

## JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION

### SIMPLIFIED ACQUISITION PROCEDURES (SAP) FAR 13.106-1(b)

SOLICITATIONS MAY BE LIMITED TO ONE SOURCE ONLY IF THE CONTRACTING OFFICER DETERMINES THAT ONLY ONE SOURCE IS REASONABLY AVAILABLE. THIS DETERMINATION MUST BE SUPPORTED WITH FULL JUSTIFICATION FOR SOLE SOURCE FROM THE CUSTOMER. WHEN THE CUSTOMER DESCRIBES AN ITEM WITH A PURCHASE DESCRIPTION WHICH LIMITS THE AVAILABILITY TO ONE SOURCE, THE JUSTIFICATION MUST EXPLAIN WHY THE ITEM IS THE ONLY ONE THAT WILL MEET THE GOVERNMENT'S REQUIREMENT. STATEMENTS SUCH AS "ONLY KNOWN SOURCE" OR "ONLY SOURCE WHICH CAN MEET THE REQUIRED DELIVERY DATE" ARE INADEQUATE TO SUPPORT A SOLE SOURCE PURCHASE.

PURCHASE REQUEST OR REQUISITION NUMBER  
3101-CD03

PROJECT/TASK  
NUMBER  
HC-144

IDENTIFICATION OF THE AGENCY AND THE CONTRACTING OFFICE, AND SPECIFIC IDENTIFICATION OF THE DOCUMENT AS A "JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION." PLEASE CITE THE AUTHORITY AND TYPE OF JUSTIFICATION. The United States Coast Guard (USCG), Aviation Logistics Center (ALC), Medium Range Surveillance (MRS) Product Line, intends to award a firm-fixed price overhaul order on a sole source basis. The statutory authority permitting other than full and open competition is 41 U.S.C. 1901(c), as implemented in FAR 13.106-1(b) (1).

BRIEF DESCRIPTION OF SUPPLIES OR SERVICES REQUIRED, AND THE INTENDED USE. MRS intends to overhaul the following part(s) on a sole source basis: Starter Generator: P/N: 8160-530MOD, NSN: 2925-14-442-5418, Qty:2 ea. with a possibility of an additional Qty of 0ea and Starter Generator: P/N: G4085-1000, NSN: 2925-01-HS3-3357, Qty:4 ea. with a possibility of an additional Qty of 10ea. These items are replaced during Product Depot Maintenance (PDM) because of corrosion and/or damages. These assets will be upgraded by the OEM changing the length of the brushes, which can only be accomplished by the OEM.

UNIQUE CHARACTERISTICS THAT LIMIT AVAILABILITY TO ONLY ONE SOURCE, WITH THE REASON NO OTHER SUPPLIES OR SERVICES CAN BE USED. These items to be overhauled under this acquisition (to include its Form, Fit, and Function) are unique to a specific aircraft, and any installation, operation, or servicing must comply with the Aircraft Original Equipment (OEM), requirements and/or the USCG's authorized engineering authority for this airframe. As the Original Equipment Manufacturer (OEM) of these items, Thales Avionics Inc. (Cage Code: 3J0E6) owns all rights to the technical data, specifications, and drawings required to overhaul these items. The rights to the technical data necessary in order to overhaul these items from other than the OEM or an OEM approved source are not owned by the Government, and it has been determined that it is uneconomical to purchase these rights.

A DESCRIPTION OF EFFORTS MADE TO ENSURE THAT QUOTATIONS OR OFFERS ARE SOLICITED FROM AS MANY POTENTIAL SOURCES AS PRACTICABLE (INCLUDE YOUR MARKET RESEARCH EFFORTS HERE). USCG uses past procurement history and the international aviation subscription service (Inventory Locator Service or ILS®), to seek available sources of supply. All potential sources were contacted via market research to determine if they possessed the following criteria: (1) if not the OEM, are in legal possession of the necessary service data, (2) have true capability, and (3) can meet the required Turn-Around-Time.

REASON THAT SUGGESTED SOURCE IS THE ONLY SOURCE WHICH CAN PROVIDE THE SUPPLIES OR SERVICES. Thales Avionics Inc is the OEM, and they own the rights to the technical data, specifications and drawings required to overhaul these items. These parts can only be overhauled by the OEM, or an authorized overhaul facility approved by the OEM.

EXPLAIN WHY AN ADEQUATE PURCHASE DESCRIPTION OR OTHER INFORMATION SUITABLE TO SOLICIT BY FULL AND OPEN COMPETITION HAS NOT BEEN DEVELOPED OR ARE NOT AVAILABLE. Due to Operational Safety and/or Flight Critical Requirements, the USCG cannot legally change the requirement for this item as it is directed by the OEM and/or the OEM's manager of such data. Therefore, procurement processes are dictated by the OEM or an approved source of the OEM. The Government does not own or possess any rights to the technical data, specifications, and drawings required to manufacture these parts. In addition, the Government has not developed the technical data required to manufacture these parts and has no plans to do so.

PROVIDE A STATEMENT OF ACTIONS, IF ANY, THE GOVERNMENT MAY TAKE TO REMOVE OR OVERCOME ANY BARRIERS TO COMPETITION BEFORE FUTURE ACQUISITIONS ARE REQUIRED. It is not economically feasible for the Government to purchase the OEM rights, technical data, etc. to manufacture these parts. However, the USCG ALC MRS still continues to check maintenance and overhaul web-based subscription services, alternate approved systems, and industry periodicals, and send representatives to various aviation trade shows and conferences to seek out all possible legally achieved purchase/service options and sources.

**USCG ALC MRS SIMPLIFIED ACQUISITION PROCEDURES BET.SAM POSTING (\$25K to \$250K)**

**ONE PAGE SOLE OR LIMITED SOURCE JUSTIFICATION**