JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION USING SIMPLIFIED PROCEDURES FOR THE ACQUISITION OF COMMERCIAL PRODUCTS AND SERVICES EXCEEDING THE SIMPLIFIED ACQUISITION THRESHOLD (AUTHORITY: 41 U.S.C. 1901)

Identification Number: REQUIREMENTS-26-3833

1. Identification of the agency and contracting activity.

The NOAA Acquisition and Grants Office (AGO) Eastern Acquisition Division (EAD), proposes to enter into a contract on the basis of other than full and open competition using simplified procedures for the acquisition of commercial services in support of the Office of Marine and Aviation Operations (OMAO), Portfolio Acquisition Executive (PAE) Platform Aircraft Division.

2. The nature and/or description of the action being approved.

NOAA intends to award a new Sole Source, Firm-Fixed Price (FFP) Purchase Order to Lockheed Martin Corporation Rotary and Mission Systems for essential L382J Aircrew Training Services to establish a certified baseline crew of pilots and loadmasters to successfully operate NOAA's forthcoming fleet of C-130J aircraft.

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

The requirement is to provide mandatory L-382J training services and corresponding materials specific to the C-130J aircraft platform through ground school academic classes, simulation sessions and ratings, and certifications required for NOAA personnel to operate the forthcoming C-130J aircraft. In addition, the training center and certification must adhere to the criteria specified within 14 CFR Part 141, *Pilot Schools,* and Part 142, *Training Centers.* This will provide OMAO with the necessary training essentials for maintaining compliance with safety requirements, governed by federal regulations, NOAA Administrative Orders (NAOs), and military standards (primarily under 41 CFR 102-33). This requirement will provide priority training services for the initial cadre of operators on NOAA's new C-130J aircraft via training line items funded at award and additional *optional* training line items available to exercise at any point within the three-year period of performance from September 30, 2026, through August 31, 2029. The Independent Government Cost Estimate (IGCE), for all the base and optional training line items, [redacted]

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

The statutory authority permitting this sole source acquisition is

a. 41 U.S.C. 1901, using simplified procedures up to $9M, in accordance with Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO) 12.201-1.

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

<u>Only one source</u> - Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized, identified below:

Lockheed Martin Corporation
Rotary and Mission Systems
100 Global Innovation Circle,

Orlando, Florida 32825-5002

Given the C130J aircraft platform is proprietary to the Original Equipment Manufacturer (OEM), Lockheed Martin (LM), the necessary training to operate such aircraft can only be provided through the sole source provider (LM). In addition, LM holds all copyright, licenses, schematics, and software coding ownership tied to these aircraft.

In addition to the above rationale, NOAA's first two C-130J aircraft are currently in the production phase at LM's Marietta, GA facility. Following production, LM will modify both aircraft to meet NOAA's unique missionization modifications, creating a NOAA-specific variant unlike any other. As such, it is imperative that the necessary training is provided by the OEM to maintain instructional integrity and standardization. Because the forthcoming aircraft are being acquired, and customized, by the OEM, obtaining initial training from the same source ensures continuity of uniform materials, expectations, and resources. This consistency is critical for pilot safety and overall flight mission success. Furthermore, aircraft acceptance is expected to occur in early 2029 for these first fully-modified C-130J aircraft, followed by the decommissioning of NOAA's current WP-3D Hurricane Hunter aircraft. Therefore, initial training certifications must be completed as soon as possible in order to ensure sufficient time to successfully, and safely, operate the newly acquired aircraft. An alternative vendor cannot provide this aircraft platform training herein, as it is proprietary to the OEM (LM) of this aircraft platform.

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

   This requirement is subject to the acquisition planning procedures outlined in RFO Part 5. As such, a Notice of Intent (NOI) to negotiate a Sole Source contract was posted to the Government-wide Point of Entry (GPE), Sam.gov, on June 1, 2026, with a closing date of June 16, 2026. The NOI included a brief summary of the requirements and invited interested parties to submit capability statements. No responses were received by the NOI deadline. A redacted copy of this justification will be made publicly available within 14 days after contract award, as required.

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

   Prior to award of the proposed contract, a price analysis will be performed and documented to sufficiently determine that the price to the Government of the proposed acquisition will be fair and reasonable. The Contracting Officer determines that the anticipated price will be fair and reasonable in accordance with RFO 15.404-1(b)(2), Comparison of the proposed prices to historical prices paid, for the same or similar items, and RFO 15.404-1(b)(5), Comparison of proposed prices with independent Government cost estimates.

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

   As detailed in Section 6 above, market research has been conducted by PAE and EAD to verify that the vendor provided herein is the sole provider capable of delivering training for the C-130J aircraft platform. No other sources were found to be capable of providing the requirement herein. Furthermore, the NOI was posted to SAM.gov and received no responses from interested or capable parties.

9. **Any other facts supporting using other than full and open competition.**

All facts have been documented herein. There are no additional facts to be reported in this section.

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

No sources indicated an interest after 16 days as a result of the NOI posted to SAM.gov on June 1, 2026.

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 conduct market research annually to gauge any changes to the marketplace regarding capabilities for future requirements. Should additional sources become available, the Government will seek competition for future acquisitions for these services.

12. CERTIFICATION

The JOFOC has been prepared and certified by:

Technical/Requirements Personnel:

I certify that the above narrative is accurate and contains complete data necessary to support the recommendation for other than full and open competition.

KEITH.DAVID.BENHAM.1405954318 Digitally signed by KEITH.DAVID.BENHAM.1405954318 Date: 2026.06.22 15:35:17 -04'00'

LCDR David Keith,
Contracting Officer Representative (COR) and
Deputy Director, PAE - Aircraft

Date

13. REVIEW

Review:

Office of General Counsel

Legal Sufficiency Email - 07/22/2026

Contract Law Division, Legal Counsel

Date

14. APPROVAL

Approve:

Contracting Officer

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

KOLB.JANA.LEIGH-ANN.1125231817 Digitally signed by KOLB.JANA.LEIGH-ANN.1125231817 Date: 2026.07.27 10:32:16 -04'00'

Jana Kolb,
Contracting Officer and
OMAO Branch Chief

Date