

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
Kennedy Space Center (KSC)
JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION
(JOFOC)
For Commercial Crew Transportation Capabilities (CCtCap) Contract
NNK14MA74C

1. Federal Acquisition Regulation (FAR) 6.104-1(a)(1) – Identification of the agency and the contracting activity, and specific identification of the document as a “Justification for other than full and open competition.”

This document is a justification for other than full and open competition prepared by National Aeronautics and Space Administration (NASA) Kennedy Space Center (KSC).

The procuring agency is NASA, and the contracting activity is KSC.

2. FAR 6.104-1(a)(2) – The nature and/or description of the action being approved:

This justification provides the rationale for contracting by other than full and open competition to award a new work modification to the Commercial Crew Transportation Capability (CCtCap) Contract between NASA and Space Exploration Technologies Corporation (SpaceX or Contractor) under contract number NNK14MA74C for six additional Post Certification Missions (PCMs) with an estimated period of performance from September 2026 through December 2030.

The current period of performance of the Contract ends on December 31, 2030. The Contract specifies that the maximum quantity of PCMs to be issued to SpaceX is fourteen. NASA has already ordered fourteen PCMs; the Contractor has successfully completed 11 PCMs, with PCM-12 currently on-orbit docked to the International Space Station (ISS) and [REDACTED]

[REDACTED] Approval of this JOFOC will allow NASA KSC to award six and concurrently order up to three additional PCMs (PCMs 15, 16, and 17) from SpaceX.

3. FAR 6.104-1(a)(3) – A description of the supplies or services required, to meet the Agency’s needs (including the estimated value):

On September 16, 2014, NASA KSC awarded CCtCap contracts to The Boeing Company (Boeing) and SpaceX; the contracts include a Firm-Fixed Price (FFP) Research and Development (R&D) element (CLIN 001) with FFP Indefinite Delivery/Indefinite Quantity (IDIQ) service elements (CLINs 002 and 003).

The purpose of the CCtCap contracts is to complete the final development and certification of U.S. commercial crew space transportation capabilities to provide safe, reliable, and cost-

effective transportation to and from the ISS, and to provide those services as PCMs after the systems are certified.

The Contract's CLIN structure is as follows:

- CLIN 001 is FFP R&D for Design, Development, Test, and Evaluation (DDTE)/Certification of the Contractor's Crew Transportation System (CTS).
- CLIN 002 is FFP IDIQ Services for PCMs to the ISS. Each contract specifies a guaranteed minimum of two PCMs. The Boeing contract specifies a maximum of six PCMs and the SpaceX contract specifies a maximum of fourteen PCMs. The CCtCap contract requires the capability of providing PCMs about every six months.
- CLIN 003 is FFP IDIQ Services for Special Studies. Special studies task orders enable NASA to identify impacts on the Contractor's design, schedule, and cost/price resulting from potential new, or changes to existing, Government requirements.

In 2015, NASA KSC ordered two PCMs (i.e., PCMs 1 and 2) from both Boeing and SpaceX, which satisfied the minimum guarantee under the CCtCap contracts. Subsequently, in December 2016, NASA KSC ordered four additional PCMs (i.e., PCMs 3-6) from both Boeing and SpaceX, invoking the maximum number of PCMs under each of the original CCtCap contracts.

SpaceX achieved certification under CLIN 001 in September 2020 and began providing transportation services for crew rotations to the ISS in November 2020. Subsequently, the need for additional missions became apparent. Boeing had not attained certification of their CTS as planned in the contract schedule and NASA announced the extension of ISS operations to 2030, thus additional missions were added to the SpaceX contract by two separate actions with JOFOCs approved in December 2021 and August 2022. This resulted in NASA awarding SpaceX eight additional PCMs (i.e., PCMs 7-14) to ensure continued uninterrupted crew access to the ISS.

Authority to Proceed (ATP) for all fourteen Crew Dragon PCMs has been granted to SpaceX, while Boeing has been granted ATP for Starliner PCMs 1-3. Starliner PCM-1 is planned to fly an uncrewed mission prior to certification and [REDACTED]

In March 2026, several developments materially changed NASA's assessment of crew transportation needs. First, mission durations for PCM-12 and subsequent missions were reduced based on agency needs, advancing the date by which NASA requires the next crew rotation mission and all subsequent missions. [REDACTED]

[REDACTED]

In order to ensure continued uninterrupted operations of the ISS through 2030, NASA requires up to six additional missions to meet crew rotation needs. [REDACTED]

[REDACTED] and recognizing that no other company is capable of supporting crew rotation services, it is determined that SpaceX is the only responsible source for additional missions in the near term.

As a result of the above and other rationale described in section 5 below, NASA has a need for up to six additional PCMs (i.e. PCMs 15 - 20) from SpaceX to ensure uninterrupted crew access to the ISS. The current FFP PCM contract prices were either competitively awarded or negotiated, and all prices were determined to be fair and reasonable. The total estimated value of this action to award six additional PCMs to SpaceX is approximately [REDACTED]. The estimated period of performance of this action is from September 2026 through December 2030.

4. FAR 6.104-1(a)(4) – An identification of the statutory authority permitting other than full and open competition:

The statutory authority permitting other than full and open competition is 10 U.S.C. 3204(a)(1), as implemented by FAR 6.103-1 Only one responsible source and no other supplies or services will satisfy agency requirements.

5. FAR 6.104-1(a)(5) – A demonstration that the proposed contractor’s unique qualifications or the nature of the acquisition requires use of the authority cited:

The rationale supporting the use of 10 U.S.C. 3204(a)(1) is that only one responsible source can provide the crew transportation services required to meet NASA’s near-term ISS crew rotation needs.

NASA has ordered all SpaceX CCtCap missions currently available on contract, [REDACTED] [REDACTED] SpaceX has successfully completed eleven crew rotation missions, with a twelfth mission in progress, and has demonstrated re-flight capability to meet NASA’s crew rotation requirement of one mission every six months.

In contrast, Boeing continues to experience significant technical and schedule challenges, delaying the certification of their CTS. As of May 2026, Boeing’s PCM-1 mission has been delayed, and Boeing has not yet demonstrated the capability to meet NASA’s mission needs.

Boeing's development history demonstrates a clear pattern of extended delays between major flight milestones. More than two years elapsed between Orbital Flight Test-1 in 2019 and Orbital Flight Test-2 in 2022, as Boeing worked to address software, timing, and communication system deficiencies. An additional two years passed before Boeing launched the 2024 Crewed Flight Test (CFT). During CFT, the spacecraft experienced multiple significant anomalies. [REDACTED]

[REDACTED] NASA and Boeing plan to conduct at least one [REDACTED] uncrewed mission before attempting another crewed flight. Given the scale of the required work and Boeing's historical two-year cycle between major flight attempts, Boeing is not ready to provide operational crewed PCMs within NASA's required timeframe. [REDACTED]

NASA currently has no contracted SpaceX crew rotation missions beyond the PCM-14 mission in [REDACTED]. Maintaining a continuous six-month ISS crew rotation cadence requires that authorization to proceed for the next mission be issued approximately 24 months before launch to support crew integration, mission planning, vehicle processing, safety reviews, and joint ISS visiting-vehicle analysis. Without additional missions ordered in this window, a gap in U.S. ISS crew access may begin as early as [REDACTED].

NASA has evaluated whether other commercial entities could meet crew rotation needs within the necessary schedule and concluded that no domestic provider has progressed sufficiently in the development, design, test, and evaluation of an integrated crew transportation system capable of meeting ISS visiting-vehicle requirements. In addition, NASA experience shows that certification of a human-rated transportation system, encompassing end-to-end design, subsystem qualification, uncrewed and crewed flight test, ISS integration, and safety/mission assurance, typically requires not less than six years to complete once contracts are in place. Although additional commercial providers are developing crew transportation concepts, none are expected to achieve NASA CTS certification until after the period in which the subject ISS crew rotation services are needed.

Should Boeing become fully certified, NASA will require additional crew rotation missions beyond those currently contracted, to sustain ISS operations. NASA must order the next three near-term SpaceX missions concomitantly with increasing the CCtCap maximum quantity to accommodate the full spectrum of credible mission-demand scenarios. [REDACTED]

[REDACTED] Further, this acquisition enables various mission uncertainties including but not limited to: 1) Boeing promptly achieving certification and each provider alternating one mission per year, 2) Boeing failing to achieve certification and support operations and SpaceX providing uninterrupted crew access through 2030, and 3) unknown contingencies. [REDACTED]

Increasing SpaceX's CCtCap maximum quantity from 14 to 20 is therefore essential to ensure NASA can order the near-term missions needed to preserve ISS access while also covering the full range of realistic provider-readiness outcomes.

These additional missions do not replace Boeing's ordered PCMs; rather, they are required to satisfy total ISS crew rotation demand. No other provider can supply this capability within the timeframe required.

In summary:

- Given the absence of any currently certified second provider, the time required for potential new-entrant providers to achieve CTS certification, the historically multi-year anomaly-resolution cycles associated with Boeing's crew system development, and the immediate need to prevent interruptions to NASA's six-month ISS crew rotation cadence, SpaceX is the only responsible source able to provide the additional near-term Post Certification Missions required to ensure continuous U.S. crew access to the ISS.
- ISS crew rotations are required through 2030. NASA's analysis of required SpaceX missions through 2030 demonstrates a need for up to six additional SpaceX missions.
- Standard ATP and readiness lead times, contingency capability, and crew rotation needs require immediate ordering of up to three SpaceX missions.

6. FAR 6.104-1(a)(6) – A description of the efforts made to ensure that offers are solicited from as many potential sources as practicable, including whether a notice was or will be publicized as required by part 5 and, if not, which exception under part 5 applies:

A notice to the Government Point of Entry (GPE) website (Sam.gov) was published on May 18, 2026, in accordance with FAR part 5.1. This posting informed potential sources of NASA's intent to award this sole-source modification to SpaceX. The results of this synopsis are summarized in Section 10 below.

7. FAR 6.104-1(a)(7) – A determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable:

The Contracting Officer's signature on this document indicates that the Contracting Officer has determined that the anticipated cost to the Government will be fair and reasonable. The Contractor must be required to submit a proposal, to be evaluated and negotiated by the Government. Prior to execution of the contractual instrument, a proposal analysis will be performed. The proposal analysis will ensure that the final agreed-to price for the contract action is fair and reasonable. The proposed pricing will be determined fair and reasonable based on a comparison to historical prices paid by the Government, published historical prices paid by others entities, independent Government cost estimates, and analysis of data other than certified cost or pricing data provided by the offeror.

8. FAR 6.104-1(a)(8) – Description of the market research conducted, and the results, or a statement of the reason market research was not conducted (e.g., urgent, and compelling requirement):

NASA conducted extensive multi-year market research to determine whether any domestic commercial provider, beyond the current CCtCap contractors, could feasibly deliver a fully certified, ISS-compatible crew transportation system within the timeframe required to maintain continuous U.S. presence on the ISS.

This research effort incorporated:

- Industry responses to the 2021 Commercial Crew Transportation RFI and the 2026 NASA Low Earth Orbit Transportation RFI.
- Observations through ongoing Commercial Crew Space Capability-2 (CCSC-2) Space Act Agreements.
- NASA’s operational and programmatic experience executing and overseeing the CCtCap contracts with Boeing and SpaceX.
- Review of publicly available aerospace industry data, including vehicle development progress, announced milestones, demonstrated performance, and schedule reliability across the commercial sector.

Based on the totality of market research:

- Only two domestic companies, SpaceX and Boeing, are currently pursuing integrated crew transportation systems capable of meeting ISS compatibility requirements by 2030.
- Only SpaceX is presently certified and operational, with demonstrated six-month mission cadence and immediate ability to support ISS rotation requirements.
- Boeing’s Starliner system remains uncertified, [REDACTED]
[REDACTED]
- All other U.S. aerospace companies are in early development, lack human-rated spacecraft, or have no reasonable path to complete design, development, and test, and achieve NASA certification, until after 2030.
- While additional commercial providers may achieve capability sometime during or after 2030, historical certification timelines under CCtCap, current industry maturity, and available Government resources make any new certified provider with PCM capability by end of 2030 highly unlikely.

Given the current state of the U.S. commercial spaceflight industry, SpaceX and Boeing remain the only sources capable of meeting NASA’s required timeframe for safe, reliable, and continuous crew access to the ISS. Among these, only SpaceX provides certified, operational service today, making its capability essential to meet uninterrupted ISS crew rotation commitments.

9. FAR 6.104-1(a)(9) – Any other facts supporting the use of other than full and open competition:

NASA’s human-spaceflight operations require an assured-access posture that prevents any single-provider development slip from threatening continuous crew presence aboard the ISS. As such, while Boeing is developing their CTS, NASA currently maintains a strategy for crew transportation, which necessitates overlap in mission planning and, at times, parallel preparation of both the SpaceX and Boeing commercial systems. This redundancy is intentional, not duplicative, and is essential to protect against the operational and safety risks associated with provider unavailability or delayed readiness.

Also, consistent with 10 U.S.C. § 3204(a)(4), the United States Government has binding obligations under its international agreements with the ISS Partners to provide transportation and rescue capability for all ISS crews, including Canadian, European, and Japanese astronauts. Under Article 6.1.a.22 and 23 of the Memorandum of Understanding (MOU) with the Government of Japan; Section 6.1.a.20 and 21 of the MOU with the European Space Agency; and Section 6.1.b.14 and 15 of the MOU with the Canadian Space Agency, the U.S. is legally required to “provide or arrange for provision of crew rotation” and “provide or arrange for provision of crew and rescue capability.” NASA and its Partners cannot maintain their crews onboard the ISS without ensured, continuous transportation and emergency return capability. Without safe, reliable, human-rated U.S. access to space, the ISS cannot operate, and the U.S. would be in breach of its international obligations.

In addition, NASA maintains bilateral service-exchange arrangements with ROSCOSMOS, including integrated crew flights at a rate of approximately one per year on Soyuz and U.S. Crew Vehicles. ROSCOSMOS has stated it will not fly on a provider’s PCM until the third PCM has demonstrated consistent mission success and safety of flight. [REDACTED]

[REDACTED] Assuring sufficient SpaceX mission quantity is therefore essential for meeting both Partner-MOU and bilateral exchange commitments.

The ISS itself is a multibillion-dollar national asset that requires a continuous U.S. on-orbit presence to ensure safe, sustained operation. The facility’s design, risk profile, and operational tempo require a guaranteed ability to rotate crew, respond to anomalies, and execute emergency return contingencies at all times. Assured U.S. access to a certified crew transportation system is critical to protecting the ISS, its crew, and the research conducted through the ISS National Laboratory. This requirement cannot be met if NASA is dependent on a single provider; redundancy between at least two human-rated systems is necessary to maintain uninterrupted crew transportation and rescue capability. Relying solely on one system in any given year would present unacceptable risk to crew safety and ISS mission assurance.

Given these binding international obligations, bilateral commitments, and the operational necessity of redundant crew access, and because no other company is capable of providing the required crew transportation services within the needed timeframe, SpaceX is the only

responsible source able to meet NASA's near-term obligations. SpaceX is also the only contractor that can provide the redundancy required to ensure the U.S. continues to meet its commitments to its ISS Partners while maintaining uninterrupted access to the orbital facility.

10. **FAR 6.104-1(a)(10) – A listing of the sources, if any, that expressed an interest in writing in the acquisition:**

A notice of NASA's intent to award this sole-source action was synopsized on the GPE website (Sam.gov) per FAR part 5.2 (See Section 6 above). The Notice of Intent was published on May 18, 2026 with responses due on June 2, 2026. No companies expressed an interest in this acquisition.

11. **FAR 6.104-1(a)(11) – A statement of 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 Agency will continue to examine the market in the future for alternative solutions or new sources before executing any subsequent acquisitions for the same requirements.

Commercial Crew Transportation Capabilities Contract – Additional Missions
JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION
SIGNATURE PAGE

Technical Representative: I certify that the facts presented in this justification are accurate and complete.

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David L. Grau
Technical Representative

Contracting Officer: I hereby certify that the above justification is complete and accurate to the best of my knowledge and belief.

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Ricardo Santos-Concepcion
Contracting Officer

CONCURRENCES:

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Edwin Martinez
KSC Competition Advocate

Commercial Crew Transportation Capabilities Contract – Additional Missions
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