JUSTIFICATION FOR AN EXCEPTION TO FAIR OPPORTUNITY
10 U.S.C. § 3205

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by Federal Acquisition Regulation (FAR) 16.507-6(d)(2) (FAR Class Deviation 26-04 Rev. 1[1]), this justification for an exception to fair opportunity is supported as follows:

1. **Agency and Contracting Activity.**

   The Department of Homeland Security, United States Coast Guard (USCG), CG-HCA-COCO Office proposes to enter into a task order with an exception to fair opportunity.

2. **Nature and/or Description of the Action being Approved.**

   (a) Nature of the action: USCG intends to procure on a sole source basis various mission-essential IT hardware and related supplies supporting the U.S. Coast Guard Academy (USCGA) .edu domain environment contingent on available funds.

   (b) Name and address of the contractor:

   ITC Federal
   4114 Legato RD STE 850
   Fairfax, Virginia 22033-4057

   (c) Contract Type: Contract Modification

   (d) Estimated total value of items:

Item Description	[redacted]
Laptop - Dell Pro 14 Plus (PB14250) or equal	
Cisco Catalyst 9200 switches, model C9200-48P-E or equal	
Dell Pro Max Tower T2 or equal	
Cisco wireless access points, model CW9172I-CFG or equal	
LG 98UH5J-H or equal	
ScreenBeam 1100 Plus or equal	

[1] In this document, citations to RFO Parts 6, 10, 15, 16, and 25 are citations specifically to FAR Class Deviation 25-11 for FAR Part 6, FAR Class Deviation 25-06 for FAR Part 10, FAR Class Deviation 26-08 Rev. 1 for FAR Part 15, FAR Class Deviation 26-04 Rev. 1 for FAR Part 16, and FAR Class Deviation 25-09 Rev.1 for FAR Part 25, which were issued as part of the Revolutionary FAR Overhaul (RFO), implemented in response to Executive Order 14275, ***Restoring Common Sense to Federal Procurement,*** signed April 15, 2025.

(e) Type of funding: Operations and support funds

(f) Year of funding: Fiscal Year 2026

(g) Solicitation number: 70Z02322FCGA00002 - Mod P00015

(h) Background information about the requirement: Contract 70Z02322FCGA00002 was competitively awarded under DHS's mandatory strategic sourcing vehicle VETS2. Its period of performance end date is 05/08/2027.

3. Description of Supplies/Services.

The requirement is to provide additional items to support the USCGA cadets and support the operation and management of the Academy's .edu domain through the acquisition of a variety of hardware items including access switches for mid-sized campus networks, high-performance workstation designed for demanding workloads, enterprise-grade Wi-Fi wireless access points, commercial digital displays for continuous 24/7 operations, enterprise-grade 4K wireless display and collaboration receiver, and laptops issued to each cadet for the purposed of their educational duties. The following the list of items:

1. Laptop - Dell Pro 14 Plus (PB14250) or equal
2. Cisco Catalyst 9200 switches, model C9200-48P-E or equal
3. Dell Pro Max Tower T2 or equal
4. Cisco wireless access points, model CW9172I-CFG or equal
5. LG 98UH5J-H or equal
6. ScreenBeam 1100 Plus or equal

4. Exception to Fair Opportunity.

The exception to fair opportunity is RFO 16.507-6(b)(2). Only one awardee is capable of providing the supplies or services required at the level of quality required because the supplies or services ordered are unique or highly specialized.

5. Supporting Rationale of the Exception.

The rationale for this exception is driven by highly specialized technical requirements, severe time constraints tied to uncertain funding, and the operational limitations of the contracting activity.

Specifically, the required IT supplies must operate seamlessly within the Coast Guard Academy's unique .edu domain. This environment introduces complex architectural variability, compliance standards, and operational configurations fundamentally distinct from standard Coast Guard or DoD .mil networks. The USCGA .edu environment is operationally distinct from standard Coast Guard .mil environments because it supports academic instruction, cadet technology use, faculty collaboration, classroom systems, and education-specific network requirements. The contractor already supporting this environment has knowledge of the Academy's current technical baseline, ordering

requirements, security controls, device standards, and operational support model. Acquiring the supplies through the existing contract minimizes integration risk and helps ensure that the hardware is compatible with established Academy standards.

Furthermore, the execution of this procurement is entirely contingent upon the availability of questionable, end-of-year funding. Because funding is uncertain, there is insufficient lead time to draft a new solicitation, evaluate proposals, and recompete this requirement. Attempting a full and open competition under these constrained, contingent timelines would result in a failure to execute critical funds before expiration. This failure to execute immediately upon the availability of funds would result in the Coast Guard's inability to acquire the required supplies, leading to degraded network services for cadets and faculty during the academic semester.

Additionally, competing this requirement would result in a substantial duplication of costs that the Government is not expected to recover. This duplication is driven by current contracting staff limitations, as resources are heavily constrained while actively working on the recompete of a comprehensive, overarching buy. Diverting limited staff to compete an additional, highly specific contract under these conditions is administratively unfeasible and represents an unacceptable duplication of effort. Consequently, a sole-source award is the only viable method to prevent critical infrastructure failure.

6. Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable.

The Contracting Officer determined the proposed prices to be fair and reasonable based on price analysis IAW FAR 15.404-1(b), using commercial catalog and published website pricing.

7. Description of Market Research.

Market research was conducted by reviewing existing Coast Guard contracts, DHS Strategic Sourcing Vehicles, GSA Advantage, NASA SEWP, and various commercial catalogs and manufacturer websites. This comprehensive review was performed to verify the commercial availability of the required products and to critically analyze the procurement lead times associated with each venue relative to our constrained funding timeline.

8. Other Facts Supporting the Use of Other Than Full and Open Competition.

No other facts.

9. Actions, if Any, the Agency May Take to Remove or Overcome Any Barriers to Competition Before Any Subsequent Acquisition for Supplies or Services Required.

The acquisition team is currently conducting comprehensive market research for a competitive follow-on procurement to replace contract 70Z02322FCGA00002. As part of this forward-looking acquisition strategy, the team is analyzing methods to consolidate both the core services and the acquisition of associated hardware and IT supplies unique to

the Academy's .edu domain into a single, comprehensive contract vehicle. By expanding the scope of the upcoming competitive solicitation to include hardware on an "as-needed/as-funded" basis, the Coast Guard will establish a pre-competed contract to rapidly execute hardware requirements when various funding is available. This consolidated strategy directly removes future barriers to competition by eliminating the need for urgent, fragmented, sole-source IT supply actions, allowing all qualified vendors to compete for the Academy's holistic .edu domain needs.

10. Technical/Requirements Personnel Certification.

I certify this requirement meets the Government's minimum need and that the supporting data, which forms a basis for this justification, is complete and accurate.

[redacted]

[redacted]

11. Contracting Officer's Certification and Approval

I certify that the data supporting the recommended use of other than full and open competition is accurate and complete to the best of my knowledge and belief.

[redacted]

[redacted]