Justification & Approval
For Other than Full and Open Competition

As a legislative branch agency, the Library is subject to the competition and advertising requirements of 41 U.S.C. § 6101. Like the Competition in Contracting Act and the FAR, 41 U.S.C. § 6101 does not require competition when a contracting officer certifies that only one source or brand-name item is available, when dictated by public exigency, or when otherwise authorized by law.

This document sets forth the justification and approval for award of a contract or order by means providing for other than full and open competition per 41 U.S.C. § 6101, LCR 7-210, and, as applicable, FAR 6.302, FAR 13.106-1, FAR 8.405, and FAR 16.505. Contracting without competition shall not be justified on the basis of a lack of advance planning or concerns related to availability of funds.

This form shall be used to support instances where competition will be limited to a single source, a limited number of sources, including where a brand name product is required.

Part 1 – Identification

1. Contracting Agency and Activity: Library of Congress, RCS, NAVCC Packard Campus, Film Preservation Laboratory

2. Nature of Action Being Approved

☒ Contract (or modification)
☐ LoC or Leg Branch Order (or modification)
☐ GSA Schedule or GWAC: /Contract
☐ Other:

Plan ID Number:
Contractor (or Brand Name): Video and Film Solutions
Estimated Value (Base and all options): [redacted]
Period of Performance: 11/01/2026-10/31/2031

3. Description of Supplies or Services Required to Meet Library Needs

Describe the supplies or services that are required to meet the Library's minimum needs and the delivery schedule required to meet those needs. Do not focus on a description of the program.

The Library requires the following supplies or services:

The Library of Congress (Library) requires contractor support to provide periodic preventative maintenance of vintage equipment used at NAVCC, its facility in Culpeper, Virginia. The Packard Campus for Audio Visual Conservation maintains an archival film preservation laboratory tasked with housing, restoring and making accessible to the public the world's largest collection of motion picture films. The film lab consists of a preparation area with nine (9) inspection stations, as well as a range of historic and contemporary equipment used in the preservation of historic film formats. The film lab makes extensive usage of contact and optical printers. The film lab is supported by nine staff members.

Contractor shall provide periodic maintenance services, and equipment repair services, for the NAVCC film preservation equipment, both historical and contemporary. Contractor shall provide qualified technicians to perform these maintenance and repair services, in accordance with the requirements of the contract.

The contractor shall provide the following services for the equipment:

• Preventative maintenance. Contractor shall provide preventative hardware maintenance and adjustments to Library equipment according to the equipment manufacturer's recommended requirements.

• Equipment repair. Contractor shall provide equipment repair services.

• Distance Support. Contractor shall provide troubleshooting assistance via phone, FaceTime and/or email for hardware-related issues on covered equipment.

• Parts Supply.
Contractor shall locate and acquire spare parts at COR direction.

Part 2 – Program Office Justification & Approval

4. Authority for Contracting Without Competition Over $350,000

For this requirement over $350,000, under FAR part 6, the basis for contracting without providing for full and open competition is:

☐ There is only one responsible source and no other supplies or services will satisfy Library requirements. 41 U.S.C. § 6101(b)(2)(C); FAR 6.302-1.
- ☐ Library's minimum needs can only be satisfied by contractor's unique capabilities or products. FAR 6.302-1(b)(1).
- ☐ Source controls copyrights, patents, raw materials, or secret processes cannot be acquired otherwise, or similar circumstances. FAR 6.302-1(b)(2).
- ☐ Other exception identified in FAR 6.302-1:

☐ There is such unusual & compelling urgency that the Government would be seriously injured if competition is not limited. 41 U.S.C. § 6101(b)(2)(B); FAR 6.302-2. Option years are not permitted.

☐ Source is expressly authorized or required by statute (e.g., AbilityOne, UNICOR, GPO, GSA Public Buildings Service, Appropriations Act, etc.) per 41 U.S.C. § 6101(b)(1) and FAR 6.302-5:

☐ Other basis authorized in 41 U.S.C. § 6101(b) or FAR part 6.302:

☐ Library's needs can only be satisfied by a brand-name product or item which is essential to the Government's requirement. FAR 6.302-1(c).

☐ The Product is listed on the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

Up to and including $350,000

For this requirement up to $350,000, using simplified acquisition procedures under FAR part 13, the basis for contracting without providing for full and open competition is:

☒ Only one responsible source is reasonably available to meet Library requirements. 41 U.S.C. § 6101(b); FAR 13.106-1.
- ☒ Product or service is reasonably available from only one source.
- ☐ Source controls copyrights, patents or other exclusive licensing arrangements.
- ☐ Urgent circumstances; only one source can reasonably deliver by required date. Option years are not permitted.
- ☐ Source is expressly authorized or required by statute:

☐ Library's needs can only be satisfied by a brand-name product

☐ The Product is listed the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

GSA Schedule Order

For this GSA schedule order under FAR part 8, the basis for not competing among GSA schedule-holders and/or specifying a brand name product or item is:

☐ An urgent and compelling need exists, and following GSA procedures would result in unacceptable delays. FAR 8.405-6(a)(1)(i)(A).

☐ Only one GSA source is capable of fulfilling the requirement at the level of quality required because the supplies or services are unique or highly specialized. FAR 8.405-6(a)(1)(i)(B).

☐ In the interest of economy and efficiency, the new work is a logical follow-on to an original order that was placed competitively among GSA schedule-holders (i.e., the original order was not sole-source or limited-source.) FAR 8.405-6(a)(1)(i)(C).

☐ Library's needs can only be satisfied by a brand-name product

☐ The Product is listed on the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

Order Under Multiple Award Indefinite-Delivery Contract or GWAC

For this order under FAR subpart 16.5, the basis for contracting without providing for full and open competition is:

☐ The need is so urgent fair opportunity would result in unacceptable delays. 41 U.S.C. § 6101(b)(2)(C) and FAR 16.505(b)(2)(i)(A).

☐ The Library's minimum needs can only be satisfied by contractor's unique capabilities or products. 41 U.S.C. § 6101(b)(1) and FAR 16.505(b)(2)(i)(B).

☐ A logical follow-on order in the interest of economy and efficiency. 41 U.S.C. § 6101(b)(1) and FAR 16.505(b)(i)(2)(C).

☐ To satisfy a minimum guarantee. 41 U.S.C. § 6101(b)(1) and FAR 16.505(b)(2)(D).

☐ Authorized or required by statute. 41 U.S.C. § 6101(b)(1) and FAR 16.505(b)(2)(E).

☐ The Library's minimum needs can only be satisfied by a brand-name product or item which is essential to the Government's requirement. 41 U.S.C. § 6101(b)(2)(B) and FAR 16.505(a)(4)(i).

☐ The Product is listed on the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

5. Rationale for Contracting Without Competition

In supporting an action not providing for full and open competition, it is not sufficient to demonstrate that the contractor is exceptionally well qualified or even the best qualified, or that the required brand name product is well suited to the Library's needs. The rationale must demonstrate that no one else, or no other competing product, can satisfactorily fulfill the Library's requirement. Do not focus on the importance of the requirement; the issue is the rationale for not competing.

In supporting urgency, address the following: What are the unexpected facts or the unpredictable events that led to this situation? When is the required delivery or performance start date? Why this date? What specific harm to the Government will occur if the delivery is not made or performance not begun as scheduled? (Note that expiration of funds is not sufficient harm to justify not competing.) Demonstrate that the contract is only for items and quantities urgently needed until a competitive procurement action can be developed, or that a separate competitive follow-on is not practical.

In supporting a brand name justification, the brand name or feature must be essential to the Library's requirements, and market research indicates that other company's similar products or products with similar features cannot meet or be modified to meet the Library's needs.

We are authorized to limit competition on the basis of the citation in section 4 because:

Regrettably, film photochemical preservation, as well as the necessary equipment for supporting it, is in decline. The task of locating skilled technicians to maintain film lab equipment is growing more challenging. Based on market research, past requests for information and requests for proposals, we have pinpointed just one contractor operating in our region.

Only a few film laboratories globally remain engaged in the preparation, printing, and processing of film, with the majority being commercial labs. Among these, Fotokem (located on the West Coast) and Colorlab (located on the East Coast) stand out as the two most prominent commercial labs in the United States. Both film lab facilities have dedicated personnel responsible for servicing and maintaining their equipment. Consequently, there is virtually no market for such skilled technicians outside of the commercial lab sector. The owner of Colorlab, Tommy Ascenbach saw the opportunity with this hole in the market and started a 2nd company (Video and Film Solutions) which focuses on the servicing of motion picture film lab equipment. Fotokem listed above offers no such service.

The contractor's location is also a crucial factor as it impacts both cost considerations and the capacity to promptly repair vial equipment. We've managed to identify just a single contractor who is geographically nearby and possesses the necessary expertise along with up-to-date experience in maintaining the critical equipment essential for film lab operations. This contractor, Mr. Tommy Aschenbach of Video and Film Solutions, stands as the sole eligible option. In the absence of a service agreement with a qualified technician located in close proximity to the lab to address unforeseen situations, the film lab faces the potential risk of failing to meet its mission-critical objectives.

6. Actions to Overcome Barriers to Competition Before Subsequent Contract Is Required

State what actions, if any, the program office can take to overcome barriers to competition before a contracting for this requirement again, such as: using action to provide time to develop specifications for a competitive procurement by a certain date; licensing copyrights or patents so other contractors may use the works; or breaking the requirement into parts that may be purchased competitively. If this is a one-time requirement, explain that action to increase future competition is not needed. If the source is expressly required by statute, state "Source is statutory."

To increase competition, we will:

The film lab would welcome greater competition for this service contract, but regrettably, the field of film photochemical preservation, as well as the equipment required to support it, is in decline. This particular equipment is no longer manufactured, making it increasingly challenging to locate qualified individuals for servicing the film lab equipment. Nevertheless, we remain committed to reaching out to industry partners in our ongoing efforts to identify additional sources. We will continue to monitor the commercial marketplace for potential alternatives.

7. Program Office Certification

I certify that the description of the Government's minimum needs, schedule requirements, and technical information that provide the basis for this justification are accurate and complete.

[redacted]	[redacted]	[redacted]	2/12/2026
Name	Title	Signature	Date

3 – CONTRACTING OFFICER DETERMINATIONS & CERTIFICATION

8. Efforts to Solicit from As Many Potential Sources As Practicable

Unless a justification is based on FAR 6.302-2, Unusual and compelling urgency, contracting officers shall post justifications for other than full and open competition, including brand name justifications, to the Contract Opportunities website on sam.gov (or eBuy for Brand Name Justifications under FAR Part 8) prior to requesting a proposal or otherwise entering into negotiations.

☒ Advance notice will be published in sam.gov for 15 days before a contract is awarded. FAR 5.203(a).
☐ Advance or concurrent notice will be published in sam.gov for a reasonable time for commercial items FAR 5.203(a) and 12.204(b).
☐ Advance notice will not be published because the action meets the following FAR exception:
- ☐ Notice would compromise national security. FAR 5.202(a)(1).
- ☐ Unusual and compelling urgency; notice period would seriously injure Government. FAR 5.202(a)(2).
- ☐ Expressly authorized or required to be made through another Government agency. FAR 5.202(a)(4).
- ☐ Order will be placed against an IDIQ contract awarded under FAR 16.5. FAR 5.202(a)(6).
- ☐ Order will be placed against GSA schedule or other competitively-awarded contract. FAR 5.202(a)(11).
- ☐ Other:

☐ Advance notice will not be published per 41 U.S.C. § 6101; see attached deviation from the FAR per LCR 7-210 § 3.A.

We made the following efforts to interest potential sources in this award: Publicly posted intent to sole-source to SAM.gov.

9. Listing of Sources That Expressed Interest in Writing

The following sources expressed interest in this award: TBD.

10. Additional Information

The following additional information is relevant to this justification and approval: None.

11. Contracting Officer Determination that Price Is Fair and Reasonable

As explained in detail below, I have determined that the prices for this contracting action are fair and reasonable based on comparison of the prices to the following (see FAR 15.404-1(b)(2)):

☒ Historical prices paid by the Government
☒ Library's Independent Government Estimate
☐ Other:
☐ Published competitive price lists
☐ Prices obtained through market research
☐ Prices obtained through competitive proposals

The following analysis (based on attached pricing information) supports my determination: Fair and reasonable pricing will be determined at time of award.

12. Contracting Officer Determination of Responsibility

☒ Checked System for Award Management (or will check in the case of competitive proposals for a brand name product)

13. Contracting Officer Determination of Best Value

I have determined that this action represents the best value to the Government because: Best value will be determined at time of award.

14. Contracting Officer Certification

I certify that, to the best of my knowledge and belief, this justification is accurate and complete. For those actions up to $900,000, I approve contracting without competition for this requirement.

Brian Curl	Curl, Brian Digitally signed by Curl, Brian Date: 2026.07.29 13:56:50 -04'00'	07/29/2026
Name	Signature	Date