JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION (JOFOC) FOR COMMERCIAL PRODUCTS/SERVICES OVER THE SIMPLIFIED ACQUISITION THRESHOLD (SAT) USING SIMPLIFIED PROCEDURES AUTHORITY: Revolutionary FAR Overahul (RFO) 12.102(b) and 41 U.S.C. 1901

Solicitation #: 140D0426Q0309

1. **Identification of the agency and the contracting activity, and specific identification of the document as a ““Justification for other than full and open competition.”**

This document is a Justification for Other than Full and Open Competition (JOFOC) for the Department of the Interior (DOI), Interior Business Center (IBC), Acquisition Services Directorate (AQD) Division II, Branch V, in support of Office of Aviation Services (OAS), Unmanned Aerial System (UAS) Fleet.

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

This JOFOC is in support of a new supply requirement to establish a sole source Blanket Purchase Agreement (BPA) for the procurement of Easy Aerial Tethered UAS. The intent is to award a sole source Firm-Fixed-Price (FFP) BPA to Easy Aerial Incorporated (Inc).

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

a. DOI is responsible for managing and protecting America’s natural resources, including land, water, wildlife, and energy. The missions required to fulfill this DOI responsibility can be hazardous to government personnel, must be conducted on a continuous basis, and must minimize impacts to vegetation, wildlife, and visitors on public lands.

b. In support of these missions, OAS requires Tethered UAS with the capabilities to support incident response operations associated with dams, power plants, hydroelectric facilities, and Bureau of Reclamation (BOR) managed lands. The primary purpose of these UAS’s is to provide continuous aerial surveillance and monitoring during incidents involving hydrologic flows, dam safety concerns, security breaches, and natural disasters. The aerial surveillance can be conducted persistently while mounted on moving vehicles, which is relatively uncommon on the tethered UAS market. The UAS system can launch, hover, and recover while the host vehicle is moving. Most tethered drones require a stationary base station, level terrain, and controlled deployment conditions. Having this capability enables persistent overwatch, enhances situational awareness, and improves decision-making by providing real-time data and access to areas that may otherwise be inaccessible. Ultimately, Easy Aerial UAS is designed

specifically for first responder vehicles and mobile command units which increases personnel safety while improving operational efficiency and reducing overall costs to DOI.

c. OAS requires Easy Aerial Tethered UAS (specifically the Easy Lite+ and Easy Mobile) which are currently the only UAS(s) on the market that offer the below technical specifications and payloads necessary to successfully execute DOI's mission:

- Ability to tether at least 300'
- UAS total weight under 55lbs
- Operate in adverse weather conditions
- Operating temperature limitations of at least 0°- 110° F
- Operate in sustained wind speed of at least 20kts
- Flight time of 24+hrs while Tethered
- Rapid Deployment Capability
- Capability to operate by Ground Control Station (GCS) and Remotely
- Ability to share real-time live streaming feed via weblink
- Mobile and semi-stationary system solution
- Equipped with anti-collision lighting for nighttime use
- Application Programming Interface (API) Integration CX

- UAS Payloads:

  - Electro Optical/ Infrared (EO/IR) Cameras: NextVision DragonEye2, Nighthawk2-UZ, NightHawk2-V and Raptor
  - Digital Military Radios: Baseline Radio (Microhard 2.5GHz pMDDL2450) Persistent Systems MPU5 and Silvus SC4200
  - Counter UAS (cUAS) Radar: EchoFlight Radar Echodyne, Osprey Heavy (Single and Dual Radar Configuration)

d. The Independent Government Estimate (IGE) is [redacted]. The BPA will be established with a [redacted] ceiling and a five-year ordering period.

4. An identification of the statutory authority permitting other than full and open competition.

This is an acquisition conducted under the authority of the Simplified Procedures for Acquisition of Commercial Products and Commercial Services. The statutory authority permitting restricting competition is 41 U.S.C 1901 as implemented by RFO 12.102(b). (Value > SAT ≤ $9 million)

5. **A demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires use of the authority cited.**

a. Easy Aerial Inc. is the manufacturer and currently the only supplier/seller of the required brand name Easy Lite+ and Easy Mobile UAS(s). There are no other products currently on the market that meet the capabilities required to support DOI's mission. Specifically, other products on the market do not meet the required payloads (EO/IR, Radio and Radar capabilities) which are necessary for providing aerial surveillance and monitoring with real-time visibility/live data, thermal imagery and rapid/instant communications relay.

b. In addition to providing the unique capabilities, the Tethered UAS products manufactured by Easy Aerial Inc. comply with the following Government Requirements:

- FAR Clause 52.240-1, Prohibition on Unmanned Aircraft Systems Manufactured or Assembled by American Security Drone Act-Covered Foreign Entities.
- DOI's "Covered UAS" assessment guide as required by the 2024 National Defense Authorization Act (NDAA).
- Executive Order 13981 (Protecting the United States From Certain Unmanned Aircraft Systems).
- Secretary of Interior Order 3379 of acquiring UAS products designated and authorized by the Department of Defense's (DoD) Defense Innovation Unit (DIU) Blue small Unmanned Aerial System (sUAS). The DoD DIU provides a Blue UAS list of secure and trusted UAS for federal government operations. OAS Information Bulletin (IB)-No.22-1 approves the continued procurement of "cleared" Blue UAS list by the DIU for sUAS.

6. **A description of the efforts made to ensure that offers are solicited from as many potential sources as practicable, including whether a notice was or will be publicized as required by RFO part 5 and, if not, which exception under Part 5 applies**

To ensure compliance with RFO 5.101(d) Table 5-2, a sources sought notice (SSN) was posted through the System for Award Management (SAM) (i.e, SAM.gov) from 11/20/2025 – 12/19/2025 and a total of 10 sources responded including the brand name manufacturer and only supplier (Easy Aerial Inc.). Except for Easy Aerial Inc, none of the sources were determined as capable of being able to provide an equivalent product to the Easy Aerial's Tethered UAS. While some vendors proposed NDAA compliant UAS, none met the technical specifications/equipment capabilities (UAS with the required payloads) required to fully support OAS, specifically BOR's land management mission.

7. **A determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable.**

The Contracting Officer determines that the anticipated price(s) will be fair and reasonable based on available commercial pricing information for similar types of UAS that will permit realistic estimates of a reasonable price.

8. **A description of the market research conducted (see Part 10) and the results or a statement of the reason market research was not conducted.**

Market research included a search and review of several Government databases and websites (ie. Procurement List/Ability One, Federal Prison Industries/UNICOR, Federal Supply Schedules/GSA, Acquisition Gateway) for potential sources. However, these mandatory and non-mandatory sources for supplies required under RFO 8.103 revealed no potential sources. DOI sources prescribed under DOI-AAAP-0088 v11 (Mandatory Use Memoranda) and DOI-Wide Contract Solutions were also searched but these sources cannot provide the brand name Easy Aerial Tethered UAS. Based on the market analysis and SSN results, there is only one source (Easy Aerial) that can support this requirement due to their confirmation that they have no authorized re-sellers in the commercial market for the Easy Aerial Tethered UAS.

9. **Any other facts supporting the use of other than full and open competition, such as:**

This requirement cannot be modified to enhance competition since the design and capabilities of the Easy Aerial payloads fit the specific operational needs required by DOI. The use of any other UAS payloads will negatively impact the operational efficiency of DOI's mission by not being able to accomplish the intended task due to a mismatch between the payload and mission. From a technical perspective if the correct payload is not utilized the UAS may experience unstable hovering, excessive vibration, poor GPS hold (maintain stable/fixed position), slower response, loss of surveillance capability or difficulty maintaining altitude which will lead to mission failure. Easy Aerial platforms are fully NDAA compliant, and U.S. manufactured ensuring alignment with sourcing requirements. In addition, the system supports a wide range of modular payloads: electro optical, infrared, communications, environmental sensing, and other mission specific tools allowing seamless integration with payload options required for DOI's operational mission sets. The system is engineered for harsh, mission critical environments and provides reliable performance in adverse weather conditions.

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

The below sources expressed interest in this requirement. Upon review of the sources submitted responses, none of the sources (except for Easy Aerial) were determined as capable of being able to provide an equivalent product to the Easy Aerial's Tethered UAS.

Source/Vendor	Business Size	Capable (Yes/No)
(1) Aaceses Ihmire Industries	Small	No
(2) Dragonfly	Small	No
(3) Easy Aerial	Small	Yes
(4) Hoverfly	Small	No
(5) Outland Secure	Small	No
(6) Paladin Defense Services	Small	No
(7) Skyship Services	Small	No
(8) Trillium Engineering	Large	No
(9) Vigil Vector	Small	No
(10) Zenith Aerotech	Large	No

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

The Government will continue to review and evaluate DoD DIU Blue UAS list and other non-listed UASs that are NDAA compliant to see whether there are other UASs with similar/same payloads as the Easy Aerial Tethered that may be able to meet DOI's needs.

12. Contracting officer certification that the justification is accurate and complete to the best of the contracting officer's knowledge and belief.

I certify that this justification is accurate and complete to the best of my knowledge and belief.

[redacted] __
[redacted], Contracting Officer

13. Requirements personnel certification.

I certify that the technical data which forms a basis for this justification is complete and accurate and meets the Government's minimum needs.

[redacted] _
[redacted], OAS UAS Fleet Manager

14. Reviews and Approvals

Approve

[redacted]
[redacted], Head of the Contracting Activity