JUSTIFICATION AND APPROVAL FOR
OTHER THAN FULL AND OPEN COMPETITION
10 U.S.C. § 3205

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by Federal Acquisition Regulation (FAR) 12.102(b), FAR Class Deviation 25-21 Rev. 1 for FAR Part 12, FAR 6.103, FAR Class Deviation 25-11 for FAR Part 6 and in accordance with the requirements of RFO 6.104, the justification for the use of the statutory authority under RFO 6.103 is justified by the following facts and rationale required under RFO 6.104-1 as follows:

1. **Agency and Contracting Activity.**

   The Department of Homeland Security (DHS), United States Coast Guard (USCG), Operational Logistics Command (LOGCOM) Contracting Office proposes to enter into a contract on a basis other than full and open competition.

2. **Nature and/or Description of the Action being Approved.**

   (a) Nature of the action: USCG intends to procure on a sole source basis to meet Patrol Forces Southwest Asia (PATFORSWA) requirements to provide port space and pier services for rotating groups of two (2) Fast Response Cutters (FRC) in Singapore [redacted] Due to the ongoing conflict in the former patrol zone of the Gulf of Arabia, the Indo-pacific area of responsibility (AOR) has been established and the Toll Remote Logistics (TRL) Petroleum pier space [redacted] This action will allow the FRC fleet to utilize existing pier space and double up for scheduled Surface Fleet Logistics Command (SFLC) dockside maintenance packages.

   (b) Name and address of the contractor: Toll Remote Logistics (TRL)
   [redacted]
   CAGE Code: 14DL6
   SAM UEI: F2CAGTSYL9L8

   (c) Contract Type: Firm Fixed-Price Contract

   (d) Estimated total value (including options): $900,000

Period	Unit Price	Total
Award	$900,000	$900,000
Total		$900,000

(e) Type of funding: Operations and support funds

(f) Year of funding: Fiscal Year 2026

(g) Solicitation number: [redacted]

(h) Background information about the requirement: USCG PATFORSWA fleet has been assigned to work in the Indo-Pacific [redacted] Two FRCs currently undergoing long period maintenance (QL3) at the TRL facility is expected to continue into 09/30/2026. As an established work location, PATFORSWA will continue to utilize the existing pier space and double sets of FRCs for future cutter maintenance packages. SFLC has scheduled smaller maintenance periods to ensure FRC fleet maintains its mission and operational readiness. Products and services were previously awarded for QL3 services under purchase order 70Z08426PDL960008 Firm Fixed Price with variable quantities for specific task items for the period of performance dates 05/20/26 – 09/30/26.

3. **Description of Supplies/Services.** This action provides essential port services and logistical support required to establish and maintain the TRL pier location for SFLC maintenance of up to (4) operationally displaced Fast Response Cutters (FRCs). The requirement encompasses simultaneous mooring (doubling) alongside the other cutters, and utilizing already established space, security requirements, and shoreside services. Utility requirements include two 200-amp generators for shore power, as-needed potable water delivery, collection/holding/transfer (CHT) with grey water removal, and trash removal. Additional logistical support includes dedicated office and warehouse spaces with associated utilities, on-site forklift use for material handling, material transport, offload/onload of supplies and equipment and supplemental seabed sweeping by divers for security purposes and any additional pier side maintenance and ship services support. This comprehensive suite of services represents an increased level of critical support ensuring continuous dockside maintenance for restoring the vessels' operational readiness and sustaining the crews.

4. **Identification of Statutory Authority Permitting Other Than Full and Open Competition.** The statutory authority permitting other than full and open competition is 10 USC 3205/41 USC 1901 as implemented by RFO 12.102(b), and RFO 6.103 and in accordance with the requirements of RFO 6.

5. **Identification of Exception to the Buy American Statute.**
Not applicable as the award is for services and not for any supplies or purchases of articles.

6. **Demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires use of the authority cited.**

   a) SFLC scheduled dockside maintenance for FRC assets are critical to maintaining operational readiness of these assets. Following the evacuation from the Persian

Gulf, the cutter fleet is now [redacted] in Singapore. The cutters operational tasking remains fluid in the region and the dockside maintenance periods are essential to keeping the vessels operational.

b) Past performance of TRL at the specific pier location for the FRC fleet demonstrates their ability to provide all required moorings and services in support of a dockside maintenance period. No portion of the requirement can be segregated to allow for competition as this is a restricted access facility for TRL. Both sets of cutters will be undergoing the same maintenance packages at staggered intervals expected to last 2-3 weeks at a time and splitting the locations would cause unnecessary logistical complications and increased costs associated with operating across dockside sites for deployed SFLC personnel, maintenance contractors, and transportation of the required parts and equipment. [redacted]

c) TRL was the sole candidate that passed U. S. Navy (USN) security vetting during market research from previous solicitations for an initial temporary pier location. The previous survey of eleven (11) shipyard and port facilities demonstrated a widespread inability to meet the Government's minimum mission requirements and national security needs. [redacted] Proceeding with Toll to provide pier services for the 2-cutter dockside maintenance period also minimizes the lead time required for new security background checks or facility inspections to locate a new site, as well as all SFLC resources are already in place and working at the TRL pier location.

d) Approval of this sole-source justification is essential to ensure pier space and services already secured for SFLC dockside maintenance can be utilized to allow FRC fleet to double up for execution of their own maintenance packages. This action directly enables maintenance to be performed ensuring longevity and operational readiness of USCG FRCs. Failure or delay in availability of port space and services will have direct impact on maintenance periods, impacting cutters' capabilities to perform operations of national defense and global maritime security.

The use of the authority under 10 USC 3205/41 USC 1901 is necessitated by market research of the available Singapore port locations identifying only one responsible source and no other supplies or services are available to satisfy agency requirements. This sole-source acquisition is required as only one vendor can meet the agency's requirements in the port of Singapore.

- The identified source was Toll Government and Defense, Loyang Offshore Supply Base, which is a subsidiary entity of Toll Remote Logistics (TRL) USA Inc., another business entity under Toll Remote Logistics Pty Ltd., an Australian company that has been vetted by the Navy Supply Systems Command (NAVSUP) for a Husbanding Services Global Multiple Award Contract (GMAC) [Contract Number N68171-21-D-0033, UEI # M9LNTD9CFRM7, and CAGE ZAB92] for worldwide port services

to the USN, USCG, and other U. S. agencies with vessels. A review of TRL USA Inc. in SAM has determined that the vendor is considered a responsible and qualified business entity, and the company's representations and certifications were also reviewed. No other awards or contractor assessments were listed in FPDS-NG or CPARS for TRL USA Inc. but the parent company has plenty of past performance at satisfactory or better ratings under the Navy GMAC.

7. **Description of Efforts Made to Ensure that Offers are Solicited from as Many Potential Sources as is Practicable.** Effort was made back in March to identify and survey eleven different shipyard and port facilities in Singapore to assess the capability to meet the Government's minimum requirements in terms of security, space availability and "hotel" resources, and safety of USCG personnel and cutter assets.

   a) [redacted]

   b) No announcement was posted in SAM.gov regarding the requirement. Sources were identified and vetted by the Naval Criminal Investigative Service (NCIS). This survey of locations confirmed only one viable source existed, making further efforts to promote competition impractical and detrimental to the mission requirements.

   c) [redacted] J&A will be posted to SAM.gov in accordance with the RFO 6.301(b) requirement to post to the GPE within 14 days after the contract award.

8. **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 is fair and reasonable based upon TRL USA Inc.'s published rate sheet (fixed commercial pricing) and NAVSUP HSPortal IGE pricing data for port services in Singapore and both documents are included in the acquisition file.

9. **Description of Market Research.** Market research from previous solicitation and award was used in this requirement. A new market report was completed.

   a) Back in March, the federal government surveyed eleven (11) different shipyard and port facilities in the Singapore area. NCIS vetted the owners [redacted] as part of its efforts to conduct Threat Assessments of all available piers being considered. None of this research contributed to the Contracting Officer's fair and reasonable price determination as all piers other than TRL [redacted] were found to be technically unacceptable due to security assessments and ideological differences.

   b) Additional market research was not conducted as research conducted from previous solicitation/award was comprehensive and other considerations for ports outside of Singapore, like Subic Bay in the Philippines, were viewed as no longer viable due to having established SFLC dockside infrastructure and ongoing maintenance

contracting activity at the TRL pier. TRL management has also been very accommodating and able to fulfill all USCG requests.

c) TRL [redacted] has been identified as the only viable source to meet the needs of the six cutters at a reasonable price based upon a published commercial rate schedule and an IGE based upon services previously paid by the USN at the Singapore ports.

d) The immediate need to secure pier space and services for two FRCs on a rotational basis to ensure critical dockside maintenance can be performed requires an accelerated contracting process. Security protocols precluded any ability to seek full and open competition as there was only the one USN and USCG vetted vendor identified with the capability to support requirements and pass security assessments.

10. Any Other Facts Supporting the Use of Other Than Full and Open Competition. N/A

11. A Listing of the Sources, if Any, that Expressed, in Writing, an Interest in the Acquisition.

- A synopsis was never issued.
- Based on previous solicitation market research, various parties were identified by [redacted] the USCG PATFORSWA Supply Officer and NCIS agents who conducted an overarching threat assessment of all identified Singapore port locations.

12. A Statement of the Actions, if Any, the Agency May Take to Remove or Overcome Any Barriers to Competition Before Any Subsequent Acquisition for Supplies or Services Required.

(a) [redacted] This award will be for a short term period to cover requirements leading to the end of FY26 and a long term contract will be put into place for FY27 and forward.

13. Contracting Officer's Certification.

I certify that the data supporting the recommended use of other than full and open competition is accurate and complete to the best of my knowledge and belief.

[redacted] Digitally signed by [redacted]

07/20/2026
Date

Contracting Officer, LOG-961

14. Technical/Requirements Personnel Certification.

I certify this requirement meets the Government's minimum need and that the supporting data, which forms a basis for this justification, is complete and accurate.

[redacted]

Technical Representative

7/20/26

Date