Memorandum for Record – Limiting Competition at or below the Simplified Acquisition Threshold

1. **Requiring Activity:** 418th Contracting Support Brigade, Fort Hood, TX

2. **Contracting Activity:** [redacted]

3. **Description of Action:**

Nature of Requirement: ☒ New ☐ Follow-on ☐ Extend

Brand Name: ☒ Yes ☐ No

Contract Vehicle: ☒ Purchase Order
☐ Blanket Purchase Agreement (BPA)
☐ Order/BPA against FSS Contract #_____
☐ Order against multiple award IDIQ Contract
☐ Order against a single award IDC Contract
☐ Modification to existing PO/TO/DO/Call Order

Pricing/Contract Type: ☒ Fixed Price
☐ Cost Reimbursable

Funds: FY: 26
☒ Operations & Maintenance, Army (OMA)
☐ Other Funds: _____

Name of Proposed Contractor(s) and Address:
Multiple Contractors

4. **Description of Services or Supplies:** This acquisition is for the procurement of two (2) Creaform HandySCAN Pro handheld three-dimensional laser scanner package, along with associated proprietary software licenses, hardware accessories, and multi-year technical support agreements.

In layman's terms, a three-dimensional laser scanner is a highly specialized metrology device that projects multiple blue laser lines onto a physical object to rapidly capture its exact physical geometry and dimensions. The scanner translates this physical object into a highly accurate digital "point cloud" or mesh model.

This digital data is then utilized for reverse engineering (recreating three-dimensional models of legacy military parts that no longer have active supply chains) and high-precision inspection (verifying that manufactured or repaired components perfectly match their original blueprint specifications to prevent part failure).

Acquisition Structure and Estimated Value:
The proposed action is a new purchase order consisting for two (2) Creaform HandySCAN Pro handheld scanners for a total estimated value of [redacted].

[redacted]

[redacted]	[redacted]	[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

5. Authority: Select the appropriate authority below:

☒ FAR 12.201-1 For commercial acquisitions valued at or below the simplified acquisition threshold

Limiting Sources when Ordering under the Federal Supply Schedule
☐ GSAM 538.7104-3(b)(1)(i) - Urgency
☐ GSAM 538.7104-3(b)(1)(ii) - Only One Source is Capable
☐ GSAM 538.7104-3(b)(1)(iii) - Logical Follow-on
☐ GSAM 538.7104-3(b)(1) (iv) - Satisfy minimum guarantee
☐ GSAM 538.7104-3(b)(1) (v) - Authorized or required by statute
☐ GSAM 538.7104-4 - Items peculiar to one manufacturer

Exceptions to Fair Opportunity
☐ FAR 16.507-6(b)(1) - Unusual and urgent need
☐ FAR 16.507-6(b)(2) - Only One Awardee is Capable
☐ FAR 16.507-6(b)(3) - Logical Follow-on
☐ FAR 16.507-6(b)(4) - Minimum Guarantee
☐ FAR 16.507-6(b)(5) - Statute Authorizes / Requires Purchase from Specified Source
☐ FAR 16.507-6(b)(6) - Satisfies Exception under FAR 6.103
☐ FAR 16.507-7 - Items peculiar to one manufacturer

6. Reasons for Authority Cited:

a. The Creaform brand and the HandySCAN Pro product are essential to the Government's requirements due to mandated interoperability with the organization's standardized metrology architecture. The HandySCAN Pro is uniquely required because it natively integrates into the proprietary Creaform software ecosystem (VXelements), which is the established baseline for our metrology workflow.

Selecting any other brand will not meet the Government's needs because it breaks this integrated ecosystem, resulting in an immediate and critical fragmentation of data processing. Introducing a non-Creaform scanner requires the Government to procure,

accredit, and maintain a separate, parallel software ecosystem and forces operators to undergo duplicate training protocols. This fragmentation creates a substantial duplication of cost to the Government—including software licensing, Authority to Operate (ATO) cybersecurity accreditation for new software, and specialized personnel training—that is not expected to be recovered through competition. Therefore, Creaform is the only brand capable of ensuring seamless workflow continuity and interoperability without introducing unacceptable delays and unrecoverable costs.

b. Failure to approve this justification will result in unacceptable delays and a substantial duplication of costs to the Government that cannot be recovered through competition. Procuring a non-interoperable scanner forces the Government to abandon its standardized digital engineering ecosystem, resulting in immediate operational fragmentation. Specifically, the Government will incur unrecoverable financial and temporal costs required to procure, accredit (including mandatory Authority to Operate/Risk Management Framework cybersecurity approvals), and sustain a redundant, parallel software architecture. Furthermore, introducing a disparate system creates a critical, ongoing training burden. Given the high operational tempo and frequent personnel turnover within the requiring activity, forcing operators to master multiple, non-integrated metrology platforms severely degrades mission readiness and creates unacceptable delays in establishing technical proficiency. Ultimately, this fragmented workflow directly compromises the Government's ability to execute essential dimensional validation and formal quality assurance, thereby degrading the immediate mission capabilities and readiness of the requiring activity.

7. Publicizing Contract Actions:

a. The public display and synopsis requirements of FAR 5.101(a) and FAR 5.101(d)
☐ do not apply, less than $20K threshold
☒ apply and will be followed
☐ do not apply due to an exception at FAR 5.101(b)(1)( )

b. Requirement to post justification in accordance with, FAR 12.102(a)(2), GSAM 538.7104-3(a)(3) or FAR 16.507-6(f) unless:
☐ Action is not a brand name restriction and is under SAT, no posting required.
☐ Action is a brand name restriction, under $40K, no posting required.
☐ Action is a brand name restriction over $40K but will not be posted due to the following exception:
☐ FAR 6.301(e)
☐ GSAM 538.7104-3(b)(3)(i)(B)
☐ FAR 16.507-6(f)(4)

8. Market Research: Market research was conducted between 4 June and 23 June 2026 by [redacted], with technical input from [redacted], to identify all qualified sources for a high-precision portable 3D scanning system. The research confirmed that only the Creaform HandySCAN Pro meets the Government's essential

requirements for interoperability, technical performance, and offline software functionality.
The market research process included a comprehensive review of mandatory sources, industry outreach, and an analysis of the commercial marketplace.

a. Mandatory Source Review (Conducted 10 June 2026): In accordance with FAR Part 8, the AbilityOne Program, Federal Prison Industries (FPI/UNICOR), and Army Computer Hardware, Enterprise Software and Solutions (CHESS) were reviewed. None could provide the required equipment. A formal Statement of Non-Availability (SoNA) was obtained from CHESS, authorizing an open market procurement.
b. Industry Outreach:
    - A Sources Sought notice posted to the Government Point of Entry (GPE) from 4-11 June 2026 [redacted].
    - A Request for Information (RFI) posted to GSA eBuy from 11-17 June 2026 to identify Federal Supply Schedule holders yielded zero responses.
c. Commercial Market Analysis: Research included direct review of Original Equipment Manufacturer (OEM) and authorized distributor websites ([redacted]). This analysis confirmed the Creaform HandySCAN Pro is a Commercial-Off-The-Shelf (COTS) item with a mature market.

Results and Conclusion: The combined results of this market research unequivocally support a brand-name specification. The research demonstrates that other companies' similar products do not meet, and cannot be modified to meet, the Government's critical needs for interoperability and data continuity with identical systems already in use at sister depots and engineering directorates. The outreach efforts failed to identify any small businesses capable of providing the required brand-name product, making a small business set-aside inappropriate as the "Rule of Two" cannot be met. Therefore, this acquisition must proceed as a brand-name requirement competed among authorized Creaform distributors to ensure technical compliance, warranty, and interoperability.

9. Other Facts: Not applicable.

10. Technical/Requirements Certification: I certify that the supporting data under my cognizance which are included in the justification are accurate and complete to the best of my knowledge and belief.

[redacted]

11. Contracting Officer Certification/Approval: I hereby determine that the anticipated cost or price to the Government for this contract action will be fair and reasonable based upon anticipated competition from potential vendors.

I certify that this justification is accurate and complete to the best of my knowledge and belief, and that completing this purchase as a brand name only requirement is in the best interest of the Government. Additionally, I approve this justification to limit competition subject to the availability of funds and provided that the supplies herein described have otherwise been authorized for acquisition.

[redacted]