



Limited Sources Justification

1. Agency and Contracting Activity:

Agency: Headquarters Air Combat Command (HQ ACC),



Contracting Activity: General Services Administration (GSA) Region 5



2. Description of Action. A Limited Sources Justification is being requested to establish a single award Blanket Purchase Agreement (BPA) to provide CompTIA Exam Vouchers and Continuing Education (CE) Tokens to HQ ACC/A6F.

3. Description of Supplies or Services. Department of Defense (DoD) Directive 8570.01 provides the basis for an enterprise-wide solution to train, certify, and manage the DoD Cyberspace/Information Assurance workforce. The policy requires Cyberspace (formerly known as Information Assurance) technicians and managers to be trained and certified to a DoD baseline requirement. The Defense Information Systems Agency Information Assurance Support Environment (DISA IASE) website¹ identifies the specific CompTIA certifications required by the Directive's enterprise-wide certification program. The client agency is required to comply with the DoD Directive 8570.01-Manual² to ensure all personnel assigned to Cyberspace/Information Assurance positions achieve and maintain CompTIA certifications commensurate with the level of duties associated with their specific position.

The BPA will allow HQ ACC/A6F to purchase firm fixed price CompTIA Exam Vouchers and CE Tokens. The CompTIA Exam Voucher is a unique code that will enable the user to take the exam at an authorized testing center. The CE Tokens can be used by employees to pay their annual CE fees. The CE tokens do not expire and are non-refundable. The product delivered by the vendor shall be a unique alpha-numeric identifier associated with each Exam Voucher/CE Token which will be transmitted to the Government electronically.

¹ <http://public.cyber.mil/wid/cwmp/dod-approved-8570-baseline-certifications/>

² Appendix 3.2 states that the approved IA baseline certifications table is on the DISA IASE website.



The BPA performance period will be a 12-month base period (August 1, 2023 – July 31, 2024) and a six-month option period (August 1, 2024 – January 31, 2025). All delivery orders under the BPA will be firm fixed price. The BPA estimated value is \$4,526,598.84.

4. Authority Cited. FAR 8.405-6 (b), items peculiar to one manufacturer. CompTIA is the sole manufacturer of the memberships, site licenses, pre-assessments, test vouchers, and all other materials related to the required certifications and their associations. The client agency must use the CompTIA certifications which are listed on the DISA IASE website. The client agency requires specific exam vouchers and annual maintenance fee tokens that are only provided by CompTIA (other than small business) and its authorized resellers.

CompTIA's 8570 approved certifications are listed on the DISA IASE website and shown in the table below:

Certification Exam Vouchers and CE Tokens
CompTIA Cloud+
CompTIA A+
CompTIA CASP+
CompTIA CySA+
CompTIA Network+
CompTIA Security+
CompTIA PenTest+

5. Efforts to Obtain Competition. CompTIA's Business Director confirmed in an email (dated April 18, 2023) that the only authorized resellers are Learning Tree International and Technical Communities. Both companies have a letter of supply from CompTIA and GSA Schedules. The former CompTIA resellers were New Horizon and Global Knowledge, and both companies are now manufacturers, as shown in GSA eLibrary

6. Actions to Increase Competition. The CompTIA's Business Director confirmed in an email (dated April 18, 2023) that it's the company's practice to keep the number of partners limited to the current two companies; Learning Tree International (other than small business) and Technical Communities (small business).

7. Market Survey. On February 23, 2023, a Request for Information (RFI) was posted on GSA eBuy to all Multiple Award Schedule vendors under NAICS Code 611420 Computer Training. The RFI closed on March 10, 2023. Three companies responded to the RFI (ATG Learning, RV Global Solutions and Technical Communities). The CompTIA's Senior Director of Business



Development confirmed in an email (dated March 20, 2023) that ATG Learning and RV Global are not authorized resellers and Technical Communities, Inc. is an authorized reseller and has a letter of supply from CompTIA. On April 18, 2023, a second RFI was emailed to Learning Tree International with a closing date of April 26, 2023. The contracts representative with Learning Tree (Marthe Lewis) acknowledged receipt of the RFI email on April 18, 2023. However, Learning Tree did not submit a RFI response by April 26, 2023. The BPA RFQ will be solicited to the two CompTIA authorized resellers. The client agency will evaluate and award a single award BPA.

8. Other Factors.

- a. Procurement History. A single award BPA (47QFLA18F0193) was awarded to Technical Communities on Schedule GS-35F-0311R in 2018 and included a base year and four option years. The BPA is in option year four and the performance period ends July 31, 2023. The BPA estimated value is \$12M. A total of twenty-one delivery orders have been awarded with a total funded amount of \$10.9M.

The BPA was procured full and open on Schedule 70. Only one quote was received and evaluated. A sources sought notice was posted on GSA eBuy on December 5, 2017, and closed on December 19, 2017. Four companies responded to the sources sought notice (ATG Learning, Knowlogy, Technical Communities and Unatek). On December 28, 2017, a letter from CompTIA was received that identified the list of authorized resellers with a letter of supply from CompTIA. Technical Communities was on CompTIA's list as an authorized reseller. The other vendors that responded to the sources sought were not authorized resellers. CompTIA's letter identified the following four companies as authorized resellers with a letter of supply: New Horizons, Global Knowledge, Learning Tree and Technical Communities.

- b. Acquisition Data Availability. This is not applicable for this requirement. The CompTIA certifications are identified on the DISA IASE website. The Exam Vouchers and CE Tokens are only provided by CompTIA and its authorized resellers.
- c. Fair and Reasonable Determination. To determine fair and reasonable BPA pricing on the CompTIA Exam Vouchers/CE Tokens, the Contracting Officer will consider competition with the resellers, the Schedule pricing, and the Government estimate. The GSA Schedule rates are considered fair and reasonable, and the CO may seek additional discounts on the pricing.



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9. Technical/Requirement 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.

Digitally signed by
[Redacted] A.112843270
Date: 2023.05.18 15:28:21 -04'00'

Date: 18 May 23

USAF HQ ACC/A6F

10. Project Manager Certification. I certify that this justification is accurate and complete to the best of my knowledge and belief.

DocuSigned by:

Crista Decker

5/18/2023

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Date: _____

Crista Decker

Project Manager, 5Q1FAD

11. Contracting Officer Certification. I certify that this justification is accurate and complete to the best of my knowledge and belief.

DocuSigned by:

Asija Pittman

5/15/2023

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Date: _____

Asija Pittman

Contracting Officer, 5Q1ZAB

12. Legal Sufficiency Review: I have reviewed the foregoing justification and approved and deem it legally sufficient.

DocuSigned by:

Scott McCleary

5/10/2023

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Date: _____

Scott McCleary

Assistant Regional Counsel, 5L



Federal Acquisition Service
Great Lakes Region

13. Concurrence:

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Yjuania Still
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5/10/2023

Date: _____

Yjuania Still
Supervisory Contracting Officer, 5Q1ZAB

DocuSigned by:
Martin Hamlin
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5/15/2023

Date: _____

Martin Hamlin
Director, R5 Assisted Acquisition Services, 5Q1FA

14. Contracting Director/Competition Advocate Approval. Based on the foregoing Limited Sources Justification, I hereby approve the procurement pursuant to the authority of FAR 8.405-6(b), items peculiar to one manufacturer. The client agency requires specific exam vouchers and annual maintenance fee tokens that are only provided by CompTIA and its authorized resellers.

DocuSigned by:
Micky Mayes
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5/15/2023

Date: _____

Micky Mayes
Competition Advocate
Director, Contracting Division, 5Q1ZA