NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION
(JOFOC)
For ASTM Standards Access – Agency-Wide Subscription
Solicitation 80MSFC26Q0005

1. **Federal Acquisition Regulation (FAR) 6.104-1(a)(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 prepared by National Aeronautics and Space Administration (NASA) MARSHALL SPACE FLIGHT CENTER (MSFC).
   The procuring agency is NASA, and the contracting activity is MSFC Office of Procurement.

2. **FAR 6.104-1(a)(2) – The nature and/or description of the action being approved:**
   This justification provides the rationale for contracting by other than full and open competition to award a contract to ASTM International for enterprise-wide access to ASTM Standards under other than full and open competition in accordance with FAR 6.103-2, Unusual and Compelling Urgency. This is not a sole-source action. NASA conducted an accelerated competition among four (4) qualified providers capable of delivering immediate, authoritative ASTM standards access. The total estimated value is $333,000.

3. **FAR 6.104-1(a)(3) – A description of the supplies or services required, to meet the Agency's needs (including the estimated value):**
   NASA requires uninterrupted access to ASTM engineering and technical standards to support mission-critical engineering, NASA Technical Standards System (NTSS) operations, the Office of the Chief Engineer (OCE) Technical Standards Program (WBS 811540), safety and mission assurance functions, and design and verification activities across all NASA Centers. Services required include: Authoritative ASTM standard documents,

- Publisher-authorized enterprise licensing
- Historical versions and archives
- Redline and revision tracking
- Search and cross-reference capabilities
- High-availability access and continuity capability
- Enterprise authentication controls

Period of performance: August 16, 2026, to August 15, 2027. The total estimated value is $333,000.

4. **FAR 6.104-1(a)(4) – An identification of the statutory authority permitting other than full and open competition:**
   The statutory authority permitting other than full and open competition is 10 U.S.C. 3204(a)(2) — Unusual and Compelling Urgency, as implemented by FAR 6.103-2 – Unusual and Compelling Urgency.

5. **FAR 6.104-1(a)(5) – A demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires use of the authority cited:**
   The rationale supporting the use of 10 U.S.C. 3204(a)(2) is the late-stage notice from the incumbent vendor resulted in an unplanned loss of ASTM standards access from the upcoming Option Two; which eliminated normal procurement lead time. Immediate restoration is required to:

   - Prevent schedule delays in mission engineering
   - Avoid compliance gaps in standards-based technical work
   - Support OCE Technical Standards and NTSS operational requirements
   - Maintain safety, design, test, and verification activities

   Delays inherent to full and open competition (synopsis, proposal time, evaluation cycles) would result in serious injury to the Government. FAR 6.103-2 criteria are met.

6. **FAR 6.104-1(a)(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 Subpart 5.1 and, if not, which exception under 5.101 applies:**

Although full and open competition was not feasible, NASA achieved maximum practicable competition under urgent conditions:

- Five (5) qualified sources were identified
- Information and pricing were requested
- Four (4) sources responded
- NASA conducted technical and pricing evaluations
- ASTM International was selected as the LPTA (Lowest Price Technically Acceptable)

Pre-award synopsis was waived under FAR 5.102(b)(2) due to urgency.

7. **FAR 6.104-1(a)(7) – A determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable:**

Price reasonableness is supported by:

- Comparison of four (4) independent competitive offers
- Market alignment for publisher-authorized ASTM enterprise licensing
- Independent Government Cost Estimate (IGCE)
- Review under FAR 15.404-1(b)(2)(i)

Adequate price competition exists; certified cost or pricing data is not required (FAR 15.403-1(b)(1)).

8. **FAR 6.104-1(a)(8) – Description of the market research conducted, and the results, or a statement of the reasons market research was not conducted (e.g., urgent, and compelling requirement):**

Market research conducted under FAR Part 10 found:

- Only a limited number of suppliers/vendors are authorized to provide ASTM content
- Only a subset offers enterprise licensing with historical archives
- NASA obtained technical information and pricing from four (4) sources
- All four demonstrated immediate capability

Urgency prevented expanded market research.

9. **FAR 6.104-1(a)(9) – Any other facts supporting the use of other than full and open competition:**

ASTM standards underpin NASA's engineering design, safety, materials selection, fabrication, testing, and verification activities. Loss of access creates:

- Program delays
- Noncompliance with required standards
- Technical authority disruptions
- Increased mission risk

Immediate award is required.

10. **FAR 6.104-1(a)(10) – A listing of the sources, if any, that expressed an interest in writing in the acquisition:**

Responses were received from four (4) sources/suppliers:

1. ASTM International (selected) - Commercial Vendor
2. [redacted] Center ([redacted]
3. [redacted] - Commercial Vendor
4. [redacted] - Commercial Vendor

11. **FAR 6.104-1(a)(11) – A statement of 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:**

NASA/MSFC will:

- Maintain a validated multi-vendor pool for future competitions
- Require advance notification of performance issues from vendors
- Conduct full and open competition when schedule permits
- Continue evaluating emerging commercial platforms for ASTM access