

**JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION
USING SIMPLIFIED PROCEDURES FOR THE ACQUISITION OF COMMERCIAL PRODUCTS AND
SERVICES EXCEEDING THE SIMPLIFIED ACQUISITION THRESHOLD
(AUTHORITY: 41 U.S.C. 1901)**

Identification Number: REQUIREMENTS-26-3860

1. Identification of the agency and contracting activity.

The National Oceanic and Atmospheric Administration's (NOAA) Acquisition and Grants Office (AGO) Western Acquisition Division (WAD), proposes to enter into a contract on the basis of other than full and open competition using simplified procedures for the acquisition of commercial products and services in support of the Oceanic and Atmospheric Research's (OAR) Global Monitoring Laboratory (GML).

2. The nature and/or description of the action being approved.

NOAA intends to award a new contract to Astronics Connectivity System & Certification Corporation (Astronics CSC). A Firm-Fixed-Price (FFP) purchase order is contemplated for award.

3. A description of the supplies or services required to meet the agency's needs (including the estimated value).

The requirement is for the amendment of an existing Federal Aviation Administration (FAA) Supplemental Type Certificate (STC) for GML's Greenhouse Gas Aircraft System (NGAS) to extend certification to additional aircraft platforms. This requirement is structured as one (1) base task for site visit, engineering and certification, with two (2) optional tasks for hardware provisioning and installation support. The Contractor shall provide Non-Recurring Engineering (NRE), hardware kitting, and installation support to establish the structural, power, data, control, and gas flow preconditions required to operate the Line Replaceable Units (LRUs) aboard commercial Boeing 737 aircraft.

The requirement is structured into one (1) base task and two (2) optional tasks:

- **Base Task (Task 1):** The Contractor shall provide engineering and certification services, including updating existing documentation to amend the FAA STC for Boeing 737-800 or MAX series aircraft. This includes structural and Computational Fluid Dynamics (CFD) verification, Master Document List (MDL) updates, and biweekly project management meetings.
- **Optional Task A (Task 2):** The Contractor shall provide recurring Installation Kits and configure the Sabre All-In-One (AIO) Unit to interface with aircraft ARINC 429 ports, enabling 5G data uploads when Weight-on-Wheels (WoW) is engaged.
- **Optional Task B (Task 3):** The Contractor shall provide on-site support to integrate the NGAS hardware into the aircraft's Electrical and Electronics (E&E) bay.

The Contractor is required to provide all necessary project management and technical expertise to secure the STC award within six (6) months of aircraft type identification. The scope assumes the use of standard NGAS components and that sufficient avionics bay space exists to accommodate the system with only minor STC modifications.

[REDACTED] The expected total period of performance for this nonseverable requirement is September 28th, 2026 through September 27th, 2029, with one (1) year for the base task and one (1) year for each optional task (if exercised, optional tasks will be completed concurrently).

4. An identification of the statutory authority permitting other than full and open competition.

The statutory authority permitting this sole source acquisition is 41 U.S.C. 1901, using simplified procedures up to \$9M, in accordance with Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO) 12.201-1.

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

Only one source - Only one source is capable of providing the supplies or services required at the level of quality required because the services are unique or highly specialized. Under prior contract 1305M323PNRMJ0676, Astronics CSC designed/engineered, manufactured, and integrated the current NGAS rack, inlet system, electrical wiring infrastructure, and the Astronics CSC Sabre All-In-One (AIO) Unit for the Boeing 737-900ER platform. This system is highly specialized, requiring direct interfacing with aircraft ARINC 429 air data ports and programmed Weight-on-Wheels (WoW) 5G transmission control. Because Astronics CSC established this foundational structural and electrical architecture, they are uniquely qualified and positioned as the sole source to complete this follow-on requirement of amending the FAA STC for Boeing 737-800 or MAX series aircraft.

Selecting an alternative vendor would necessitate a complete redesign of the Greenhouse Gas (GHG) system. This action would force a new vendor to reverse-engineer the proprietary hardware, software logic, and electrical architecture already established and certified on the 737-900ER platform. No other vendor's hardware could be adapted to meet these specific operational requirements. Developing a replacement AIO unit configuration and structural integration package from scratch would duplicate hundreds of thousands of dollars in baseline NRE costs that the Government cannot expect to recover through competition.

Furthermore, a complete redesign and reverse-engineering effort by a new vendor would cause significant delays to the FAA STC certification amendment process. Any delay in securing the STC amendment directly impedes NOAA's ability to collect critical, continuous atmospheric data essential for global emissions mitigation. To ensure mission continuity and avoid unacceptable delays, Astronics CSC is the only responsible source capable of executing the required structural and CFD verification, STC amendments, and hardware integration aboard scheduled commercial flights without causing serious injury to the Government's scientific objectives.

6. A description of efforts made to ensure that offers are solicited from as many potential sources as possible, including whether a notice was or will be publicized as required by FAR Part 5 and, if not, which exception under FAR Part 5 applies.

The Government completed adequate market research, to include a sources sought posting. A Sources Sought notice was published to SAM.gov on 13 June, 2026 with a deadline for responses of 21 June, 2026. A total of four (4) responses were received, one other than small business (SB), one SB, one hubzone SB, and one service-disabled veteran owned SB. Of the four (4) responses, two (2) were non-compliant and did not submit the requested information. However, all four (4) responses were evaluated by the technical POC and all interested vendors were found not to be capable of performing the requirement.

Additionally, RFO Part 5 applies to this requirement. As such, a Presolicitation Notice of Intent (NOI) was posted to SAM.gov on 24 August, 2026 with a closing date of 8 August, 2026. No responses were received.

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

The contracting officer determines that the anticipated price(s) will be fair and reasonable based on RFO 12.204(a) price reasonableness. Prior to award of the proposed contract, price information will be obtained from the contractor and a price analysis will be performed and documented to sufficiently determine that the cost to the Government of the proposed acquisition will be fair and reasonable. The Government anticipates using a comparison of the proposed prices to the historical prices paid on the previous purchase order to determine price reasonableness.

8. The market research conducted (see FAR Part 10) and the results or a statement of the reason market research was not conducted.

Market research was conducted by WAD and OAR/GML to identify capable sources and to evaluate the availability of the marketplace to meet the requirement. As stated above under number 6, a sources sought notice was posted to SAM.gov, followed by a notice of intent to sole source. Based on the results of market research, the Government determined that a limited number of additional vendors were available, but none were capable of fulfilling the

Government's requirements. Market research confirmed that while general aerospace engineering firms exist, none possessed the baseline engineering data, direct component knowledge, and established flight-certified AIO configuration used for the NOAA NGAS provisions on the Boeing 737 platform. Selecting another source would necessitate complete redesign and re-certification.

9. Any other facts supporting using other than full and open competition.

All facts have been documented herein. There are no additional facts to be reported in this section.

10. A listing of the sources, if any, that expressed an interest in the acquisition in writing.

Sources Sought respondents:

- [REDACTED]
 - [REDACTED]
 - Determined not capable
- [REDACTED]
 - [REDACTED]
 - Determined not capable
- [REDACTED]
 - [REDACTED]
 - Determined not capable
- [REDACTED]
 - [REDACTED]
 - Determined not capable

11. A statement of the actions, if any, the agency may take to remove or overcome any barriers to competition before any subsequent acquisition for the supplies or services required.

The Government will continue to monitor the commercial avionics market for standardized data acquisition units and open-architecture air inlets. Should future program requirements necessitate a full re-design or new system baseline, competition will be pursued to the maximum extent practicable.

12. CERTIFICATION

The JOFOC has been prepared and certified by:

Technical/Requirements Personnel:

I certify that the above narrative is accurate and contains complete data necessary to support the recommendation for other than full and open competition.



Colm Sweeney
Associate Director for Science, NOAA GML
Division Lead for Transitions, Technology, Engineering and Applications (TTEA)

Date

13. REVIEW AND CONCURRENCE

Review:

Office of General Counsel



Florence N. Bridges
Senior Attorney

Date

14. APPROVAL

Approve:

Contracting Officer

I certify this justification is accurate and complete to the best of my knowledge and belief.



Molly Tovado
Contracting Officer

Date