[redacted]

SPRDL1-24-R-0154 (JA-00781)
No prior J&As available

**JUSTIFICATION AND APPROVAL**
**FOR OTHER THAN FULL AND OPEN COMPETITION**
**SPRDL1-24-R-0154**

1. **Contracting Agency:** Defense Logistics Agency - Land Warren (DLA-WRN).

2. **Description of Action:** DLA-WRN proposes to award a new Firm-Fixed-Price contract to Astronics Test Systems Inc. (Astronics), Commercial and Government Entity (CAGE) 21793, or an offeror providing the approved product for the Circuit Card Assembly (CCA), National Stock Number (NSN) 5998-01-659-7676, Manufacturer Part Number (PN) 407919-006, Government PN 13707861, using Army Working Capital Funds.

3. **Description of Supplies/Services:** The CCA is used on the Next Generation Automated Test System (NGATS). The deliverables for this contract is for a base quantity of 23 each, with a 100% option for a total quantity of 46 each. The total estimated maximum value of this contract is [redacted].

**Acquisition Method Code (AMC):**
3 - Acquire, for the second or subsequent time, directly from the actual manufacturer.

**Acquisition Method Suffix Code (AMSC):**
H - The Government physically does not have in its possession sufficient, accurate, or legible data to purchase this part from other than current source(s). (NOTE: This code is applicable only to parts under immediate buy requirements and only as long as the deficiency is under review for resolution and appropriate recoding.)

4. **Authority Cited:** The statutory authority permitting other than full and open competition for this effort is 10 United States Code (U.S.C.) 3204(a)(1) as implemented by Federal Acquisition Regulation 6.302-1 only one responsible source and no other supplies or services will satisfy agency requirements.

5. **Reason for Authority Cited:** This CCA is a component of the Console Communications NGATS. Astronics owns all technical data rights for this component. There is no Technical Data Package (TDP) for the CCA. This procurement is restricted to Astronics, who is the Original Equipment Manufacturer that designed and developed the CCA. Astronics owns the TDP for the CCA. Reverse Engineer is the only option to develop a competitive TDP which is required for full and open competition. It is estimated that a Reverse Engineering effort by a second contractor would take [redacted] to complete. This contractor would then need [redacted] to qualify, [redacted] for production and [redacted] for TDP publication and Technical Manual updating) and [redacted] to produce prototypes for both in-house and on-vehicle testing to qualify their design of this item for use on the Bradley Turret. It should be noted that during this process, there is no guarantee that this process would



[redacted]

[redacted]

result in a second vendor becoming a qualified production source for this item. Additionally, the qualification of a second vendor would not guarantee any large decrease in unit cost. Reverse engineering the TDP includes but is not limited to the following:

**Phase 1: Initial Phase**

| Task | Delay | Cost |
|---|---|---|
| Review Drawings / Specifications to Establish Requirements | [redacted] | [redacted] |
| Engineering Studies | [redacted] | [redacted] |
| Site Visits | | |
| Market Research | | |
| **Estimated Totals** | | |

**Phase 2: Qualifying Phase**

| Task | Delay | Cost |
|---|---|---|
| Engineering Evaluations and Support | [redacted] | [redacted] |
| Select Vendors | | |
| Obtain Spares | | |
| Testing & Evaluations (QA) | | |
| Travel | | |
| Develop Competitive TDP and Update Technical Manuals | | |
| **Estimated Totals** | [redacted] | [redacted] |

**Total Estimated Reverse Engineering Costs:** [redacted] [redacted]

The Government would not be able to recover, through subsequent competition, the duplication of costs involved in reverse engineering the item to create a competitive TDP within a reasonable time frame. Estimate at the current average [redacted] a current unit cost of [redacted], and assuming 25% savings achieved through competition, the [redacted] in annual savings would take over [redacted] years to offset the estimated [redacted] cost of reverse engineering the item and qualifying another source.

## 6. Efforts to Obtain Competition:

a. Effective competition: Due to the reasons mentioned in Section 5, the Government is not pursuing competition for this item. Notices required by FAR 5.201 will be posted.

b. Subcontracting competition: Unless the contract is awarded to a small business, the solicitation and resulting contract will include FAR clauses 52.219-8, "Utilization of Small Business Concerns"; 52.244-5, "Competition in Subcontracting"; 52.219-16, "Liquidated Damages--Subcontracting Plan"; and

Defense Federal Acquisition Regulation Supplement 252.219-7003, "Small Business Subcontracting Plan (DoD Contracts)" to maximize small business opportunities and utilization.

**7. Actions to Increase Competition:** There are no plans to increase competition for future procurements due to the reasons cited above.

**8. Market Research:** A Sources Sought Notice was posted to SAM.gov on 19 November 2024 and was open for seven days. Responses were received from four potential contractors (including Astronics).

Market Research was also conducted by the U.S. Army, Combat Capabilities Development Command – Armaments Center, Rock Island on 20 November 2024. An online search for the words “Circuit Card Assembly” “NGATS” and “NSN 5998-01-659-7676” was conducted and the results indicated that there are no commercially available products that would meet the known requirements.

**9. Interested Sources:** Responses were received from the following four potential contractors.

The original Sources Sought Notice was posted to SAM.gov on 18 July 2024 and resulted in a single response from contractor BHPE LLC (CAGE 9SWS7). However, it was later discovered the part number listed in the original notice was incorrect. The revised Sources Sought Notice was posted to SAM.gov on 18 September 2024 and two additional contractors (Kingdom Defense Group LLC (CAGE 9Y9H3), and United International Technologies Inc (CAGE 9V7H6)) contacted the Government expressing interest in this acquisition effort. All respondents were directed to contact the TACOM Ombudsman Directorate to assist them in becoming qualified suppliers of this part. Astronics also responded to the Sources Sought Notice and is the approved source for the subject part.

**10. Other Facts:** Procurement History:

Contract Number: W15QKN-18-D-0073
Delivery Order Number: W15QKN-20-F-0358
Contractor: Total Technology, Inc (4A9K4)
Award Date: 27 April 2020
Contract Value: UNKNOWN - Total contract value unknown; Item value $857,538.99
Competitive Status: UNKNOWN; This contract was awarded by another agency

Contract Number: W15QKN-18-D-0077
Delivery Order Number: W15QKN-20-F-0097
Contractor: Logisys Technical Services, Inc. (6UAJ9)
Award Date: 20 December 2019
Contract Value: UNKNOWN - Total contract value unknown; Item value $115,631.45
Competitive Status: UNKNOWN; This contract was awarded by another agency

**11. Technical Certification**: I certify that the supporting data under my cognizance which is included in the justification is accurate and complete to the best of my knowledge and belief.

Name: [redacted]
Title: Chief, Direct Mobile Fire Branch
Signature:

3/27/2025

X [redacted]

Signed by: [redacted]

**12. Requirement Certification:** I certify that the supporting data under my cognizance which is included in the justification is accurate and complete to the best of my knowledge and belief.

Name: [redacted]
Title: Division Chief – Sourcing Division
Signature:

3/19/2025

X [redacted]

Signed by: [redacted]

**13. Fair and Reasonable Cost Determination:** I hereby determine that the anticipated cost to the Government for this contract action will be fair and reasonable. This determination will be based on the results of a detailed cost and/or price analysis. The contractor will be required to submit certified cost or pricing data as this item has been determined to be an other than commercial product.

Name: McCarthy, Ralph F CIV DLA LAND AND MARITIME (USA)
Title: Contracting Officer
Signature:

3/20/2025

X Ralph McCarthy

Signed by: MCCARTHY.RALPH.FITZGERALD.[redacted]

**14. Contracting Officer Certification:** I certify that this justification is accurate and complete to the best of my knowledge and belief.

Name: McCarthy, Ralph F CIV DLA LAND AND MARITIME (USA)
Title: Contracting Officer

[redacted]

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Signature:

3/20/2025

X Ralph McCarthy

Signed by: MCCARTHY.RALPH.FITZGERALD.[redacted]



[redacted]

[redacted]

SPRDL1-24-R-0154 (JA-00781)
No prior J&As available

**Approval Authority for Acquisitions Greater Than $750,000 But Less Than $15M**

APPROVAL OF JUSTIFICATION
FOR OTHER THAN FULL AND OPEN COMPETITION

Based on the foregoing Justification, I hereby approve the procurement of the following:

a. Noun: Circuit Card Assembly

b. NSN: 5998-01-659-7676

c. Basic Quantity: 23 each

d. Basic Estimated Value: [redacted]

e. Option Percentage: 100%

f. Quantity with Option: 46 each

g. Total Estimated Value with Option: [redacted]

This action will be awarded under other than full and open competition pursuant to the authority of 10 U.S.C. 3204(a)(1) and subject to the availability of funds. This approval is subject to the provision that the property herein described has otherwise been authorized for acquisition.

Signature:

WIEBUSCH.JAM[redacted]
Digitally signed by WIEBUSCH.JAMIE[redacted]
Date: 2025.04.03 13:44:08 -04'00'

X IE[redacted]

Competition Advocate



[redacted]