Sole Source (Including Brand Name) Justification - Simplified Procedures for Certain Commercial Items

NOTE: *If a Justification was approved for the preceding acquisition, a copy of the approved Justification for the predecessor action must be included in the staff package for approval of the instant Justification. This applies to Justification staff packages that are submitted for review and approval at a level above the contracting officer. The predecessor Justification will be used as a reference document by the approving official.*

Is this a new or amended J&A Document? ☒ New ☐ Amended (*Prior to Award Only!*)

Is this a Bridge Action as defined in the AF Bridge Action Reduction Plan? ☐ Yes ☒ No

Funding level for this acquisition: ☒ >SAT and ≤ $750K ☐ > $750K and ≤ $15M

Contracting Activity: 19 CONS/PKA, 642 THOMAS AVENUE, LITTLE ROCK AFB AR 72099

Purchase Request / Local ID Number: N/A

Program / Project (and PE, if applicable)**:** Equipment Racks - 19CABS

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

Authority: ☒ AFFARS 5313.501 - 10 U.S.C. 2302b, Implementation of Simplified Acquisition Procedures (41 U.S.C. 1901)

☐ AFFARS 5313.501 - 10 U.S.C. 2304a, Special Emergency Procurement Authority (41 U.S.C. 1903)

Estimated Contract Cost (including options)**:** $201.168.00 **Justification Type:** ☐ Class ☑ Individual

COORDINATION (AFFARS 5306.304(a))

Date	Project Lead / Program Mgr / Requiring Activity	Signature
	Jeremy Grider, GS-12, DAF 19 LRS/LGRM, (501-987-5040) jeremy.grider.1@us.af.mil	

Date	Contracting Officer	Signature
	Kelly, Richard SSgt AMC 19CABS, 501-987-6807 richard.kelly.32@us.af.mil	KELLY.RICHARD.THOMAS.1528102740 Digitally signed by KELLY.RICHARD.THOMAS.1528102740 Date: 2026.07.10 09:54:33 -05'00'

APPROVAL (AFFARS 5306.304(a))

Date	Chief of the Contracting Office (COCO)	Signature
	[Official Signature Block]	

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I. Contracting Activity.

19 Contracting Squadron

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

1. LAYOUT new warehouse configuration to accommodate the installation of 4 additional Pallet Rack Rows to OSHA standards. 2. LABOR includes installation of new Pallet racks, guide rails, and bollards and the disassembly of current pallet racks, removing anchors, relocating and the reassembly of current pallet racks, relocation of safety guide railing, and bollards. All anchors must be removed and floor repaired as needed and new anchors installed. 3. MATERIALS: Welded HUSKY BRAND (OSHA requirement to match existing system) Pallet Racks. 3 different height levels of pallet racks (22', 16', and 12')

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

SAFETY: Mixing parts voids original manufacturer load ratings and will not meet safety requirements. Catastrophic structural failure of the Pallet Rack system could result from weaknesses created by mixing manufactures and may cause serious injury or death to personnel.

Current Pallet Rack system in place is HUSKY BRAND. Due to safety requirements we must stay with the same type due to adjustable shelves will be cross-utilized depending on size of items stored.

Do Not Mix Brands: Avoid combining parts from different manufacturers within the same bay or upright frame to prevent collapse.

OSHA **General Duty Clause** OSHA Warehouse and general storage standards 29 CFR 1910.176(b), Warehousing hazards are addressed in specific standards for general industry (29 CFR 1910) Because mixing components from different manufacturers compromises structural integrity and load ratings, OSHA inspectors cite employers for violating these general provisions.

Why Mixing Shelving is an OSHA Hazard

- **Mismatched Tolerances:** Uprights, beams, and safety pins have slight variances in size between brands. Mixing them creates loose connections and unstable frames.
- **Altered Load Capacities:** An entire system's weight capacity is determined by its weakest individual part. Mixing parts voids original manufacturer load ratings.

How to Stay Compliant

To ensure your facility is safe and compliant with OSHA's General Duty Clause OSHA Warehouse, you should rely on industry standards set by the Rack Manufacturers Institute (RMI) and the American National Standards Institute (ANSI) Storage rack safety:

These racks will be installed in a location with other racks of the same brand. The nature of these racks is four supporting pylons allowing the horizontal shelving to be placed and removed to support varying sizes of items requiring storage as needed. To refrain from the safety concerns involving mixing of shelving, it is imperative to only accept Husky brand units.

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IV. Statutory authority permitting other than full and open competition.

FAR 6.103-1(c) - Supplies and services may be deemed as available from only one source under this authority under the following circumstances—

(1) When an unsolicited research proposal shows a unique and innovative concept (see definition at 2.101) the substance of which is not otherwise available to the Federal Government and does not resemble the substance of a pending competitive acquisition. For DoD, NASA, and the Coast Guard, this authority extends to situations where a source demonstrates a unique capability to provide the particular research services proposed.

(2) When awarding a follow-on contract for the continued development or production of a major system or highly specialized equipment and, for DoD, NASA, and the Coast Guard, for the continued provision of highly specialized services, would result in—

(i) Substantial duplication of cost to the Government that is not expected to be recovered through competition; or

(ii) Unacceptable delays in fulfilling the agency's requirements.

V. Demonstration that the contractor's unique qualifications or nature of the acquisition requires the use of the authority cited above (applicability of authority).

Is the authorized HUSKY dealer in the Area. any Husky brand item will meet this need and can be competed on SAM or GSA.

VI. Description of efforts made to ensure that offers are solicited from as many potential sources as practicable.

The requirement is being solicited via SAM.gov

VII. Determination by the Contracting Officer that the anticipated cost to the Government will be fair and reasonable.

Based on the independent Government Cost Estimate (IGCE) and the vendor-provided quote, the proposed price is anticipated to be fair and reasonable.

VIII. Description of the market research conducted and the results, or a statement of the reasons market research was not conducted.

Additional market research has been conducted to identify sources. More than one distributor of Husky brand racks exist.

IX. Any other facts supporting the use of Other Than Full and Open Competition.

Due to safety requirements we must stay with the same type due to adjustable shelves will be crossed-utilized depending on size of items stored.

X. List of any sources that expressed, in writing, an interest in the acquisition.

All Storage Products Inc (ASPI) expressed,in writing,an interest in the acquisition. Please see market research for additional details.

XI. A statement of the actions, if any, the agency may take to remove or overcome any barriers to competition before making subsequent acquisitions for the supplies or services required.

Will allow sufficient lead time for vendors to prepare and submit offers.

XII. 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.

XIII. Certification by the technical/requirements personnel.

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