Limited Sources Justification and Approval (J&A)

Contracting Activity: OL:H/PZIMC

Purchase Request / Local ID Number: 10968, 15157, 15199 and 15093

Program / Project (and PE, if applicable)**:** MABSM Follow-on Bridge

Program Type (PEO or Other Contracting)**:** Other

Authority: Multiple Award Schedule Program (**FAR 8.405-6**)

Estimated Contract Cost (including options)**:** [redacted]

Is this a Bridge Action? ☒ Yes ☐ No

Description of Limitation:
Air Force Sustainment Center (AFSC) requires continuation of Maintenance Business System Modernization (MABSM) implementation and sustainment services following the end of the current contract performance period on 9 July 2026. MABSM is a highly unique and specialized Maintenance, Repair, and Overhaul (MRO) application. [redacted] The only contractor that currently possesses this skill set is System Implementers (SI) (CAGE: 1FNW9). The Government plans to award four (4) task orders, plus special projects as they arise, against multiple award schedule (MAS) 47QTCA22D004W, limited to SI, as a bridge to a competitive IDIQ that will include the entire scope of required MABSM services. As all four (4) known task orders will be required to bridge current services, and special projects have historically been a critical component of the MABSM program life cycle, this is a class limited source justification and approval (LSJ&A).

COORDINATION (DAFFARS 5306.304(a))

[redacted]

APPROVAL (DAFFARS 5306.304(a))

[redacted]

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I. Contracting Activity.

USAF AFSC OL:H/PZIMC
6038 Aspen Ave, Bldg 1289
Hill AFB, UT 84056
[redacted]

II. Nature and/or description of the action being processed.

****This Limited Source Justification & Approval (LSJ&A) is an update to the one approved on 25 Feb 2026 for the MABSM GSA Order Bridge effort***

Summary of Changes:

Financial Module requirement removed, 6-mo option added to AMARG Implementation PoP, special project provision added, cost estimates updated to reflect expected costs based on initial proposals and requirement changes.

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This action is to limit the source of MABSM services for four (4) currently planned task orders in addition to special projects that are expected to arise against MAS 47QTCA22D004W held by SI for MABSM services. These will be new task orders which will serve as a bridge action from the current MABSM indefinite-delivery/indefinite-quantity (IDIQ) contract, FA8224-19-D-A003, to a future competitive effort currently in work. The current IDIQ was awarded on a sole-source basis to SI. Prior to that, the requirement was fulfilled under FA8224-12-C-0030. This contract was competed, but only SI was found to be technically acceptable.
As all four (4) task orders will be required to bridge current services, and special projects have historically been a critical component of the MABSM program life cycle, this is a class LSJ&A to encompass all planned and anticipated task orders.

The required task orders are detailed as follows:
1) MABSM Sustainment Hub; PoP: 10 Jul 2026 - 9 Jan 2029; FFP - Est. [redacted] One (1) base year, with one (1) option year, and a six (6) month option
- Base Year: 10 July 2026 - 09 July 2027
- Option Year 1: 10 July 2027 - 09 July 2028
- 6-month Option: 10 July 2028 - 09 Jan 2029

2) Implementation for Aerospace Maintenance and Regeneration Group (AMARG); PoP: 10 July 2026 - 9 Jan 2028; FFP - Est. [redacted]
- Base Year: 10 July 2026 - 09 Jan 2027
- 6-month Option: 10 July 2027 - 09 Jan 2028

3) MABSM Aircraft Modules Sustainment; PoP 10 Jul 2026 - 9 Jan 2029; FFP - Est. [redacted]; One (1) base year, with one (1) option year, and a six (6) month option

- Base Year: 10 July 2026 - 09 July 2027
- Option Year 1: 10 July 2027 - 09 July 2028
- 6-month Option: 10 July 2028 - 09 Jan 2029

4) MABSM Commodities Electronics Missiles & Propulsion (CEMP) sustainment; PoP: 10 Jul 2026 - 9 Jan 2029; firm-fixed-price (FFP) - [redacted] One (1) base year, with one (1) option year, and a six (6) month option
- Base Year: 10 July 2026 - 09 July 2027
- Option Year 1: 10 July 2027 - 09 July 2028
- 6-month Option: 10 July 2028 - 09 Jan 2029

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5) Anticipated MABSM Special Projects; PoP: 10 Jul 2026 - 9 Jan 2029; firm-fixed-price (FFP) - Est. [redacted]

- task orders may be issued at any time as projects arise, but will not exceed the estimated total cost cited here nor will any project extend beyond the 9 Jan 2029 date cited here.

III. Description of supplies/services required to meet agency needs.

The required services are as follows:
1) MABSM Hub Sustainment: This task order will provide application sustainment and modernization activities, configuration and code control across the two (2) current modules of the application (Aircraft, & CEMP) and any other modules added during the PoP. These services shall include all business management oversight, data configuration management, process standardization, user/configuration formal training, and validation of software change services required to sustain the MABSM application.
2) Completion of MABSM Implementation at AMARG: Currently, SI is working to implement the MABSM application at AMARG to subsume it's legacy IT business support system. This effort will not be completed by the time the current task order performance period expires, so this task order will be necessary to complete implementation of MABSM at AMARG. SI must be allowed to continue this implementation process uninterrupted.
3) MABSM Aircraft Module Sustainment: This task order will provide overall sustainment of the MABSM application Aircraft/multiple transaction module. This includes ensuring that the module is available to users at least 95% of required hours, managing its interface with legacy systems, managing user access, responding to engineering change requests (ECR) and requests for change (RFC), designing, developing, testing, and implementing software changes, managing source code and data stores, responding to security updates, and tactical, on-the-job user training and support. This is an ongoing, permanent requirement for the successful operation of the MABSM application in the depot environment.
4) MABSM CEMP Sustainment: This task order will provide overall sustainment of the MABSM application CEMP/single transaction module. This includes ensuring that the application is available to users at least 95% of required hours, managing its interface with legacy systems, managing user access, responding to engineering change requests (ECR) and requests for change (RFC), designing, developing, testing, and implementing software changes, managing source code and data stores, responding to security updates, and tactical, on-the-job user training and support. This is an ongoing, permanent requirement for the successful operation of the MABSM application in the depot environment.

5) Anticipated MABSM Special Projects: The Government anticipates a continued requirement for "Special Projects" to address emergent MABSM application requirements that exceed the magnitude of the currently planned task orders (Hub, Aircraft, CEMP, & AMARG Implementation) during performance. Historically, these projects have been a critical component of the MABSM program life cycle. Over the past 5 years, the government has successfully executed 24 special project actions, demonstrating a consistent and recurring need. These requirements typically materialize at unpredictable intervals with minimal lead time and dictate a faster than normal execution pace to prevent degradation of service, generally going from identification to execution within 30 - 60 days.

Special projects may be specifically requested by the government or identified by the contractor and approved by the government. A special project is defined as any task or set of tasks required to satisfy MABSM application requirements that exceed the anticipated magnitude of RFC or Engineering Change Request tasks that were originally defined in the Hub, Aircraft, AMARG or CEMP module task order PWSs. Once identified and defined, the special project terms will be negotiated by the contracting officer and incorporated into one of the existing task orders by exercising the option CLIN or executed as a stand-alone task order as appropriate. Special projects may include, but are not limited to application enhancements, interface management, Art of the Possible (AoP) management required changes, implementation of wireless capabilities, AI insertion, timekeeping modules or similar types of projects. The special project CLIN shall not be used in instances where the contractor failed to plan accordingly to execute work being done on the other CLINs according to the schedule on a performing task order. The special project CLIN shall not be used to cover contractor overruns. The sum of all special projects, either as option CLINs or task orders, will not exceed $6,615,821.77 in total for all actions executed under this justification. No special project action PoP will extend beyond 9 Jan 2029.

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All Task Orders:

The required services are non-commercial and performance based.

All task orders will utilize Consolidated Sustainment Activity Group - Maintenance (CSAG-M) (4930) funding.

IV. Identification of the justification/rationale for limiting sources and demonstration of the contractor's unique qualifications to provide the required supply/service.

This set of task orders is required as a bridge action to continue MABSM services from 10 July 2026 - 9 January 2029 to allow time for a permanent follow-on IDIQ [redacted]. The ordering period for the current sustainment contract, FA8224-19-D-0003, expired on 9 July 2025 and performance on the remaining active task orders will end on 9 July 2026. [redacted] Due to these changes and ongoing work, modifications to requirement documents and risk assessment updates are required and this bridge will provide service through that requirement definition period. GSAR 538.7104-3 requires an ordering activity to justify its actions when restricting consideration of schedule contractors.

In accordance with (IAW) GSAR 538.7104-3(b)(ii), only one source is capable of providing the services required at the level of quality required due to the highly specialized and unique nature of the MABSM application and the services required to maintain and implement it.

The above authority is appropriate because SI is the only entity that has the familiarity and competence with MABSM to be able to maintain and implement it to the required standard. [redacted] SI has been able to maintain the system with the highest code quality of any comparable application. A code scan of the MABSM system revealed that it contained less than [redacted] duplication, only [redacted] cyclicality and [redacted] modularity. [redacted] Mission requirements demand this level of quality service because any degradation in code risks loss of capability and reductions in the efficiencies that enable the real-time tracking of every aircraft, aircraft part, nuclear weapons-related material (NWRM) item, and financial transaction in the system. These performance quality requirements are essential as even small losses in efficiency and visibility can put the entire depot process at risk and any amount of system down-time results [redacted] Furthermore, for national security reasons, NWRM items must be 100% accountable in any given 24hr period.

Without proper off-ramping and full-scope knowledge transfer from SI to any other entity that may take on the effort, this level of performance would be impossible for any other entity besides SI to maintain.

Due to the anticipated award of what was to be the permanent, AFSC-wide MRO solution, formerly referred to as the "MRO Initiative" (MROi), proper off-ramping and knowledge transfer provisions were not included in the current MABSM contract. For this reason it is necessary to award this bridge effort, which will include such provisions, to SI to maintain the system while a competitive effort is being worked. In the event that SI is not awarded the competed effort, the off-ramping provisions will allow for continuity and full-system integrity during the hand-off to a different contractor.

V. Determination by the ordering activity Contracting Officer that the order represents the best value consistent with FAR 8.404(d).

IAW R-DFAR 208.470(d), the hourly labor rates on the contractor's GSA Schedule have already been determined by GSA to be fair and reasonable. Therefore, the Contracting Officer's price evaluation will be performed IAW R-DFAR 208.470(d) to determine if the proposed labor mix and total number of hours for each task order are reasonable for the criteria provided in the performance-based work statement (PWS). The program team has developed an independent government cost estimate (IGCE) which will be the primary tool used in this evaluation. Through this analysis, the Contracting Officer will determine that the total proposed price for each order represents the best value and is fair and reasonable.

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VI. Description of the market research conducted and the results, or explain why market research was not conducted.

Before the decision was made to utilize SI's GSA MAS to issue task orders as a bridge to a competed IDIQ, the program team performed a full range of market research (MR) activities in support of an acquisition strategy to award a sole source IDIQ to SI. The MR process included a sources sought synopsis (SSS) posted to Federal Business Opportunities (FBO) (FA8224RMABSMImplementation) from 10 September 2024 to 24 September 2024 which received seven (7) responses. Another SSS was posted to SAM.gov from 7 April 2025 to 17 May 2025 which received 16 responses, two (2) of which responded to the first SSS, amounting to 21 interested companies.
Additionally, the AFSC Software Directorate (AFSC/SW) was considered as an organic resource to accomplish the services. AFSC/SW sent a team to OO-ALC on 29 January 2025 to assess MABSM to determine if they were capable of sustaining and implementing the system. They determined that they were not capable of performing the required services independently. Most of the companies that responded to the SSSs provided capabilities statements claiming that they could perform the work. Two companies provided capabilities briefings as well, but besides SI, none had the necessary experience directly with MABSM that would enable them to independently perform to the level of quality required to avoid serious disruption to system availability and reduction in code quality.
One 8(a) company, [redacted] proposed to partner with SI as part of their strategy and was awarded a narrow scope of work to help build the system out within AFSC under the direct award program. However, this company is also not capable of independently performing the full scope of work.
[redacted] n order to make such a competed effort possible, this bridge effort is necessary to provide continued service while that effort is worked and to supply the proper off-ramping and knowledge transfer that will set the follow-on contract up for success.
The program team was not originally planning on pursuing an acquisition strategy utilizing a GSA MAS, favoring a locally developed and executed IDIQ contract. However, executive order 14240 signed on 20 March 2025, requires government agencies to utilize GSA schedules to the maximum extent possible. After extensive review of the GSA MAS ordering procedures, it was determined that the utilization of the GSA MAS is a viable acquisition strategy for this bridge effort. The functional management office (FMO) technical expert reviewed the labor categories on SI's GSA contract to determine whether or not they were inline with what SI is currently doing on MABSM's efforts, on 25 September 2025 and determined that SI's GSA contract is within scope of this requirement.
MR conclusions fully support the use of SI's GSA MAS on a limited source basis.

VII. Other facts supporting the justification.

N/A

VIII. Actions the agency may take to remove or overcome any barriers that led to the restricted consideration before any subsequent acquisition for the supplies or services.

The MABSM program is currently in a limited source environment because full off-ramping and knowledge transfer procedures were not built into the current contract. This is not due to the government's failure to plan, but is a result of the anticipated award of a different enterprise MRO system that was supposed to replace MABSM. The replacement MRO system has not yet become operational and may not be available in the foreseeable future. For this reason MABSM has become the most viable stop gap depot MRO application for AFSC.
The government owns the MABSM application and all data rights to it, relying on contract support only for the knowledge and expertise required to implement and sustain it. This knowledge and expertise has thus far been held almost exclusively by SI, with limited organic capability. [redacted]

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IX. Certification by the Contracting Officer.

As evidenced by my signature above, I have determined this document to be both accurate and complete to the best of my knowledge and belief.

X. Certification by the technical/requirements personnel.

As evidenced by my signature above, I certify that any supporting data contained herein, which is my responsibility, is both accurate and complete.