

**New Requirement:
Contract to Assist the Federal Communications Commission for
ACP Consumer Education and Outreach Support Services
Limited Sources Justification**

The acquisition that is the subject of this limited-sources justification is conducted under the authority of the Multiple-Award Schedule (MAS) Program. 40 U.S.C. § 501. Limitation of sources is justified on the following facts, rationale, recommendations, and approvals pursuant to FAR 8.405-6(c).

1.0 Identification of the agency and the contracting activity, and specific identification of the document as a "Limited Source Justification."

This Limited-Source Justification was prepared by the Federal Communications Commission, Headquarters; Office of the Managing Director, Administrative Operations, Enterprise Acquisition Center located at 45 L Street N.E., Washington DC 20554 with the assistance of FCC's Wireline Competition Bureau (WCB), and the Consumer and Governmental Affairs Bureau (CGB).

2.0 Nature and/or description of the action being approved.

This is a new requirement that will be awarded to Porter Novelli Public Services, Inc. (PNPS) under its GS-23F-0231N on the Professional Services Schedule pursuant to MAS program procedures. This document justifies the placement of work under a new order for one (1) base year, with two (2) six-month option periods of services. This work is necessary to execute the nationwide Strategic Consumer Education Plan (Consumer Education Plan or Plan), which is currently under development by PNPS to increase public awareness of the Affordable Connectivity Program (ACP), and to inform eligible households of the steps they must take to enroll in the program.

- a. Project title.** Contract to Assist the FCC for *ACP Consumer Education and Outreach Support Services*.
- b. Name and address of the proposed contractor(s).**

Porter Novelli Public Services
1615 L St.,
Suite 1150,
Washington, D.C., 20036

3.0 A description of the supplies or services required to meet the agency's needs (including its estimated value):

Millions of low-income households experience difficulty paying for broadband service needed to participate in 21st Century society, including for work, education, healthcare, and civic engagement. Therefore, addressing affordability is a critical component of closing the digital divide. On November 15, 2021, the Infrastructure Investment and Jobs Act (Infrastructure Act or Act)¹ was enacted, providing

¹ Infrastructure Investment and Jobs Act, 2021 (Infrastructure Act), available at: <https://www.congress.gov/117/plaws/publ58/PLAW-117publ58.pdf>.

\$14.2 billion for the Affordable Connectivity Program (ACP), which is the successor program to the Emergency Broadband Benefit Program (EBB Program).

The Federal Communications Commission (FCC or Commission) requires a contractor capable of providing a variety of services that will assist and complement our ongoing work of educating eligible households to enroll in the ACP. The ACP is a multi-year program that supports eligible low-income and other qualifying households struggling to afford monthly internet service. This critical program 1) ensures that households have the connections they need for work, school, healthcare, and more; and 2) plays an integral role in helping to bridge the digital divide, which is an ongoing top priority for Congress and the Commission.

The ACP plays a critical role in addressing affordability barriers to broadband access and adoption by providing qualifying households with a monthly discount of up to \$30 a month (or up to \$75 for households residing on qualifying Tribal lands) for internet services, and a one-time \$100 discount on a connected device (tablet, laptop, or computer) with a co-pay of at least \$10 but no more than \$50.

The FCC is requiring PNPS to execute the Consumer Education Plan in order to conduct a public awareness campaign, and provide effective methods of public education for eligible households for the express purpose of promoting awareness and participation in the ACP. To date, it is estimated over 15.5 million eligible households participate in the ACP. However, the total eligible population is estimated to include 48 million households—or nearly 40% of households in the country—that qualify for the ACP either because their income is at or below 200% of the Federal Poverty Level, or because a member of the household meets one of the other criteria. Thus, a significant number of qualifying households have not yet enrolled in the ACP. Extensive outreach by a wide range of outreach partners is therefore needed to help maximize the potential impact of the ACP. Recognizing the importance of outreach to eligible households, Congress expressly authorized the Commission to conduct outreach to encourage households to enroll in the ACP, including facilitating consumer research, conducting focus groups, engaging in paid media campaigns, and providing grants to governmental and non-governmental outreach partners. In addition, Congress directed the Commission to coordinate with other federal agencies to ensure that households participating in eligible programs are aware of the ACP.

The execution of the Consumer Education Plan for the public awareness campaign is anticipated to include a variety of methods to assist in educating the public such as polling, targeted message development, paid and earned media, social media engagement, and design and distribution of print and digital materials. It should consider audience segmentation and provide a variety of methods to reach the different audiences. The initial audiences proposed for this rollout include: minority; low-income; rural; people with disabilities; seniors; non-English-speaking households; Native American Tribes; and large geographic markets. Based on their professional expertise, the FCC looks to the contractor to develop a strategic plan that refines the types of outreach and the target audiences as appropriate.

The contractor, PNPS, must provide recommendations on performance metrics and how to measure success. It is anticipated that the contractor will also supply weekly updates and coverage reports and be available for as-needed meetings and conference calls. It is also important for the contractor to be aware of communications activities and other public education efforts by the FCC and outside stakeholders.

Additionally, PNPS will develop a digital Hub (website) populated with multilanguage ACP outreach materials, a mechanism for ACP Grantees to post ACP enrollment events, a gallery where outreach partners can publish community-specific outreach resources, and a dashboard where ACP Grant Recipients are visualized by state along with current ACP enrollment numbers. Specifically, this campaign website will host an ACP enrollment tracker (by state), list ACP Grant Recipients (by state), host a knowledge library with contractor developed multilanguage ACP promotional materials with the

ability for FCC staff/ACP Grantees to upload community specific outreach materials, and feature an ACP event page (which allows ACP Grantees/FCC Staff to post ACP enrollment events and filter by state).

The FCC is seeking PNPS to execute this Consumer Education Plan and to assure that consumers have awareness of and information pertaining to enrolling in the ACP. Execution of the Plan needs to occur as soon as possible given that the ACP is already available nationwide. PNPS will conduct a public awareness campaign and provide effective methods of public education for eligible households for the express purpose of promoting awareness and participation in the ACP. Since a significant number of qualifying households have not yet enrolled in the ACP, it is imperative that the Commission's consumer education efforts commence immediately. Extensive outreach by a wide range of media partners is therefore needed to help maximize the potential impact of the ACP. Recognizing the importance of outreach to eligible households, Congress expressly authorized the Commission to conduct outreach to encourage households to enroll in the ACP, including facilitating consumer research, conducting focus groups, engaging in paid media campaigns, and providing grants to governmental and non-governmental outreach partners. In addition, Congress directed the Commission to coordinate with other federal agencies to ensure that households participating in eligible programs are aware of the ACP.

Execution of the Consumer Education Plan considers audience segmentation and provides a variety of methods to reach the different audiences, including, for instance, minority, low-income, rural, people with disabilities, seniors, non-English-speaking households, Native American Tribes, and consumers in large digital divide markets. The FCC requires a contractor, PNPS, with direct and recent experience and professional expertise to execute the Plan.

Please see the SOW for additional information.

- **Requirement type.**

- Research & development (R&D)
- R & D support services
- Support services (non-R&D)
- Supplies/equipment
- Information technology (IT)
- Construction
- Architect-engineer (A & E) services
- Design-build
- Other (specify): _____

- **Type of action**

- New requirement
- Follow-on
- Other (specify): _____

- **Proposed contract/order type.**

- Firm-fixed-price
- Other fixed-price (specify, e.g., fixed-price award-fee, fixed-price incentive-fee):
- Cost-plus-fixed-fee
- Other cost reimbursement (specify, e.g., cost-plus-award-fee, cost-plus-incentive-fee):
- Time and materials

- Indefinite delivery (specify whether indefinite quantity, definite quantity, or requirements): _____
- Other (specify): _____

Total estimated dollar value and performance/delivery period

The value of the PNPS contracted awarded to PNPS on 12/6/22 to develop the Consumer Education Plan was \$164,200. There are no organizational conflicts of interest in PNPS executing the recommendations in the Consumer Education Plan.

Estimated Value of Executing the Consumer Education Plan: Base + Options = The independent cost estimate (IGCE) projects an estimated 2-years maximum potential value of \$15.15 million.

- Base Period: 12 Months: Feb 1, 2023 – January 31, 2024;
Options: Plus Two (2) Six Month Option Periods
- Contract Value Breakdown:
 - Base Period total: \$8.43M
 - Option Period 1 Total: \$4.91M
 - Option Period 2 Total: \$1.81M
- Contract Total is: Two (2) years

4.0 The authority and supporting rational and, if applicable, a demonstration of the proposed contractor’s unique qualifications to provide the required supply or service:

The authority relied upon for limiting sources is FAR 8.405-6(a)(1)(i)(A) (“An urgent and compelling need exists, and following the procedures would result in unacceptable delays.”). The brief timelines created by the 2021 Infrastructure Act and delays in the procurement and implementation of the contract for creation of the Plan results in an urgent and compelling need to expeditiously execute the Consumer Education Plan. For the reasons explained below, conducting even a limited competition for a contract to execute the Consumer Education Plan is no longer feasible.

Background

Competition: Winter 2022

Congress passed the Infrastructure Act in November 2021, leaving the Commission little time to develop and implement the statutorily-mandated consumer outreach before the launch of ACP, the successor program to Emergency Broadband Benefit (EBB). The Commission decided to engage a public relations firm to create the Consumer Education Plan and conducted a competitive procurement for that contract in Winter 2022. In Winter 2022, the FCC released an RFP to selected vendors to develop a Consumer Education Plan. On November 16, 2022, EAC released RFP 273FCC23R0002 for ‘ACP Education and Outreach Support Services.’ Questions were due by November 23, 2022, by 12:00pm EST. Proposals were due by November 29, 2022 by 4:00pm EST. It was released to select vendors for two weeks. The FCC received one question from the vendor community. The FCC did not receive proposals from any vendors other than PNPS.

When no vendors responded to the RFP other than PNPS, the Commission proceeded with an award to

PNPS. Delays associated with that competitive procurement and the subsequent implementation of the PNPS contract to develop the Plan mean that there is simply no time left to conduct a competition for a contract to execute the Plan and at the same time assure, as Congress directed, that the Commission make consumer education resources available to ACP households impacted by the digital divide. Any further delay places consumers at risk of the deleterious impacts of the digital divide and will impair the FCC's ability to comply with statutory requirements.

Risks and Harm to Households, Consumers, Students, and Citizens

Absent immediate execution of the Consumer Education Plan envisioned by this contract, consumers could lose access to internet connectivity. Significant consumer education and outreach is critical to ensure the success of the ACP and the continued ability of consumers to have access to critical internet connectivity. The following social and economic risks may manifest if the sole source is not awarded:

1. Harm to Households; Harm to labor power through adverse social and economic outcomes; Harm to citizens

Prior to the COVID-19 outbreak, an estimated forty-two million Americans did not have the ability to purchase broadband internet. And as the pandemic ravaged the country, these vast inequities in technology access—which, together, have come to be known as the *digital divide*—have intensified and worsened. Roughly half of low-income families have struggled to pay their internet and cell phone bills. Millions of unemployed workers had trouble navigating state unemployment websites, while almost 15 percent of students face barriers in remote learning conditions because they lack access to high-speed internet at home. The digital divide creates disparity between different groups in society. This inequality does not allow some people to buy digital devices frequently. The workers who are most disproportionately impacted include those with less education and lower incomes; communities of color, such as Blacks and Latinos; older adults; rural residents (and most acutely in Native communities); the physically disabled; the LGBTQ community; and those falling in the intersections of these groups. The ACP consumer education and outreach campaign will help to engage eligible consumers and households and begin to close the digital divide as more of the U.S. population subscribes to affordable broadband service.

Additionally, without affordable broadband service, all citizens could be at risk for missing important and potentially life-saving news, weather, and emergency alert information. America's digital divide continues with large chunks of the country, especially rural and Tribal lands, still lagging behind in connection which significantly hampers their access to vital, potentially lifesaving information. Without adequate broadband service, urgent emergency alerts cannot get to phones, and it is more difficult for residents to warn one another of danger or contact authorities. About 25 million homes and small businesses nationwide are unserved or underserved by broadband service. However, that number is probably much higher since it's difficult to track exactly how many Americans have inadequate service. In an emergency, the access to and flow of information is paramount. Ample research has found that a "lack of available crisis information or poorly managed information flow" can lead to its own crisis. Because millions of households may have difficulty getting an emergency message due to the lack of affordable broadband, officials often rely on a patchwork of federal, public, private, and media systems and methods to disseminate information.

The first phase of the ACP started in early 2022. Sufficient outreach and education for the consumers is critical to ensure the success of the ACP writ large. Therefore, there is a very small window to proactively engage consumers in order to minimize the risk associated with the digital divide. If ACP consumer outreach and education is not executed immediately, the digital divide will continue causing increased deleterious economic and social harm to vulnerable households, citizens,

workers, and consumers. It has been determined by FCC leadership that this process must be started immediately and is declared “urgent and compelling.” Executing the timeline for a full and open competition will result in diminished participation in educating the consumer, meeting statutory deadlines, and possible overall failure of the project.

2. Harm to Education and students of all ages; Harm to mental health

The ACP was included in the 2021 Infrastructure Act to combat the digital divide. The digital divide includes a lack of access to digital technology and internet service. It can also include a lack of accessibility to modern, high-quality new technologies such as mobile phones and Wi-Fi access. If the digital divide persists amongst low-income, unserved, and underserved communities and households, the consequences could include isolation, which can affect mental health, educational barriers as postsecondary education increasingly moves online, and worsening gender discrimination.

Nearly 17 million school children lack internet access at home, creating a nationwide Homework Gap that left unsolved could become an opportunity gap. The ACP helps consumers and households close the Homework Gap by providing funding for the broadband they need for work, school, healthcare and more. The program provides a discount of up to \$30 per month toward internet service for eligible households and up to \$75 per month for households on qualifying Tribal lands. Eligible households can also receive a one-time discount of up to \$100 to purchase a laptop, desktop computer, or tablet from participating providers if they contribute more than \$10 and less than \$50 toward the purchase price.

If ACP consumer education and outreach is not conducted immediately, the digital divide will worsen as low-income households will not have access to affordable broadband since the digital divide stifles education. More and more schools require students to turn in their homework online or conduct research via the internet. This can present educational problems for underserved communities of a lower socioeconomic status, as they have a lower likelihood of access to information technology. The adverse effects of the digital divide on students includes the potential to affect children for the rest of their lives. Without quality remote education, they will not have the same access to quality jobs. The increasing gap in the digital divide has significantly undermined access and delivery of education.

5.0 A determination by the Contracting Officer that the order represents the best value consistent with FAR 8.404(d).

Per FAR 8.404(d), GSA has already determined the prices of supplies and fixed-price services, and rates for services offered to be fair and reasonable under its Schedule contracts. The Contracting Officer (CO) uses PNPS’s schedule for price comparison, as well as other market information, such as catalogs, to assure pricing is competitive. The CO sought discounts from the vendor’s GSA schedule contract rates and prices to ensure that the Government receives the best value. An independent government estimate (IGCE) was prepared and compares favorably to the contractor’s proposed pricing. As more fully described below, PNPS is well qualified and best suited in these circumstances to conduct the implementation of the Plan based on its prior directly relevant experience in reaching the types of localized populations at risk, its substantial expertise in the outreach channels and materials needed in this effort, and the fact that it is developing the Plan on behalf of the Commission and will therefore be intimately familiar with the steps needed to execute that Plan and be able to commence that effort immediately.

Per FAR 8.404(d), GSA has already determined the prices of supplies and fixed-price services, and rates for services offered at hourly rates, under schedule contracts to be fair and reasonable. The CO will use

the PNPS GSA rate schedule as a price comparison point, and where available, will use other market information, such as catalogs, to assure pricing is competitive. In addition, public relations will be compared to the GSA schedule contract rates and prices of other vendors. The CO will seek discounts from the vendor's GSA schedule contract rates and prices to ensure that the Government receives the best value.

An independent government estimate (IGCE) has been prepared and will be compared to the contractor's proposal during the finalization process , in accordance with FAR 15.805-2(e).

6.0 A description of the market research (FAR Part 10) conducted among GSA schedule contract holders and the results or a statement of the reason market research was not conducted.

The FCC conducted market research in preparation for the Consumer Education Plan procurement. Commission staff expert in public relations and media outreach reviewed GSA schedule rates for qualified public relations firms, reviewed commercial benchmarks for media buy and associated costs, and used their industry knowledge and experience. While it would be possible, with sufficient additional time to compete the requirement to execute the Plan, given the time constraints imposed by the statute and subsequent procurement difficulties in related procurements, for the reasons presented below, PNPS is most suited (and perhaps uniquely suited) to satisfy the requirement under these time pressures and considering the limited lead and learning curve times available.

PNPS recently conducted a federal government education campaign which is materially similar to the FCC's needs. PNPS recently conducted a seven-wave nationwide integrated campaign to educate senior citizens about the new Medicare card for the Centers for Medicare and Medicaid Studies (CMS). The same community that is a high priority focus of the Consumer Education Plan. Through this campaign PNPS developed proprietary strategies and expertise for educating hard-to-reach citizens on a phased, highly localized basis. PNPS developed materials, benchmark data, and federal media liaisons which are directly reusable for the FCC's needs. PNPS also developed a database of highly localized distribution channels and known current media contacts that will eliminate the time that would otherwise be needed to create such resources. PNPS is therefore a proven source of access to this critical community. PNPS is also currently developing the Consumer Education Plan for the Commission, and it is therefore prepared to immediately commence implementation of that plan. As part of the development of the Plan, PNPS has piloted outreach campaigns. As a result, PNPS will be able to pivot immediately to implementation and to execute the consumer education initiatives set forth in the Plan. Rapid implementation of these strategies is necessary to comply with the consumer education requirements in the 2021 Infrastructure Act.

PNPS's corporate capabilities and past performance identified PNPS's extensive experience working with federal agency partners to implement localized consumer education solutions on national public policy matters, including campaigns for the Federal Deposit Insurance Commission, Internal Revenue Service, and Department of Health and Human Services. PNPS is currently completing a successful national campaign to promote the new Medicare card for CMS. More broadly, PNPS has comprehensive knowledge of paid and earned media trends, leveraging online resources, and experience targeting hard-to-reach audiences.

PNPS has a proven record of conducting successful education campaigns on behalf of the federal government around complex issues, including the Medicare card project for CMS that is directly analogous to the Commission's Consumer Education Plan and outreach program. PNPS has demonstrated an understanding of how to take a national issue like ACP and tailor it to local markets. PNPS also has recent, highly-relevant experience targeting hard-to-reach audiences with a message about how the actions of a federal agency will impact them and explaining the steps that consumers must take. Its work on the campaign Medicare card, and the experience of relevant personnel who are now available

to work on this procurement, demonstrate the skills needed to effectively implement the Consumer Education Plan.

This renders PNPS uniquely positioned to perform these services.

While other contractors can provide similar services to the Commission, it would be inefficient to conduct another competitive procurement at this point due to the tight statutory deadlines in the 2021 Infrastructure Act.

Since the original competition in November 2022 did not yield any proposals other than from PNPS, another competitive procurement at this point is highly unlikely to result in significant savings that couldn't be realized through negotiations during a sole source award.

Public Relations support services are abundant with transparent and scaled pricing available on GSA schedules. Thus, a full and open competition will not offer the government any additional cost savings or service innovation. In this instance, a sole source approach reduces risk and expense. By limiting the source of award, the Government ensures efficiency and minimizes the risk of a potential loss of time and resources in conducting a full and open competition.

Further, the FCC has analyzed the GSA rate tables submitted by PNPS as well as the firm's capabilities. PNPS has demonstrated the necessary capabilities to perform the requirements and the firm's rates are competitive and reasonable. An independent government estimate (IGCE) was prepared and compares favorably to the contractor's proposed pricing.

Due to a limited vendor community, and the urgent and compelling nature of the 2021 Infrastructure Act, the FCC must proceed with a sole source. The proposed contractor, PNPS, has a proven record of timely and satisfactory performance with other Federal Agencies (HHS, NIH) for previous similar work. As previously stated, the FCC conducted a competition for the 'Plan' contract but did not receive any proposals other than PNPS. PNPS can provide these services to meet FCC's requirements based on urgent and compelling need.

7.0 Any other facts supporting the limited sources justification and/or any other facts supporting the use of other than full and open competition.

The time restraints of the ACP do not allow for complete and comprehensive specifications, plans, and statements of work, which may frustrate vendors. PNPS has demonstrated exceptional adaptability, expertise, longevity, past performance and capability to perform this public-facing requirement expeditiously and tactfully.

8.0 A statement of the actions, if any, the agency will take to remove or overcome any barriers that led to restricted consideration before any subsequent acquisition for supplies and services is made.

While this is a time-critical acquisition resulting from specific statutory requirements of the 2021 Infrastructure Act, the requirement is non-recurring. Given the time left for onboarding, short time to complete execution, program priorities and limited technical staffing available for evaluation panels, and potential transition costs and disruptions, it is unlikely that sufficient procurement administrative lead time exists to compete the procurement. In addition, in the current environment, complete and comprehensive specifications, plans, and statements of work are only now emerging. The Consumer Education Plan will propose a comprehensive nationwide approach designed to increase awareness of the ACP on a localized, rolling basis as

the phases progress. The Commission anticipates that Plan will include recommendations that the vendor selected to execute the Plan produce several types of creative content such as audio and video segments, print and digital advertisements, and promotional fliers and mailers. These materials will be customized and utilized repeatedly across markets nationwide as the phases progress. It is therefore likely that the Commission will need a single vendor to execute the Consumer Education Plan and manage the consumer education process throughout the ACP implementation or face acute strategic and implementation challenges (as well as, potentially, face business proprietary information transfer challenges) in selecting a vendor for the immediate phases and then conducting a full competitive procurement for the later phases. Nevertheless, the contract is structured with two short options to preserve the Government's ability to compete the single outyear should program conditions, experience with the instant contract, and the competitive environment make that the best course for the Government.

9.0 Any other facts supporting the sole sources justification and/or any other facts supporting the use of other than full and open competition.

- a. The time restraints of the ACP do not allow complete and comprehensive specifications, plans, statements of work, etc. The definitization process will include the defining of specific requirements.
- b. PNPS has demonstrated exceptional expertise, longevity, past performance and capability to perform this requirement expeditiously to meet this high profile national need for the FCC.
- c. The extent and nature of the harm the Government would incur have already been described previously but are re-iterated below:

Millions of low-income households experience difficulty paying for broadband service needed to participate in 21st Century society, including for work, education, healthcare, and civic engagement. Therefore, addressing affordability is a critical component of closing the digital divide. On November 15, 2021, the Infrastructure Act was enacted, providing \$14.2 billion for the ACP, which is the successor program to the EBB Program. Difficulty in accessing the internet increases inequality among different groups, as it prevents part of the population from accessing the possibilities they offer. For example, during the lockdown, where many schoolchildren were forced to continue their classes online, the lack of a stable connection and the appropriate devices meant some students were unable to keep up their schooling as normal. The same happened with working from home: adults who lacked the right tools and know-how were limited in their ability to work as normal. Different consequences caused by the digital divide are:

Isolation: social isolation, especially as a result of the pandemic, has increased among people who do not have access to the internet. Additionally, people living in rural areas without reception are virtually cut off from communication services.

Difficulty in accessing education: the lack of access to the internet makes it difficult for both children and adults to access education.

A barrier to accessing work: people face greater difficulties in finding a job, not only because digital know-how is increasingly necessary but also because they are unable to check online job websites where these offers are published.

Social differences: the obstacles to connecting to the digital world make the differences between groups more evident.

Geographical differences: these are also intensified between regions and countries, which directly affects their possibilities for growth.

Dependence and vulnerability: technological discrimination means that some people have less independence in performing certain tasks, which in turn makes them more vulnerable (e.g., digital crime).

10.0 A statement of the actions, if any, the agency will take to remove or overcome any barriers that led to restricted consideration before any subsequent acquisition for supplies and services is made.

The urgency of accomplishing this work to prevent damage and harm to the government is the driving force of this acquisition. Because this is a time-critical acquisition resulting from the 2021 Infrastructure Act statutory specific requirements, no efforts could be planned to remove or overcome any barriers to competition before the acquisition. This circumstance is to be considered non-recurring.

11.0 Requiring Office Certification:

I certify that the supporting data, which form the basis of this Limited-Sources Justification, are complete and accurate to the best of my knowledge and belief.

Adriana Zimmer

Date Jan 24, 2023

Adriana Zimmer
Contracting Officer's Representative, Level III

CO Concurrence and Approval: I have reviewed this Limited-Sources Justification and find it to be accurate and complete to the best of my knowledge and belief. My approval is based upon the circumstances described herein.

James J. Batten

Date Jan 24, 2023

James Batten
Contracting Officer
EAC/OMD

Senior Procurement Executive (SPE) Approval: I have reviewed this Limited-Sources Justification and find it to be accurate and complete based upon the circumstances described herein.

Sunny Diemert Digitally signed by Sunny Diemert
Date: 2023.01.24 16:16:59 -05'00'

Date _____

Sunny Diemert
Senior Procurement Executive
EAC/OMD

Competition Advocate Approval: I have reviewed this Limited Sources Justification and I concur.

Mindy Ginsburg

Date 1/25/2023

Mindy Ginsburg
Competition Advocate
OMD