body worn cameras supports the lifecycle replacement of hardware.

3. The authority.

   GSAR 538.7104-3(b)(1)(ii) Only one source is capable of providing the products, services, or solution required at the level of quality required because the products and solutions are unique and highly specialized.

4. Independent Government Estimate: $461,240.00

5. The supporting rationale.

   The Government requires an established commercial solution to provide a hardware to software ecosystem solution to support Federal law enforcement operations. Market research was conducted IAW RFO FAR 10 and there is an existing hardware to software ecosystem solution available on GSA which encompasses multiple award schedules (MAS) 334310, 518210C and 332999 which fulfills the requirement of RFO FAR 8.104 Use of Existing Contracts and

Executive Order 14271 Ensuring Commercial, Cost-Effective Solutions in Federal Contracts. There are no suitable "required use" contracts which meet the Government's need IAW RFO FAR 8.104(a)(2).

Although certain components of the requirement may be available through multiple GSA contractors, market research determined that no other contractor can provide the fully integrated hardware to software ecosystem required to support the Government's operational, cybersecurity evidence management, interoperability, and chain-of-custody requirements without substantial duplication of cost and unacceptable operational disruption.

Axon Enterprise has demonstrated a full understanding of the Office of Public Trust's need for a secure, scalable and integrated ecosystem that can support Federal law enforcement operations across diverse jurisdictions and mission environments. Axon has a single, unified platform that enables the management of evidence from capture through case resolution. Axon Evidence is delivered as a FedRAMP High authorized, cloud-native Software as a Service (SaaS) platform hosted within Microsoft Azure Government infrastructure. This method applies layered security controls across data ingestion, storage, access and sharing. Axon Evidence has encryption in transit and at rest using CJIS and NIST aligned standards. Axon Evidence supports multiple ingestions methods such as Body Worn Cameras and TASER energy weapons. Axon demonstrated capabilities such as evidence management, redaction features, auto-transcribe, search abilities, and evidence sharing. Axon demonstrated capabilities in audit trails, evidence tracking, agency settings, user settings, device settings, data security and access controls. A review of Axon's capability statement for the Digital Evidence Management System (DEMS) depicted it meets the Government's requirements. Axon's capability statement provided a detailed explanation of its Axon Body Solution which provides a ruggedized Body Worn Camera (BWC) with integrated LTE, Wi-Fi, and GPS connectivity. The capability statement listed the features of the Axon BWCs, and this hardware and software ecosystem integration meets the Government's requirements. The capability statement listed the features of the TASER, and this hardware and software ecosystem integration meets the Government's requirements.

Market research determined that Axon Enterprise is the only vendor identified that can provide a fully integrated body worn camera, conducted energy weapon, and digital evidence management ecosystem meeting the Government's interoperability, cybersecurity, evidentiary integrity, operational continuity, and FedRAMP high requirement. The Office of Public Trust requires body worn cameras from a single, unified and fully integrated hardware to system solution from a single manufacturer to support the law enforcement and public safety mission. The fundamental purpose of this system is to reliably capture, manage, and secure digital evidence in a manner that ensures its integrity, preserves the chain of custody, and guarantees its admissibility in judicial, civil and administrative proceedings. A multi-vendor approach introduces unacceptable risks related to system integration, data security and operational reliability. The Government currently utilizes Axon-based operational workflows and evidence management processes. Transition to a non-compatible solution would require significant retraining, migration of operational procedures, modification of evidence workflows, increased cybersecurity assessment activities, and potential disruption to ongoing law enforcement operations.

The results of the capability determination have demonstrated that Axon Enterprise is the only vendor who is capable to fulfill our needs for a hardware to software ecosystem solution which is FedRAMP High compliant to support law enforcement operations.

The following Executive Orders and Secretary Orders are applicable to this requirement:

E.O. 14189 – Celebrating America's 250th Birthday
Supports increased transparency and evidentiary readiness during high-visibility public events where BWCs and secure digital evidence systems strengthen public trust.

E.O. 14153 – Unleashing Alaska's Extraordinary Resource Potential
Expanding enforcement in remote and sensitive areas increases the need for reliable BWC documentation and digital evidence management to protect officers and record incidents.

E.O. 14308 – Empowering Commonsense Wildfire Prevention and Response
Interagency wildfire operations rely on standardized, secure evidence handling; BWC footage and digital evidence systems support investigations, after-action reviews, and cross-agency coordination.

E.O. 14252 – Making the District of Columbia Safe and Beautiful
Increased law enforcement operations in the National Capital Region require BWCs and secure evidence management to document incidents, reduce liability, and ensure transparency.

S.O. 3447 – Expanding Hunting and Fishing Access
Increased visitor activity and ranger enforcement workloads create a heightened need for BWCs and digital evidence systems to document encounters and support investigations.

S.O. 3443 – Elevating and Unifying DOI's Wildland Fire Management Program
Public-safety and enforcement operations surrounding wildfire response benefit from secure digital evidence workflows, including BWC footage and chain-of-custody management.

6. Determination of fair and reasonable price:

IAW GSAR 538.7102-2(d)(2) ordering activities are not required to make a fair and reasonable price determination at the order level as Federal Supply Schedule contract pricing has been determined fair and reasonable.

IAW GSAR 538.7104-2(a)(3) fair and reasonable price determination of order level materials is not required prior to award of the order.

7. Certifications:

I certify that any supporting data that is the responsibility of technical or requirements personnel which form a basis for the justification have been certified as complete and accurate:

[redacted]

I certify that the justification is accurate and complete to the best of my knowledge and belief:

[redacted]

Reviewed/Concur/Approved by:

[redacted]