JUSTIFICATION REVIEW DOCUMENT
FAR Part 6 Justification and Approval
for Other Than Full and Open Competition

Program/Equipment: Simplex Fire Alarm System

Authority: Title 10 U.S.C. §3204(a)(1) as implemented in RFO Federal Acquisition Regulation (FAR) 6.103-1(d), "Application for brand-name descriptions". (RFO Defense Federal Acquisition Regulation Supplement (DFARS) 206.103-170(c).

Amount: [redacted]0

Prepared By:	SSgt Emily Scully Contract Specialist E-mail: emily.scully.1@us.af.mil	Phone: (309)633-5204 Date:16 July 2026
Contracting Officer	1st Lt Nicholas Marzinzik Contracting Officer Email: nicholas.marzinzik@us.af.mil	Phone: (309)633-6239 Date: 16 July 2026
Technical:	1st Lt Benjamin Reed Base Civil Engineer Benjamin.reed.2@us.af.mil	Phone: (309)633-6172 Date: 16 July 2026
Requirements:	Mr. Keneth Herz Engineering Technician Kenneth.herz.1@us.af.mil	Phone (309)633-5565 Date: 16 July 2026

Reviews: I have reviewed this justification and find it adequate to support other than full and open competition.

Legal Counsel:
Robert C. Roth
Staff Judge Advocate
Phone: (217) 761-3366
E-mail- Robert.c.roth.civ@army.mil

Chief of the Contracting Office (CoCO):
Brent D. Keller
Supervisor Contract Specialist
Phone: (217) 761-3553
E-mail: brent.d.keller.civ@army.mil

1. **Requiring Activity:** 182nd Civil Engineering Squadron, 182nd Airlift Wing, Peoria, IL.

2. **Contracting Activity**: W50S7T – 182nd Mission Support Group/ Mission Support Contracting

3. **Description of Action:** Request that approval be made for a brand-name for fire alarm system upgrades. The current fire alarm system on base utilizes the Simplex system and the proprietary nature of this equipment and software only allows future upgrades in equipment and software through Simplex. Under National Fire Protection Association (NFPA) standards (NFPA 71) and Unified Facilities Criteria (UFC 3-600-01), mixing different manufacturers' internal Fire Alarm Control Panel (FACP) components, cards, or primary devices within a proprietary loop voids the system's Underwriters Laboratories (UL) listing and Factory Mutual (FM) approvals, which creates several life safety vulnerabilities and legal compliance issues.

4. **Description of Supplies/Services:** Remove and replace existing fire alarm panels in various buildings throughout the base in accordance with UFC 3-600-01 and ANG ETL 15-01-03 standards. Remove and replace existing initiating devices with addressable units. Upgrade all communication devices from existing fiber between buildings to COINv3 Ethernet compatible units. Replace existing TrueSite Workstations (TSW) with new, COINv3 compatible TSWs with upgraded graphics and nomenclature. All units will be installed, programmed and tested throughout each facility and at each TSW. Fire alarm panels and workstations shall be manufactured by Simplex to ensure compatibility and interoperability with recently installed systems throughout the base.

   Total Simplex Fire Alarm System brand-name requirement is estimated at [redacted]

5. **Authority Cited:** Title 10 U.S.C. §3204(a)(1) as implemented in RFO Federal Acquisition Regulation (FAR) 6.103-1(d), "Application for brand-name descriptions". (RFO Defense Federal Acquisition Regulation Supplement (DFARS) 206.103-170(c).

6. **Reason for the Authority Cited**: The description of the supplies or services required to meet the agency's essential characteristics as noted within RFO FAR 11.204(a)(1). "The particular brand name, product, or feature is essential to the Government's requirements, and market research indicates other companies' similar products, or products lacking the particular feature, do not meet the agency's needs or cannot be modified to meet the agency's minimum needs."

7. **Posting Requirements:** The justification will be posted with the solicitation (RFO FAR 5.201(c)(3).

8. **Contracting Requirements:**
   - **a.** Efforts to Obtain Competition: A sources sought notice was issued under Notice ID # A046565 on SAM.gov (published 9 July 2026) to assess the availability of qualified construction workers.

   - **b.** Interested Sources: Four (4) contractors replied to a sources sought notice under Notice ID # A046565 on Sam.gov to assess the availability of qualified contractors. Two contractors indicated their ability to subcontract to Johnson Controls and will be able to provide the Simplex system, One contractor stated they were interested but did not indicate the ability to obtain the Simplex System or subcontract and One contractor indicated they would be able to replace the whole system with a different manufacturer.

   - **c.** One of the Contractors able to subcontract with Johnson controls was a small business, the other response did not have a small business concern indicated on sam.gov. One contractor that expressed interest but was suggesting a different system was not registered in Sam.gov nor were they a small business. The last contract that expressed interest but provided no capability statement is a small business.

   - **d.** Actions to Increase Competition: The agency is committed to ensuring full and open competition for this requirement at the appropriate time. However, an immediate or phased-in transition to a non-proprietary, open-architecture system is not feasible for this action. As detailed in the Market Research section below, a complete system overhaul is financially prohibitive at this stage of the system's lifecycle. Furthermore, a piecemeal phase-in would

introduce unacceptable operational risks, including degraded emergency dispatch capabilities, failure points in the Mass Notification Warning System (MNWS), and a doubled cybersecurity burden. The agency will pursue a full and open competition for a non-proprietary replacement system when the current infrastructure reaches its programmed end-of-service life (est. FY36) via a planned Military Construction (MILCON) or major Sustainment, Restoration, and Modernization (SRM) project.

e. Market Research: Market research was conducted to assess both the availability of qualified contractors and the feasibility of alternative solutions, in accordance with RFO FAR Part 11.

A sources sought notice (ID # A046565) was posted on SAM.gov from 9 July 2026 to 16 Jul 2026 to identify contractors capable of meeting the requirement. This notice included the brand-name-specific Statement of Work.

In addition to the sources sought, the Government's market research analyzed the viability of utilizing non-proprietary alternatives. This analysis, conducted with the 182d Civil Engineering Squadron, concluded that a complete system overhaul or the use of open-standard conversion gateways is technically and financially unfeasible for the following reasons:

1. Technical Unfeasibility of Conversion Gateways: The use of open-standard conversion gateways to integrate third-party (non-Simplex) components into the existing proprietary network is technically unfeasible and presents an unacceptable life-safety risk. As stated in Section 3 of this justification, mixing manufacturers' components within this system voids the Underwriters Laboratories (UL) listing and Factory Mutual (FM) approvals. A hybrid network resulting from gateways would immediately fall out of compliance with National Fire Protection Association (NFPA 71) and Unified Facilities Criteria (UFC) 3-600-01, exposing the installation to severe life-safety vulnerabilities.

2. Financial Unfeasibility of a Complete Overhaul: A complete system overhaul is financially unfeasible at this stage of the system's lifecycle. The Independent Government Estimate (IGE) for this essential repair and upgrade is [redacted] By

comparison, a Rough Order of Magnitude (ROM) estimate to completely remove and replace the legacy fire alarm and mass notification infrastructure across all 38 facilities on the installation ranges between [redacted]. Executing a multi-million dollar total base replacement to avoid an [redacted] repair is not a fiscally responsible use of Government funds.

Other Facts:

f. RFO DARS PGI 206.103-170 content: "(d) Limitations: when utilizing the authority FAR 6.103-1 the contracting officer shall post a request for information or a sources sought notice, and shall include the results of this inquiry in the justification required by FAR 6.104."

9. **Technical and Requirements Certification**: I certify that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge and belief.

REED.BENJAMIN.ADDISON.1253021280 Digitally signed by REED.BENJAMIN.ADDISON.1253021280 Date: 2026.07.17 14:22:26 -05'00'

1st Lt Benjamin Reed
Base Civil Engineer

10. **Fair and Reasonable Cost Determination:** I hereby determine that the anticipated price/cost to the Government for this contract action will be fair and reasonable. I certify that this justification is accurate and complete to the best of my knowledge and belief.

MARZINZIK.NICHOLAS.ROBERT.1295754636 Digitally signed by MARZINZIK.NICHOLAS.ROBERT.1295754636 Date: 2026.07.17 14:46:01 -05'00'

1st Lt Nicholas Marzinzik
Contracting Officer

11. **Legal (Local):** I have reviewed this justification and find it adequate to support other than full and open competition.

ROTH.ROBERT.CHARLES.1089594509 Digitally signed by ROTH.ROBERT.CHARLES.1089594509 Date: 2026.07.20 10:27:30 -05'00'

Robert C. Roth
Staff Judge Advocate

12. **Chief of the Contracting Office (CoCO)**: I have reviewed this justification and find **I** adequate to support other than full and open competition.

KELLER.BRENT.DOUGLAS.1086683314 Digitally signed by KELLER.BRENT.DOUGLAS.1086683314 Date: 2026.07.21 06:00:47 -05'00'

Brent D. Keller
Supervisory Contract Specialist