[redacted]

SPRDL1-25-R-0187 (JA-01076)
Previous J&A: SPRDL1-10-R-0282 (Not available)

JUSTIFICATION AND APPROVAL
FOR OTHER THAN FULL AND OPEN COMPETITION
SPRDL1-25-R-0187

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 Kearfott Guidance and Navigation Corp (Kearfott), Commercial and Government Entity (CAGE) 05088, or an offeror providing the product of the approved source, for Component Board Assembly (Assembly), National Stock Number (NSN) 5998-01-587-1812, Part Number (PN) 13012999, using Army Working Capital Funds.

3. **Description of Supplies/Services:** The Assembly, used on the M1 Abrams Tank, uses a DC-DC converter to control and stabilize input power, delineates this input power into various voltages via regulators and inverters, and distributes power via output terminals to the Line of Sight (LOS) Electronics Assembly. The deliverable for this contract is for a quantity of 54 each with no option requirement. 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):
B - Acquisition of this part is restricted to source(s) specified on "Source Control", "Altered Item" or "Selected Item" drawings/documents.

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 (FAR) 6.302-1 Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements.

5. **Reason for Authority Cited:** The Assembly is a critical part of the LOS Electronics Assembly in M1A1 FOV, M1A2 [redacted], M1A2K [redacted], and the M1A2S [redacted] Abrams Tank Systems. The Assembly is required to comply with multiple specifications and pass the extensive testing procedures outlined in [redacted] which describes the specific electrical functions of the Assembly, the performance requirements of each function, and the environmental conditions under which testing will occur.

The most rigorous and costly testing requirements are Shock Testing, Nuclear Hardness and Survivability Testing (NH&ST), and Electromagnetic Interference (EMI) Testing. Shock Testing will be used to prove the Assembly's performance after undergoing various shock impulses, including live-fire gun shocks inside an M1 Abrams

[redacted]

[redacted]

Tank. NH&ST will test whether the Assembly can withstand and operate in a nuclear threat environment. EMI Testing will test whether the Assembly can meet performance requirements while subject to electromagnetic interference from nearby electronics.

The Government has limited rights to the Technical Data Package (TDP). Additionally, the TDP is not fully defined, as the Government's source control drawing (13012999), does not contain sufficient information to manufacture the Assembly. The current design and manufacturing procedures were entirely developed and tested by Kearfott. Additionally, Kearfott owns the rights to their design and has successfully met all testing requirements outlined in [redacted]. No contractor, other than Kearfott has thus far been authorized to manufacture and sell the Assembly to the Government.

Due to the limited technical data available, Reverse Engineering is the only recourse for the Government to increase competition through the development of a competitive build-to-print TDP. The table below is a cost estimate to Reverse Engineer the Assembly. All totals are estimates made by Subject Matter Experts (SME) at U.S. Army, Combat Capabilities Development Command (DEVCOM).

Duplication of Cost through Reverse Engineering

Activity	*SME Cost Estimate*
Reverse Engineering Qualification Procedures Engineering Analysis NH&ST	[redacted]
TOTAL:	[redacted]

The Government would not be able to recover the duplication of costs involved in Reverse Engineering the item to create a competitive TDP through subsequent competition and within a reasonable time frame. At the current average usage rate of [redacted] units each year, 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 validating a competitive TDP or qualifying another source.

6. Efforts to Obtain Competition:

a. Effective competition: Due to the reasons cited in Section 5, the Government is not pursuing competition for this item. The notices required by FAR 5.201 shall be published, and any bids or proposals received shall be considered.

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, and "Competition in Subcontracting", 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 and was open for 15 days. One response was received.

DEVCOM Engineering completed market research on 29 May 2025 by performing an internet search for the NSN, PN, and Nomenclature. The search was conducted using Google, Ability One, UNICOR, and Haystack Gold to find existing suppliers. None of these resources yielded any meaningful results. There may be other companies capable of manufacturing this item, but the Government is not aware of any company, other than Kearfott, that possesses a fully developed TDP capable of meeting performance requirements.

9. Interested Sources: As stated in Section 8, in response to the Sources Sought Notice, BHPE LLC (CAGE 9SWS7) expressed interest in this acquisition effort. BHPE however does not appear to currently have the technical data necessary to produce the Assembly. Furthermore, the contractor would be required to apply for source approval and have its product qualified before it could competitively make an offer. As the item is managed by the U.S. Army Tank-Automotive & Armaments Command (TACOM), the contractor was directed to contact the TACOM Ombudsman Directorate to help assist in compiling the necessary information needed to make informed decisions on whether to proceed with the source approval process for this item. The contractor was also provided the website to learn more about the Source Approval Program (https://tacom.army.mil/ombudsman/sap).

10. Other Facts: Procurement History:

Contract Number: SPRDL1-11-C-0128
Award Date: 11 August 2011
Contractor: Kearfott Corporation
Contract Value: $1,701,648.00
Competitive Status: FAR 6.302-1 only one responsible source

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: ENG Branch Chief
Signature:

7/24/2025

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: Sourcing Division Chief
Signature:

7/30/2025

X [redacted]

Signed by: USA

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 not be required to submit certified cost or pricing data as the expected value of this procurement does not meet the threshold. This item has been determined to be an other than commercial product.

Name: Ralph McCarthy
Title: Contracting Officer
Signature:

7/24/2025

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: Ralph McCarthy
Title: Contracting Officer
Signature:

7/24/2025

X Ralph McCarthy

Signed by: MCCARTHY.RALPH.FITZGERALD[redacted]

[redacted]

SPRDL1-25-R-0187 (JA-01076)
Previous J&A: SPRDL1-10-R-0282 (Not available)

Approval Authority for Acquisitions Greater Than $750K 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: Component Board Assembly

b. NSN: 5998-01-587-1812

c. Basic Quantity: 54 Each

d. Basic Estimated Value: $[redacted]

e. Option Percentage: 0%

f. Total Estimated Maximum Value with Option: $[redacted]

This action will be awarded on an Other Than Full and Open Competition basis 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:

8/1/2025

X Jamie Wiebusch

Signed by: DLA
Competition Advocate

[redacted]