NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GEORGE C. MARSHALL SPACE FLIGHT CENTER
LIMITED-SOURCES JUSTIFICATION (LSJ)

I recommend that NASA, George C. Marshall Space Flight Center negotiate with Lee and Associates, LLC only for Subject Matter Specialist (SMS) Support for the Space Launch System (SLS) Office. The total Time and Materials ceiling amount of this effort is $1,019,700 and the estimated period of performance is August 1, 2013 to December 31, 2013.

This is a continuation of effort provided by Lee since 2008. The General Services Administration (GSA), Federal Supply Schedule (FSS) GS-23F-0275R task order will be awarded with a start date of August 1, 2013 as a follow-on to previously awarded task orders under the Specialized Engineering Project Support (SEPS) Blanket Purchase Agreements (BPAs), to enable completion of the Marshall Integrated Program Support Services (MIPSS) BPA competition. MSFC management made the decision to transition this effort into MIPSS. The MIPSS BPAs have not yet been awarded due to corrective action taken as a result of a GAO protest. Therefore, the transition of this effort has not been completed. This LSJ provides for award of a new task order to enable completion of the MIPSS BPA and subsequent task order competition.

This acquisition will be conducted under the Authority of the Multiple Award Schedule (MAS) Program in accordance with Title III of the Federal Property and Administrative Services Act of 1949 (41 U.S.C. 251, et seq.) and Title 40 U.S.C. 501, Services for Executive Agencies. Accordingly, it is proposed that an order for the required supplies or services be placed against the contractor's GSA FSS Contract GS-23F-0275R.

This recommendation is made pursuant to FAR 8.405-6(a)(1)(i)(C) which authorizes limiting the number of sources from which the government may place orders for supplies or services from GSA FSS contracts when an LSJ has been approved demonstrating that, in the interest of economy and efficiency, the new work is a logical follow-on to an original FSS order provided that the original order was placed in accordance with the applicable FSS ordering procedures. The original order must not have been previously issued under sole-source or limited-sources procedures. Pursuant to FAR 8.405-6(a)(2), the approved LSJ will be posted and a notice of award will be published.

This action will allow for continuity and stability of these services through the early phases of SLS. It is important that MSFC have access to critical skills and capabilities during this period in order to successfully accomplish MSFC goals and Agency direction. This procurement is for facilitating key trade studies and decision analyses using advanced techniques. The design decisions involve all elements of the SLS program as we seek to find balanced solutions to multidisciplinary problems.

The circumstances limiting consideration to one GSA FSS source are as follows:

1. It is not practical to compete this work and then transition to MIPSS for such a short period of time. The potential benefits of competition would not offset the administrative burden and expense of conducting two competitions simultaneously or the potential disruption of services from conducting multiple and possibly parallel contracts transiting for the same work in less than a six-month period.

2. Lee's experience base includes: subject matter specialists in the areas of program management, systems engineering and integration, solids, liquid stages, engines and spacecraft/payload integration. Each subject matter expert has many years of experience directly related to the Space Launch System (SLS) program goals and initiatives. Failure to continue this effort will result in a disruption of support and loss of knowledge essential to the mission of MSFC.

3. It is estimated that the cost to bring another contractor up to par with Lee and Associates for this brief period is $404,316. That figure is approximately 2 months of current billings by Lee and Associates (the period it is estimated for another contractor to attain the competency of Lee and Associates for the effort described).

Pursuant to 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. Therefore, ordering activities are not required to make a separate determination of fair and reasonable pricing, except for a price evaluation as required by 8.405-2(d), which states, the ordering activity is responsible for considering the level of effort and the mix of labor proposed to perform a specific task being ordered, and for determining that the total price is reasonable."

Market research among the GSA FSS holders was not conducted since this effort represents continuation of effort that must be completed with the same expertise and without interruption to support the mission.

Due to the specialized nature of this requirement, there are no known actions which the agency may take to remove or overcome barriers to competition before any subsequent acquisition for the services required.

For the above reasons, competition among FSS sources is not feasible at this time. Therefore, procurement of these services from Lee and Associates is the only practical approach.

I hereby certify the facts in this justification and any supporting data which form the basis for this justification are complete and accurate.

Keith Heffner
Project Manager

5/16/13
Date

I hereby certify that this justification is accurate and complete to the best of my knowledge and belief. In addition, I hereby determine that the anticipated total price of the order will be reasonable and that the resulting task order represents the best value to the Government consistent with FAR 8.404(d).

G. Earl Pendley
Manager, Space Transportation Support Office

5/17/13
Date

Concurrence:

Kim E. Whitson
Procurement Officer

5/21/13
Date

Approval:

L. Dale Thomas
MSFC Competition Advocate

May 22, '13
Date