

Justification for Other than Full and Open Competition CT7-9C3 Engine Spares

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by FAR Subpart 6.3 and in accordance with the requirements of FAR 6.303-1, the justification for the use of the statutory authority under FAR Subpart 6.3 is justified by the following facts and rationale required under FAR 6.303-2 as follows:

- (1) Agency and Contracting Activity— US Coast Guard, Aircraft Repair and Supply Center (ARSC), C144 Supply Cell, Elizabeth City, NC, proposes to enter into a contract on a basis other than full and open competition.
- (2) Nature and/or description of the action being approved. – The U.S. Coast Guard C144 Supply Cell, Aircraft Repair and Supply Center (ARSC) Elizabeth City, NC has a requirement on a sole source basis to purchase spare parts for the newly introduced C144 Aircraft.
- (3) Description of Supplies/Services—Initial Provisioning of spares to provide maintenance support of the CT7-9C3 engine manufactured by General Electric Company Aircraft Engines, 1000 Western Avenue, Lynn, MA 01910 (USA). The U. S. Coast Guard intends to negotiate only with the Original Equipment Manufacturer (OEM), General Electric (99207). The quantities were determined by comparison of the Coast Guard V-metric model, CASA’s OPUS model, and review of the H60 engine repair contract.
- (4) Identification of Statutory Authority Permitting Other Than Full and Open Competition
The statutory authority permitting other than full and open competition is 10 USC 2304(c) (1) implemented by the Federal Acquisition Regulation (FAR) Subpart 6.302-1 entitled “Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements”.
- (5) Demonstration That the Nature of the Acquisition Requires Use of the Authority Cited.
The Coast Guard does not own the rights to the technical manuals, publications or data these are proprietary to the OEM. Using parts from other than the OEM would compromise the integrity of the aircraft and the performance of the engine.
- (6) Description of efforts made to ensure that offers are solicited from as many potential sources as is practicable. The Coast Guard plans to establish a New Product Development to pursue additional sources of supply for spares. However at this time the Coast Guard does not have data rights.
- (7) Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable. It is the Contracting Officer’s opinion that price offered is fair and reasonable based on comparison of the published price list by CASA, GE, and analysis on other than cost and pricing data.
- (8) Description of Market Research. CASA, the C144 aircraft OEM, and GE, the engine OEM own the manuals, publications and data. The Coast Guard does not have any rights to technical data. At this time General Electric is the sole source for the spares. However, a Sources Sought Notice for spares for the CASA HC-144A is posted on FedBizOPs, so far no interested parties have responded.
- (9) Any Other Facts Supporting the Use of Other Than Full and Open Competition. The

Coast Guard does not own the data rights and does not anticipate purchasing these data rights. Therefore, it would be difficult to take steps to foster competition as the manufacturing performance and acceptance data are proprietary and the Coast Guard does not have adequate technical data to provide to potential offerors at this time. However, the Coast Guard plans to establish a New Product Development to pursue additional sources of supply.

(10) A Listing of the Sources, if Any, That Expressed, in Writing, an Interest in the Acquisition.

At this time a sources sought notice is posted on FedBizOps for spares for the HC- 144A. We have not received any inquires from this notice. A combined synopsis/solicitation will be issued.

(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 Supplies or Services Required.

The Coast Guard does not own the data rights and does not anticipate purchasing these data rights. Therefore, it would be difficult to take steps to foster competition as the manufacturing performance and acceptance data are proprietary and the Coast Guard does not have adequate technical data to provide to potential offerors.

(12) Contracting Officer's Certification

I certify that the data supporting the recommended use of other than full and open competition is accurate and complete to the best of my knowledge and belief.

Contracting Officer

Date

(13) Technical/Requirements Personnel Certification

I certify this requirement meets the Government's minimum need and that the supporting data, which forms a basis for this justification, is complete and accurate.

Technical Representative

Date

signature on file