



**LIMITED-SOURCES JUSTIFICATION
ORDERS OR BPAs EXCEEDING THE SIMPLIFIED ACQUISITION THRESHOLD
J&A-22-00130**

This acquisition is conducted under the authority of the Multiple-Award Schedule Program, 41 U.S.C. 152(3), Competitive Procedures, and 40 U.S.C. 501, Services for Executive Agencies.

1. Agency and Contracting Activity.

The Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Office of Acquisition Management (OAQ), on behalf of Homeland Security Investigations (HSI), Repository for Analytics in a Virtualized Environment (RAVEN) program proposes to award a delivery order against General Services Administration (GSA) Multiple Award Schedule (MAS) Information Technology (IT) pursuant to FAR 8.405-6(a), Limiting Sources.

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

(a) Type of action: Firm-fixed-price delivery order

(b) Amount the current J&A is justifying: [REDACTED]

(c) Brief Description: ICE/OAQ intends to procure, on a sole source basis, ArcGIS World Geocoder Software Licenses from the following company:

Environmental Systems Research Institute, Inc. (ESRI)
380 New York Street
Redlands, CA 92373-8100

3. A description of Supplies/Services.

ICE requires an unlimited-use ArcGIS World Geocoder software license to maintain operations of the ICE Geospatial Portal (IGP), a component of the RAVEN program. The proposed procurement has an estimated total cost of [REDACTED] for a base as follows:

Period	Duration	Total Price
Base	12 Months	[REDACTED]

Many of RAVEN's operations are supported by processing and analyzing location data which is often available in the form of street addresses. The processing and analysis of location data is most effective if the street addresses are converted to geographic coordinates. A geocoder enables the conversion of addresses to geographic coordinates. The geographic coordinates are a key requirement for performing analysis on the data. The different types of analysis can include location analysis of persons of interest, ICE resources, and ICE personnel allocations by geography. Geocoded address data also support other analysis such as proximity, spatial correlation, and link. ESRI's ArcGIS World Geocoder software maps global addresses quickly and accurately behind the firewall. Global enterprises can input addresses from around the world and put them on a map using one single locator. ArcGIS World Geocoder is licensed as a package from ESRI that consists of ArcGIS Enterprise software, data/locators, and professional services.



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IGP currently receives access to ArcGIS World Geocoder through an order against the DHS ESRI Enterprise License Agreement (ELA) Blanket Purchase Agreement (BPA). This sole source BPA is a mandatory-for-use strategic sourcing vehicle for Geographic Information System software for DHS Components.

However, the number of ArcGIS World Geocoder licenses needed by RAVEN is anticipated to exceed the allowance available in the licenses under the BPA. The ELA provides 5,000,000 credits per year for geocoding across the DHS Enterprise (DHSE). Historically, the DHSE uses approximately 3,000,000 credits per year. The RAVEN platform is in the process of ingesting data and users from the outgoing FALCON System. The RAVEN platform has many associated analytic tools that incorporate geospatial capabilities, and the inclusion of the FALCON user base into RAVEN is expected to grow rapidly in the coming weeks and months. This means geocoding usage and activities will increase exponentially. HSI believes IGP's November 2021 geocoder usage of 406,000 requests most closely approximates usage when RAVEN is fully deployed and the ingestion is completed. The IGP for RAVEN alone would amount to 4,060,000 credits per year and, considering DHS alone uses about 3,000,000 credits per year, far exceed the amount that is a term and condition of the DHS BPA and thus cannot be purchased on the DHS BPA.

The unlimited license required to satisfy ICE's needs is not available on the BPA. Therefore, ICE intends to purchase an unlimited license directly against ESRI's MAS Information Technology contract.

4. Authority and supporting rationale.

Authority:

Select only one of the following circumstances justifying limiting sources pursuant to FAR 8.405-6(a)(1)(i) below and demonstrate the proposed contractor's unique qualifications to provide the required supply or service.

- ☐ 8.405-6(a)(1)(i)(A) An urgent and compelling need exists, and following the ordering procedures would result in unacceptable delays.
- ☒ 8.405-6(a)(1)(i)(B) Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized.
- ☐ 8.405-6(a)(1)(i)(C) In the interest of economy and efficiency, the new work is a logical follow-on to an original Federal Supply Schedule order provided that the original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures. The original order or BPA must not have been previously issued under sole-source or limited-sources procedures.



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Rationale:

ICE/OAQ intends to procure ArcGIS World Geocoder software licenses through the Multiple Award Schedule Program under the authority of 41 U.S.C. 152(3), Competitive Procedures, and 40 U.S.C. 501, Services for Executive Agencies pursuant to the authority selected above.

ESRI is the only source capable of meeting the requirement because its proprietary ArcGISWorld Geocoder licenses are unique and highly specialized. ICE requires a geocoder software with the following functionalities:

- Fusing of disparate data and Visualization (to also include temporal data)
- Geocode/Geo-locate Data
- Performing Spatial/Attribute/Proximity Analysis (to include select by attribute, buffer spatial features, geo-fencing, slope calculation)
- Analyzing Line of Sight (LoS) (to support counter sniper and/or antenna/tower placement)
- Scheduling Fleet/Asset Routing
- Analyzing Service Area & Drive Time modeling
- Tracing of networks, systems, and infrastructures Conducting Geostatistical Analysis (to include performing spatial statistics, assess risk factors, as well as link data, graphs, and maps dynamically)
- Optimizing Workflows for Data and Cartographic Production (to include edit controls and versioning)
- Modeling Consequence Assessment (to include support for existing Homeland Security/Homeland Defense models and the ability to build, combine and analyze new models that address crime/gang analytics)
- Providing upgrades/updates to meet both emerging data modeling uses (i.e., Artificial Intelligence, Machine Learning) and DHS information
- Can be integrated into ICE Geospatial Portal (IGP) without additional engineering technology/sensitive system requirements
- Training, to include in-person, virtual, and on-demand courses to ensure DHS users have the requisite knowledge and tradecraft to operate geospatial capabilities

The Government reviewed offerings from ESRI, [REDACTED], open sources, and other potential solutions. However, only the ArcGIS World Geocoder is capable of meeting all of the requirements. The [REDACTED], and the open source options all lacked many of the critical features needed for this requirement. Specifically, they lacked the integrated ability to implement Modeling Consequence Assessment (to include support for existing Homeland Security/Homeland Defense models and the ability to build, combine and analyze new models that address crime/gang analytics); or the ability to trace networks, systems, and infrastructures Conducting Geostatistical Analysis (to include performing spatial statistics, assess risk factors, as well as link data, graphs, and maps dynamically).

Further, the ESRI ArcGIS World Geocoder is the only product available that meets the functional requirements to support the geocoding and address conversion needs of several mission critical systems within ICE's RAVEN program as well as other ICE programs outside of RAVEN that utilize the ICE Geospatial Portal. ICE and DHS have both invested and integrated ESRI geospatial capabilities throughout its various missions and operational/business processes. There



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are numerous mission critical systems and applications department-wide that were designed around the ESRI software and product platform and continue to rely on the ESRI server-side environment. For example, ICE requires a global geocoder which integrates into the IGP without additional engineering technology/sensitive system requirements. Integration within the IGP portal is critical to ICE's mission as the IGP portal is the approved geospatial support system used within ICE. Without this software, users of IGP will not be able to geocode persons/areas of interest as they relate to active investigations. A solution without this capability would pose significant technical and cost risks with an attempt to use competing technology stack to drive these programs.

The Government determined that there are no competing products and solutions that possess the required functional requirements. In addition, ESRI owns the exclusive rights to sell, distribute and maintain the product as developed and delivered and does not authorize third party resellers. Therefore, ESRI is the only source capable of satisfying this requirement.

5. Determination by the ordering activity contracting officer that the anticipated order represents the best value consistent with FAR 8.404(d).

The Contracting Officer has determined that issuing the proposed delivery order for ESRI software represents the best value and will result in the lowest overall cost, considering price and administrative costs, to meet the Government's needs. This delivery order will be placed in accordance with FAR 8.404, "Use of Federal Supply Schedules." The General Services Administration (GSA) has already negotiated fair and reasonable pricing rates. GSA has determined the prices under schedule contract GS35F253CA, to be fair and reasonable. Additionally, the Contracting Officer will compare the contractor's price against their GSA schedule pricing and historical pricing for same items.

6. A description of the market research conducted among schedule holders and the results, or a statement of the reason market research was not conducted.

The Government conducted an Analysis of Alternatives which involved surveying GSA Schedules and open source offerings for geocoding solutions. In addition to ESRI, [REDACTED] were considered. Although there are resellers for [REDACTED] on GSA, these solutions do not meet the Government's requirements and cannot be considered viable solutions. When compared to the Government's requirement, only ESRI met all of the functional requirements.

On [REDACTED] ESRI confirmed that the ArcGIS World Geocoder, and the software licensing and Professional Services components included in the product, is sold direct and supported and maintained only through ESRI.

7. Any other facts supporting the justification.

The ESRI software is already approved under the Department's information technology (IT) review process and is architecturally compliant with the DHS technical reference model (TRM) and other government IT standards including Section 508 accessibility requirements for persons



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with special needs. Compliance with these standards ensures compatibility, interoperability, and seamless integration with existing DHS IT systems and investments and alignment to the Department's geospatial technology vision.

- 8. A statement of actions, if any, the agency may take to remove or overcome any barriers that led to restricted consideration (i.e., limited sources) before any subsequent acquisition for the supplies or services is made.**

The Government is committed to fostering competition and intends to continue to refine all technical specifications to ensure they are the least restrictive as possible. In addition, the Government intends to continue to periodically review the marketplace to determine if other vendors can support our technical requirement.

- 9. DHS intends to post this requirement on SAM.gov pursuant to FAR 8.405-6(a)(2).**

10. Technical/Requirements Personnel Certification.

Pursuant to FAR 8.405-6(c)(2)(x), I certify that this requirement meets the Government's minimum need and that the supporting data, which form a basis for the Limited-Sources Justification, are accurate and complete.

[Redacted Signature]

Technical Representative/COR

[Redacted Signature]

Date

11. Contracting Officer Certification and/or Approval

Pursuant to FAR 8.405-6(c)(2)(ix), I certify that the Limited-Sources Justification is accurate and complete to the best of my knowledge and belief:

[Redacted Signature]

Contracting Officer

[Redacted Signature]

Date