United States Department of Agriculture
Justification to Restrict Competition
Identification Number:

In accordance with the Revolutionary Federal Acquisition Regulation (FAR) 12.102 (b), the following justification documents the decision to restrict competition for this acquisition.

(1) Mission Area and Contracting Activity.

This requirement is for the United States Department of Agriculture (USDA), Scientific Computing Initiative Network (SCINet), and Marketing and Regulatory Programs - (MRP) Animal and Plant Health Inspection Services (APHIS).

United States Department of Agriculture, Departmental Administration, Office of Contracting and Procurement, Procurement Operations Division, 301 S. Howes Street, Suite 321, Fort Collins, CO 80521.

(2) Nature and/or description of the action being approved.

The USDA proposes to issue a new sole source contract on a firm-fixed-price basis for Internet2 circuits and annual membership via the University Corporation for Advanced Internet Development. This is a commercial item. Simplified procedures under RFO FAR Part 12.201-1 will be used.

The contractor is:
University Corporation for Advanced Internet Development
PO Box 72751
Cleveland, OH 44192
UEI: DZEBKFRD1ZN6

(3) A description of the supplies or services required to meet the agency's needs (including the estimated value).

SCINet, the high-performance research network infrastructure supporting USDA's scientific computing and data-intensive research, relies on a robust, high-speed backbone to interconnect its primary compute and data nodes. The circuits comprising this backbone are provisioned via Internet2, a specialized non-profit organization that provides advanced networking services tailored for the research and education (R&E) community. USDA's APHIS and SCINet program supports a broad range of computationally intensive scientific research activities, data-intensive workflows, and collaborative scientific endeavors, all of which depend on ultra-high-speed, low-latency, and highly reliable network access. This effort will provide Internet2 circuits for the specialized R&E network backbone required by USDA for SCINet as well as APHIS' research networking needs. This effort also will provide the annual Internet2 membership for all USDA organizations.

The contract will consist of one 12 month base period and four 12 month option periods.

	Base Period	Option Period 1	Option Period 2	Option Period 3	Option Period 4	Total
Services: Firm Fixed Price	$1,050,701.05	$1,071,715.07	$1,093,149.37	$1,115,012.36	$1,137,312.61	$5,467,890.46

(4) Identify the statutory authority permitting other than full and open competition.
The statutory authority permitting other than full and open competition is 41 U.S.C. 1901 - FAR 12.201-1, Simplified Procedures.

(5) Demonstrate that the proposed contractor's unique qualifications or the nature of the acquisition requires using the authority cited.

USDA SCINet and APHIS MRP workflows require reliable, high-speed data movement across geographically distributed computing environments. Specifically, Internet2 (I2) provides dedicated high-capacity circuits (100GBps and scalable) supporting bulk data transfers and low-latency paths optimized for high-performance computing and storage workflows. Internet2 is a nonprofit consortium uniquely dedicated to serving the research and education community. Its network architecture and associated services are specifically engineered to meet the specialized requirements of large-scale academic and government research.

I2 supports USDA's use of the Science DMZ model enabling secure, high performance data transfers that bypass traditional enterprise firewall bottlenecks and are compatible with perfSONAR and other tools that monitor end-to-end network performance, which are critical for diagnosing and optimizing large-scale data flows. Internet2's Next Generation Infrastructure, which is proprietary to I2, provides programmable and cloud-integrated networking with direct peering with major cloud providers, access to research-specific overlays and federations including USDA, NOAA, ESnet and DOE Labs.

The Internet2 Consortium has negotiated long-term Indefeasible Rights of Use (IRUs) agreements with national and international fiber optic owners resulting in substantial savings to consortium members as well as unique network access. The IRU agreements with owners of fiber optical cable have allowed Internet2 to create a national network footprint specifically for the advancement and proliferation of scientific, research and education networking.

Renewing annual membership and circuit service with Internet2 aligns USDA with the broader U.S. research infrastructure, enabling USDA scientists to participate in multidisciplinary collaborations, share data and tools with academic and federal partners, and contribute to open science initiatives. Internet2's trusted environment also supports USDA's compliance with federal data policies and research security requirements. Given Internet2's specialized capabilities and deep integration into the national research infrastructure, it remains the only provider for SCINet and APHIS's backbone circuits. Renewing this service contract ensures that USDA's research community continues to benefit from secure, high-speed, and scalable networking essential for modern scientific discovery.

(6) Provide a description of efforts made to ensure that offers are solicited from as many potential sources as possible, including whether a notice was or will be publicized as required by Part 5 and, if not, which exception under Part 5 applies.

A sole source notice of intent will be posted to www.sam.gov notifying the public of USDA's intent to negotiate directly with the University Corporation for Advanced Internet Development for the acquisition of this requirement. Any responses received will be documented in contracting file.

(7) A determination by the Contracting Officer that the anticipated cost to the Government will be fair and reasonable.

The anticipated cost to the government will be fair and reasonable based on price analysis in comparison to the historical pricing Award 12314425C007550 and other market price data available for similar and recently procured services.

(8) A description of the market research conducted, and the results or a statement of the reason Market Research was not conducted.

Historical experience and research demonstrate that the required services are unique to this contractor and require a sole source effort. Internet2 is not a conventional Internet Service Provider (ISP). Rather, it operates one of the most advanced research and education networks in the world: an environment that integrates seamlessly with federal research infrastructures, supports large-scale data transfers, and provides paths to specialized R&E resources and international research collaborators. The organization's peering relationships, network engineering expertise, and technical support are tailored to high-bandwidth scientific collaborations. These capabilities include robust performance monitoring, custom routing policies, direct on-ramps to critical research instruments and facilities, and the ability to rapidly provision flexible, software-defined network services that cannot be replicated by general commercial providers.

Further, Internet2's longstanding partnerships with universities, federal labs, and research institutions worldwide uniquely position it to anticipate and respond to the evolving needs of the USDA environment. Leveraging Internet2's network directly enables participants to access a global ecosystem of specialized research platforms, high-performance computing resources, and shared data repositories without the throughput bottlenecks and service limitations inherent in typical commodity internet connections. For example, if these research applications were run through USDANet or another commonly provided commodity internet connection, it would so significantly impair the bandwidth availability as to make all other uses of that internet connection useless thereby negatively impacting all other USDA users as they accessed daily networking resources. This environment, unmatched in scale and sophistication, ensures that USDA's mission-critical data flows, modeling, and analytical tasks are fully supported, thus directly contributing to scientific advancement and agricultural innovation.

The APHIS and SCINet programs periodically assess the market environment to ensure Internet2 membership and access is still warranted. A survey of other telecommunication services contracts like the GSA Enterprise Infrastructure Solutions (EIS) Government-Wide Acquisition Contract (GWAC) to determine the availability of scientific, research and education connectivity support that meet USDA's needs show that the EIS contract, which provides access to large commercial telecommunication providers and is currently used to provide common network connectivity for USDANet, does not have the capability to provide I2 circuits or otherwise meet a similar need. At minimum, GSA would have to negotiate contract modifications with each of its IDIQ awardees.

In addition, USDA technical experts periodically discuss these requirements within the networking industry and the scientific research community to measure the private sector's ability to provide comparable connectivity services to those offered by Internet2's non-profit, research and education

consortium model. This includes attending technology summits, meetings, conferences, and workshops in both the commercial and scientific-based networking communities (e.g. Westnet, Supercomputing and the Department of Energy's science engagement summits) in order to ensure familiarity and education on scientific, research networking events, technological advancements and services. Due to the inherent exclusivity associated with Internet2's non-profit, research and education, member-controlled and member-operated network, combined with the unique connectivity and security offerings provided by Internet2's consortium network, the Government's market research concludes that Internet2 is the only source for the required services.

Considering all available market data and prior acquisition efforts, no other vendor offers the same combination of specialized networking capabilities, research-focused connectivity, and integrated support services as Internet2.

(9) Any other facts supporting use of other than full and open competition, such as:

N/A

(10) A listing of the sources, if any, that expressed an interest in the acquisition in writing.

N/A

(11) A statement of the actions, if any, the agency may take to remove or overcome any barriers to competition before any subsequent acquisition of the supplies or services required.

USDA will ensure that any additional market research, as necessary, is conducted before any subsequent contracting actions are undertaken. If appropriate alternatives are identified that would create a competitive environment, USDA will undertake appropriate action to maximize competition.