NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GEORGE C. MARSHALL SPACE FLIGHT CENTER

JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION (JOFOC)
PURSUANT TO TITLE *10 U.S.C. 2304 (C) (1)*

1. This document is a Justification for Other Than Full and Open Competition (JOFOC) prepared by the NASA Marshall Space Flight Center (MSFC) in accordance with Federal Acquisition Regulation (FAR) Part 6.3, Other Than Full and Open Competition, and NASA FAR Supplement (NFS) Part 1806.3, Other Than Full and Open Competition.

2. **Nature and/or description of the action being approved:**

This justification provides the rationale for contracting by other than full and open competition for continuation of engineering technicians and trade skills services from InfoPro Corporation (IPC) under the Marshall Engineering Technicians and Trades Support Services (METTS) contract, NNM08AA20C. It is recommended this action be accomplished through a 3-month extension to the METTS contract.

METTS is a cost-plus-award-fee (CPAF), mission services and IDIQ instrument with the IDIQ work authorized through individual task orders. The METTS contract was competitively awarded to IPC on February 12, 2008 with a 1-year base and four 1-year options. Performance began on March 1, 2008 and will currently end March 31, 2015. Previous modifications have been awarded to extend the period of performance an additional 6 months from March 1, 2013 to August 31, 2013, an additional 12 months from September 1, 2013 to August 31, 2014, and an additional 7 months from September 1, 2014 to March 31, 2015. A re-competition for the follow-on requirement is currently in process. The re-competition is nearing the final stages however it will not be completed by the March 31, 2015 expiration of the current METTS contract. Approval of this action will allow for continuation and stability of these services through the completion of the re-competition process for the METTS follow-on requirement.

3. **Description of the supplies or services required to meet the agency's need, including estimated value:**

The METTS contract includes mission services, which provides a wide range of engineering technicians and trade skills to perform testing, ground and space based research, test operations, data analysis, machine and electrical shop operations, other technical activities and management oversight for aerospace environments core capability, and the IDIQ portion, which provides for procuring additional work force to support multiple programs/projects as workload demands.

NASA/MSFC has design responsibility for the Space Launch System (SLS) and receives considerable engineering technician and trades support from IPC under the METTS contract. Currently, there are approximately seven (7) major tests currently in build-up in support of the SLS Program. Examples include Integrated Stage and Propulsion Element (ISPE) Qualification Test I, SLS Liquid Oxygen (LOX) Tank Test, SLS Liquid Hydrogen (LH2) Tank Test, In-Space Propulsion Workhorse (ISPW) Fuel Turbo-pump Testing, SLS Vehicle Integrated Pressurization and Power, SLS Gaseous Oxygen (GOX) Vehicle Integrated Pressurization and Power System (VIPPS), and SLS Intertank Test. In addition, some major manufacturing activities are ongoing using the 7-axis machining center in the fabrication of the Shell Buckling Seamless Barrels.

The METTS contract is also used to provide the engineering and technical services for Propellant and Pressurant (P&P) Services to sustain all MSFC operations and testing. This support includes the recent mandate by Agency Headquarters for a new requirement to perform a biannual inspection of 170 multilayer vessels at MSFC. The first inspection is in process and the second inspection will take place during the extension period.

Major SLS activities are in their beginning stages of planning, layout, and fabrication in the mechanical fabrication shop. Ground Support Equipment (GSE) include Multi-Purpose Carrier (MPC) and Hardware

Interface Structure (HIS). These major components will be the infrastructure that transport the new launch rocket (Core Stage) being developed by Boeing.

In addition to SLS activities, there has been an increase of critical Environmental Control and Life of Support System (ECLSS) fabrication, refurbishment, and assembly hardware in support the International Space Station (ISS). This work was previously unplanned for FY15 and is of the utmost importance to keep continuity of work competency.

This action will allow NASA/MSFC to continue receiving highly specialized engineering technician and trades services to support NASA's missions without disruption and at the appropriate levels, through the re-competition of the METTS contract. The estimated increase needed to the contract value to support the continuation of services through the completion of the re-competition is $12.5 million.

4. Statutory authority permitting other than full and open competition:

This recommendation for approval is made pursuant to Federal Acquisition Regulation (FAR) 6.302-1, which implements the authority for U.S.C. 2304(c)(1), for the acquisition of supplies and services from only one responsible source and no other type of supplies or services will satisfy agency requirements. In accordance with FAR 6.302-1(a)(2)(iii), services may be deemed to be available only from the original source for the continued provision of highly specialized services when it is likely that award to any other source would result in unacceptable delays in fulfilling the agency's requirements. FAR 6.302-1(b)(1)(ii) provides that use of this authority may be appropriate in a situation when unique services are available from only one or a limited number of sources.

5. A demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires the authority cited:

As the current METTS contractor, IPC is uniquely positioned to continue providing the required services until completion of the re-competition for the follow-on contract. As such, IPC is uniquely positioned to provide the required engineering technician and related services in support of SLS during this time of design, fabrication and testing. Since award of the existing contract in March 2008, IPC has been supporting MSFC's requirements with an average of about 250 work-year equivalents (WYEs) over the six years. With assignment of SLS, MSFC's requirement for engineering technicians and trades has increased significantly to over 300 WYEs. From contract award through the present, there has been an approximate 220 percent growth rate in the level of WYE support provided by IPC.

IPC has been the only METTS support services contractor for MSFC. Therefore, IPC has been the support contractor providing engineering technician and related skills to MSFC since initiation of the SLS Program. As a result, IPC has developed within their management staff a unique knowledge and understanding of requirements, operations, fabrication, testing, and processes across the diverse technical discipline elements of MSFC's Engineering Directorate (ED). Use of IPC's existing and proven capabilities will permit the timely execution of significant tasks that are necessary for achieving SLS milestones.

It is certainly in the public interest to ensure that sufficient skilled resources are available to support critical SLS milestones. Approval of this action will guarantee stability in the contractor support of engineering technician and trades workforce at MSFC.

6. Description of the efforts made to ensure that offers are solicited from as many potential sources as practicable:

Pursuant to NASA FAR Supplement 1804.570, this proposed action will be published on the NASA Acquisition Internet Service (NAIS) and, pursuant to FAR 5.201, this proposed contract action will be synopsized in the Federal Business Opportunities (FBO). Any responses received as a result of the publishing on NAIS and FBO will be appropriately dispositioned and documented in an addendum to this document.

7. **A determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable:**

The METTS Contract is a competitively awarded CPAF, mission services and IDIQ instrument with the IDIQ work authorized by individual task orders, which are priced using the labor categories and fully burdened direct labor rates established in the contract. These established rates are on an annual basis and cover the intended contract performance period of seven years. Upon approval of this justification, a Request for Proposal will be issued to IPC to obtain proposed labor rates for the 3 month extension period. The proposal will be evaluated and negotiated to obtain fair and reasonable labor rates. The proposed rates will be compared to available historical data from the current METTS contract. In addition, the Defense Contract Audit Agency audit information and certified cost or pricing data submitted by IPC will be utilized.

Fair and reasonable cost to the Government is also determined at the time a task order is issued. When pricing task order requests from the Government, the contractor is required to price resources in accordance with the contractor's actual average rates at the time of the task order proposal. Each task order proposal is then evaluated by the Government and negotiated with the contractor prior to issuance of the individual task orders. A determination by the Contracting Officer that the anticipated cost of that individual task is fair and reasonable is required in order for the Government to award a task order.

8. **Description of the market survey conducted, and the results, or a statement of the reasons a market survey was not conducted:**

An informal review of the market revealed that there is no other source capable of immediately providing the unique mission and engineering skills and expertise required by MSFC. Based on this knowledge of the market place, additional market survey activities will not be pursued since no other potential sources exist to provide the required mission and support services.

9. **Other facts supporting the use of other than full and open competition:**

There are no other facts supporting the use of other than full and open competition than previously stated.

10. **Sources, if any, that expressed an interest in writing in the acquisition:**

There have been no written expressions of interest in this contract extension action to date. However, if any are received as a result of the NAIS publication or the Federal Business Opportunities synopsis, they will be appropriately dispositioned and documented by addendum to this document.

11. **The actions, if any, the Agency may take to remove or overcome barriers to competition before any subsequent acquisition for the supplies or services required:**

A re-compete of MSFC's engineering technicians and trades support services contract is being conducted. This competition is currently in the proposal evaluation phase. This extension will enable continued performance of the contract through the completion of the re-competition of the METTS follow-on contract. Accordingly, there are no other actions the Agency needs to take to remove or overcome barriers to competition.

Title of Procurement: Modification for 3-month Extension to the Marshall Engineering Technicians and Trades Services (METTS) Contract

For the above reasons, full and open competition is not feasible. Therefore, purchase of the services from InfoPro Corporation is the only practical approach.

I hereby certify the facts in this justification and any supporting data used for this justification are accurate and complete to the best of my knowledge.

Chris Singer
Director, Engineering Directorate

2/21/15
Date

I hereby certify that the above justification is complete and accurate to the best of my knowledge and belief. In addition, I hereby determine that the anticipated cost to the Government will be fair and reasonable.

Harry B. Craig
Contracting Officer
Office Manager, Policy & Information Management Office

3-2-15
Date

Concurrence:

Kim E. Whitson
MSFC Procurement Officer

Mar 17, 2015
Date

Approval:

L. Dale Thomas
MSFC Competition Advocate

March 23 '15
Date

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ADDENDUM TO
JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION (JOFOC) PURSUANT TO TITLE 10 U.S.C. 2304(c)(1)

Title of Procurement: Modification for 3 Month Extension to the Marshall Engineering Technicians and Trades Support Services (METTS) Contract

Pursuant to NFS 1804.570 and FAR 5.201 a synopsis of the proposed contract action was posted on the NASA Acquisition Internet Service (NAIS) and the Federal Business Opportunities websites. No other firms requested consideration under this procurement. Therefore, it is determined that there are no other offerors with the capabilities to meet the required technical specification.

I hereby determine that the circumstances of the contract action deem only one source reasonably available.

Melinda L. James
Contracting Officer
Engineering Laboratory Support Office