

**JUSTIFICATION REVIEW DOCUMENT
RFO FAR Part 6 Justification and Approval
for Other than Full and Open Competition**

Program/Equipment: Class approval for Cisco products for the Walla Walla District Operating projects to include Mill Creek, McNary, Ice Harbor, Lower Monumental, Little Goose, Lower Granite, Dworshak, and Lucky Peak Dams for the U.S. Army Corps of Engineers, Walla Walla District.

Authority:

Title 10 United States Code (U.S.C.) §3204(a)(1) as implemented in Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO) FAR 6.103-1 Only one responsible source and no other supplies or services will satisfy agency requirements.

RFO FAR 6.103-1(d) Application for brand-name descriptions.

Class justification is authorized by RFO FAR 6.104(c).

Prepared by: Levi Van Stedum Phone: 509.939.4750
Chief, Electrical Design Date: 27 JAN 2026
E-mail: Levi.P.VanStedum@usace.army.mil

Contracting Officer: Brooke Moore Phone:
Contracting Officer Date: *Reviewed*
E-mail: Brooke.N.Moore@usace.army.mil

Technical: Levi Van Stedum Phone:
Chief, Electrical Design Date: *Reviewed*
E-mail: Levi.P.VanStedum@usace.army.mil

Requirements: Levi Van Stedum Phone:
Chief, Electrical Design Date: *Reviewed*
E-mail: Levi.P.VanStedum@usace.army.mil

Reviews: I have reviewed this justification and find it adequate to support other than full and open competition.

Project Manager:

Jason Williams
Project Manager

Phone: (509) 527-7009

Email: Jason.c.williams@usace.army.mil

Digitally signed by
WILLIAMS.JASON.COLE.1249735740
DN:
CN=WILLIAMS.JASON.COLE.1249735740,
OU=USA, OU=PKI, OU=D&D, O=U.S.
Government, C=US
Date: 2026.10.13 21:36:24 -07'00'

Small Business:

James R. Glynn
Deputy, Small Business Programs

Phone: 509-676-7132

E-mail: james.r.glynn@usace.army.mil

GLYNN.JAMES.ROBERT.1163086235
BERT.1163086235
Digitally signed by
GLYNN.JAMES.ROBERT.11630
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Date: 2026.10.07 12:16:50 -07'00'

NWW Legal Counsel:

Michaela Murdock

Phone: (509) 904-6513

E-mail: michaela.m.murdock@usace.army.mil

 Digitally signed by
MURDOCK.MICHAELA.M.15397
93892
Date: 2026.09.30 15:45:39 -07'00'

**RFO FAR Part 6 Justification and Approval
for Other than Full and Open Competition**

1. Requiring Activity: U.S. Army Corps of Engineers, Walla Walla District Operating Projects, including Mill Creek, McNary, Ice Harbor, Lower Monumental, Little Goose, Lower Granite, Dworshak, and Lucky Peak Dams, Walla Walla, Washington.

2. Contracting Activity: U.S. Army Corps of Engineers, Directorate of Contracting, Walla Walla District (CECT-NWW), 201 North 3rd, Walla Walla, WA 99362.

3. Description of Action: Request approval for a class justification and approval (J&A) to allow Contracting Officers to issue solicitations for new firm-fixed-price commercial brand name requirements for Cisco brand network products for the Walla Walla District operating projects without the requirement to execute a J&A on a contract-by-contract basis. This class J&A will remain in effect until 1 October 2031.

4. Description of Supplies/Services: This requirement is for Cisco brand network equipment necessary to support the Walla Walla District operating projects' control systems and network infrastructure. The equipment includes network switches, routers, and related networking hardware required to maintain compatibility with existing Government Data Acquisition and Control Systems (GDACS) and other network systems within USACE.

Operating Project	Contract Number	FY25
McNary Lock and Dam	W912EF-23-F-0040	\$ 1,076.10
	W912EF-20-F-0103	\$ 173,096.13
	W912EF-22-P-0054	\$ 1,035.70
Ice Harbor Lock and Dam	*PANNWD23-P-000 000221	\$ 6,178.56
Lower Monumental Lock and Dam	W912EF-21-F-0076	\$ 3,846.02
	W912EF-22-F-0052	\$ 38,420.88
	*PANNWD23-P-000 000221	\$ 6,178.56
Little Goose Lock and Dam	W912EF-23-C-0006	\$ 18,565.75
	*PANNWD23-P-000 000221	\$ 6,178.56

Lower Granite Lock and Dam	W912EF-21-F-0075	\$ 17,955.95
	W912EF-22-F-0039	\$ 6,525.58
	W912EF-23-Q-0067	\$ 989.02
	*PANNWD23-P-000 000221	\$ 6,178.56
Dworshak Dam		\$ -
	Total:	\$286,225.36,

Operating Project	Contract Number	FY20	FY21	FY22	FY23	FY24
McNary Lock and Dam	W912EF-23-F-0040				\$4,057.32	\$1,044
	W912EF-20-F-0103	\$652,638				\$168,054
	W912EF-22-P-0054			\$3,905		\$1,035
Ice Harbor Lock and Dam	*PANNWD23-P-000 000221					\$6,178.56
Lower Monumental Lock and Dam	W912EF-21-F-0076		\$14,500			\$3,846
	W912EF-22-F-0052			\$144,861		\$38,420
	*PANNWD23-P-000 000221					\$6,178
Little Goose Lock and Dam	W912EF-23-C-0006				\$70,000.00	\$18,565
	*PANNWD23-P-000 000221					\$6,178
Lower Granite Lock and Dam	W912EF-21-F-0075		\$67,700			\$17,955
	W912EF-22-F-0039			\$24,603		\$6,525
	W912EF-23-Q-0067				\$ 3,728.97	\$989
	*PANNWD23-P-000 000221					\$6,178
Dworshak Dam						0

The anticipated future requirements include major projects such as the Tainter Valve Upgrade Project for Ice Harbor Dam (HLD), Little Goose Lock and Dam (LLA), Lower Granite Lock and Dam (LGA), and Lower Monumental Lock and Dam (LMA); the control stand upgrade for LLA and LGA; the Mill Creek (MCL) Diversion Dam Fish Ladder; and the LLA Navigation Lock LSQ2 upgrade, all of which will require Cisco switches.

Period of Performance: This class J&A shall remain in effect from the date of approval through October 1, 2031.

5. Authority Cited:

Title 10 United States Code (U.S.C.) §3204(a)(1) as implemented in the Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO) FAR 6.103-1 Only one responsible source and no other supplies or services will satisfy agency requirements.

RFO FAR 6.103-1(d) Application for brand-name descriptions.

Class justification is authorized by RFO FAR 6.104(c).

6. Reason for Authority Cited:

a. Background: For over four years, the U.S. Army Corps of Engineers has procured Cisco products for the Walla Walla District operating projects, including Mill Creek, McNary, Ice Harbor, Lower Monumental, Little Goose, Lower Granite, and Dworshak Dam. Although the Cisco product contracts are for almost identical components with standard language, individual J&As have been issued for each separate Cisco product contract. The Government desires to expedite these acquisitions by executing a class J&A and eliminating the need to prepare and approve separate J&As each time these Cisco products are required.

b. Justification: The Cisco brand network equipment is needed to ensure matching equipment with the Government Data Acquisition and Control System (GDACS) and other network systems within USACE. Cisco network equipment is the primary equipment utilized and approved for use on the U.S. Army Corps of Engineers (USACE)

network and on the DoD Approved Hardware List. Because of this, the Walla Walla District has standardized the use of Cisco hardware. Procurement of another brand name would cause issues with standardization, interoperability, and stability. Army Federal Acquisition Regulation Supplement (AFARS) 5139.101-90(a)(1) states, "The Army's Computer Hardware, Enterprise Software and Solutions (CHESS) program, under the Program Executive Office Enterprise Information Systems, is the mandatory source for commercial IT hardware and software purchases. CHESS contracts provide IT products and services that comply with U.S. Army Network Enterprise Technology Command, Army and DoD policy and standards." For network hardware offered by CIO-6 OrderTrak, equipment is almost exclusively Cisco supplied. Because of this, the projects have standardized the use of Cisco hardware. Procurement of another brand name would cause issues with standardization, interoperability, and most importantly network security.

The current field administrative support staff are trained and have significant experience with Cisco brand name network equipment. Utilizing an alternative brand would require additional software and an increase in training to program and maintain the equipment.

If the brand specific products are not purchased, significant negative risks would be introduced to the operation and maintenance of the projects' control systems. Increased complexity will be added to the system, decreasing reliability and maintainability. This exposes the projects to potential cyber security risks which are by nature difficult to defend against without careful management of software updates. A successful network attack or exploitation has potential for failures resulting in loss of power and/or control to critical powerhouse systems responsible for areas such as power generation, Juvenile Fish Facility operation, powerhouse unwatering pumps, crane controls, and wastewater systems. Using alternate network products would require different patches to be installed. The addition of multiple product types adds complexity and increases the workload for project personnel.

Single source supply is standard practice for CIO-6 supplied components and has been sought on an individual basis for operations historically.

c. Alternatives

Alternative 1: Use of Different Brand Network Equipment

Using other systems would result in an estimated cost of \$87,614 per civil works project to set up the new systems to work with existing networks and for the additional labor for maintaining updates. Utilizing a different brand would result in compatibility issues resulting in an estimated 80 hours of labor to apply separate updates and configuration settings and an additional 40 hours a year for keeping this separate brand updated. Average life of a network switch is about 10 years. Therefore, the total additional time to maintain a separate brand on USACE network would be 480 hours. The present

burden rate is \$180. Assuming a 2% raise each year for labor, the total cost for setting up and maintaining a different brand would be \$87,614.

Adding different brands of network equipment could interfere with the current platform that is in place on USACE networks and could result in lack of compliance, failures, and successful cyber security attacks. For network switches utilized in power generation, any down time could result in additional cost to USACE. With a minimum power generation of 80MW, and an estimated \$35 per MW-Hour, a main unit being down costs \$2,800 per hour lost in power generation. For each failure or attack, there would be an estimated cost of \$14,000 and up to 6 months down time depending on the severity of the failure or attack. The cost would be broken down between \$8,000 in electrician costs and HDC labor service fees. This would not be cost-effective to the Government.

Alternative 2: Continue Individual J&As

If this class J&A is not approved, the operating projects will continue to complete individual J&As for each Cisco contract. The trend in the past four years demonstrates increased procurement of Cisco products, leading to three contracts awarded in FY23, with an expected annual cost of \$7,824 in labor per year. The expected cost for the next five years using individual J&As is \$39,118. A five-year class J&A would save the Government approximately \$40,000 in labor.

The Government could continue to issue individual J&As for each separate contract, but a class J&A would substantially reduce time and effort and expedite all these contract awards for Cisco products.

Conclusion: There is no alternative equipment that can be utilized at this time.

d. Impact if Not Approved:

If we do not use Cisco brand network equipment, it would make critical assets vulnerable and increase our cyber-security risk. Utilizing different brands increases risk because each brand will require its own software patches to be installed and some brands could have issues with or not be able to communicate with Cisco brand network equipment without complex communication protocols being implemented. This added complexity, additional tracking, and application of software patches increase the network's attack surface. The larger the attack surface the more vulnerable the network is to cyber-attacks. The Cisco Brand Name is the Enterprise standard based on careful consideration of product capabilities and best-of-breed systems to meet complex cyber-security and network configuration requirements. The new devices must be compatible with existing equipment and configurations.

A more brand diverse system increases complexity, reducing response times to events and delays in patches which increases cyber vulnerability. It is in the Government's best interest to pursue this brand name action to maintain the integrity of the overall system,

reduce potential hardware failures, cyber-attacks, and to ensure that adequate system support is available by the manufacturer.

7. Efforts to Obtain Competition:

Due to the need for compatibility of existing equipment, we must use this brand name product. Vendors that can provide this supply/service will be notified via either formal or informal Request for Quote.

a. Effective competition: Market research indicates that there are numerous other-than small business and small business distributors that can offer the required Cisco equipment. The Army's Computer Hardware Enterprise Software and Solutions (CHESS) is one method of obtaining vendor information. In addition, numerous vendors on the General Services Administration "GSA Advantage" website can provide the required equipment. In accordance with (IAW) Class Deviation 2026-O0017 and DFARS PGI 206.103-170(d), a Sources Sought notice (Notice ID W912EF26RSS23) was posted to SAM.GOV on April 1, 2026 seeking sources for the brand-name requirement of Cisco products for use across the Walla Walla District. No responses were received as a result of this notice.

b. Subcontracting competition: The Government will encourage prime contractors to obtain maximum competition in their subcontracting efforts for any related services or supplies not specifically requiring Cisco brand equipment.

8. Actions to Increase Competition:

Efforts to solicit a separate, like product would prove incompatible with the existing USACE infrastructure and existing equipment. This class J&A supports discrete requirements for Cisco brand network equipment necessary to maintain compatibility with existing systems. The Government has standardized the use of Cisco equipment based on AFARS requirements and DoD Approved Hardware List standards.

Future competition for network equipment will be evaluated as technology standards evolve and if the Government determines that alternative products can meet interoperability, security, and compatibility requirements without substantial duplication of costs. The Government will continue to monitor market developments and assess whether technical data packages or specifications suitable for full and open competition can be developed for future requirements.

9. Market Research:

The market research was conducted by the Walla Walla District Design Branch to determine suitability of networking equipment supporting NWW control systems. Computer Hardware Enterprise Software and Solutions (CHESS) government website

lists several vendors that provide Cisco brand equipment. Additionally, research was performed using GSA and other vendor websites to determine the best cost basis for this requirement. Market research was conducted utilizing the required sources of supply.

The Army's Computer Hardware, Enterprise Software Solutions (CHESS) program, under PEO EIS, is the mandatory source for commercial IT purchases. IAW AFARS 5139.101-90(a)(1) states "The Army's Computer Hardware, Enterprise Software and Solutions (CHESS) program, under the Program Executive Office Enterprise Information Systems, is the mandatory source for commercial information technology (IT) hardware and software purchases. CHESS contracts provide IT products and services that comply with U.S. Army Network Enterprise Technology Command, Army and DoD policy and standards." Purchasers of commercial hardware and software must satisfy their IT requirements by utilizing CHESS contracts and DOD Enterprise Software Initiative agreements first, regardless of dollar value. The Cisco equipment was found to be available under these contract vehicles.

10. Interested Sources:

There are numerous companies on CHESS and GSA. The following companies have expressed interest in providing Cisco products:

- Wildflower International Ltd.
- World Wide Technology LLC
- TD SYNEX Corp.
- FCN Inc.

A full list of IT suppliers can be found on CHESS.

To date, no sources have indicated they can provide alternative brand network equipment that would be compatible with existing USACE infrastructure and meet all security, interoperability, and standardization requirements.

11. Other Facts:

a. Procurement History

The Walla Walla District has a history of procuring Cisco products for at least the past five years to support operating projects. Previous contracts have been awarded on an individual basis with separate J&As for each requirement. The trend demonstrates increased procurement of Cisco products, with the following recent activity:

- FY20: McNary Lock and Dam contracts totaling approximately \$652,639
- FY21: Lower Monumental Lock and Dam (\$14,501) and Lower Granite Lock and Dam (\$67,701)

- FY22: McNary (\$3,905), Lower Monumental (\$144,861), and Lower Granite (\$24,604)
 - FY23: McNary (\$4,057), Little Goose (\$70,000), and Lower Granite (\$3,729)
 - FY25: Ice Harbor (\$6178), Lower Monumental (\$6178), Little Goose (\$6178), Lower Granite (\$6178),
- [REDACTED]

All previous procurements were conducted on a sole source basis citing the need for brand name compatibility with existing systems. The Hydroelectric Design Center (HDC), Walla Walla district engineers, and operating projects have verified the continued need for Cisco products.

b. Other facts.

The Walla Walla District and HDC have standardized with Cisco products that are successfully utilized in the facilities' operations and maintenance programs and processes. This standardization is consistent with Army and DoD policy requiring use of CHES contracts for IT hardware procurement.

12. Technical 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.



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Levi Van Stedum, PE
Chief, Electrical Design

13. Requirements 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.



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Levi Van Stedum, PE
Chief, Electrical Design

14. Fair and Reasonable Cost Determination: I hereby determine that the anticipated price/cost to the Government for this contract action will be fair and reasonable. Individual determinations for subsequent acquisitions of Cisco hardware will be made using competition through CHES in accordance with FAR 15.404-1(b)(1) or other valid method under RFO FAR 15.404-1(b). As part of the basis, certified cost or pricing data will not be required as this is a commercial product, in accordance with RFO FAR 15.403-1(f)(2).

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Brooke Moore
Contracting Officer

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

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Brooke Moore
Contracting Officer