



United States Department of the Interior
INTERIOR BUSINESS CENTER
Washington, DC 20240

LIMITED-SOURCES JUSTIFICATION
AUTHORITY: FAR 8.405-6 and 40 U.S.C 501

SOL # 140D0422Q0872



This acquisition is conducted under the authority of the Multiple Award Schedule Program.


1. Identification of the agency and contracting activity, and specific identification of the document as a “Limited-Sources Justification.”

This is a Limited Source Justification executed by the Department of the Interior (DOI), Interior Business Center (IBC), Acquisition Services Directorate (AQD), Division 1 Branch 2, on behalf of the DOI, Office of the Secretary, Office of the Wildland Fire (OWF).

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

The purpose of this action is to issue a firm-fixed-price limited source follow-on order to procure the FirstNet Band 14 wireless services for OWF’s FireNet devices. The Order will be issued against AT&T Mobility, LLC (AT&T Mobility)’s General Services Administration (GSA)’s Federal Supply Schedule (FSS) contract 47QTCA19D00MV. The original Order was awarded to AT&T Mobility on September 24, 2021, which included both FirstNet equipment (i.e., tablets, cellular phones, routers, etc.) and services to provide wireless coverage for the devices. AT&T Mobility is a sole source provider for the FirstNet products and services under the partnership between the Department of Commerce’s FirstNet Authority Program Office and AT&T Mobility. A noncompetitive solicitation will be issued to AT&T Mobility under the FSS, Multiple Award Schedule (MAS).

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

The wireless service for OWF’s existing 912 devices that are for wildland fire incident management teams, Area Command Team, and National Incident Management Organization to develop and maintain a common Incident Technology Support Specialist support framework with data, voice, and push to talk services. The period of performance for this order is from September 28, 2022 to September 27, 2023 plus four (4) 12-month Option Periods and a potential extension up to six month under FAR 52.217-8. The totalvalue for this award is estimated at  including the four Option Periods and the potential extension period under FAR 52.217-8. The table below shows a cost breakdown:

Period of Performance	QTY	Unit of Issue	Unit Price	Extended Price
9/28/2022 - 9/27/2023	12	Month		
9/28/2023 - 9/27/2024	12	Month		
9/28/2024 - 9/27/2025	12	Month		
9/28/2025 - 9/27/2026	12	Month		
9/28/2026 - 9/27/2027	12	Month		
6-month extension	6	Month		
Total				

4. The authority and supporting rationale and, if applicable, a demonstration of the proposed contractor's unique qualifications to provide the required supply or service.

The authority is **FAR 8.405-6(a)(1)(i)(B)** which states:

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.

FirstNet is a nationwide broadband system created under the First Responder Network Authority to provide a single interoperable platform for law enforcement, firefighters, paramedics, and other public safety officials. This is a network built explicitly for their use and not to allow interference from the public networks in times of emergency as well as provide coverage in remote rural areas of the country to ensure communication is available during times of emergency. Due to the high usage of public networks during times of emergency by civilians reacting or responding to emergencies, the network becomes too slow to allow emergency officials to effectively communicate. By creating a separate network, it creates a clear line of communication for emergency officials that only they can access during these times that allow a more effective response in emergency situations without the interference of the public while keeping the public network open for civilian communication.

The Department of Commerce awarded the National Public Safety Broadband contract to AT&T Mobility that solely has the authority to access and provide access to the FirstNet network build for first responders.

The wildland fire incident management teams are first responders to emergency situations. The unique qualities of this network have the potential to assist these emergency response teams and reach rural areas that other networks have not been able to.

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

The Contracting Officer determines that the anticipated prices(s) for the wireless services will be fair and reasonable based on current GSA Schedule pricing for FirstNet services, where GSA has

already determined the prices to be fair and reasonable. In accordance with DOI-AAAP-0024, Enhancing Competition, the Contracting Office will conduct and document thorough and detailed price analysis that includes price comparison techniques by comparing the offered price to the Independent Government Estimate, market pricing (e.g., the vendor's GSA Schedule rate, etc.), and the historical price DOI has paid for the same service.

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.

AT&T Mobility is the only vendor available to provide FirstNet services as explained above. Market research was conducted reviewing the FirstNet website and AT&T's GSA Schedule available on the GSA website, and by interviewing the AT&T representative. The required service is available on AT&T Mobility's GSA FSS contract 47QTCA19D00MV. The ultimate contract expiration date is September 26, 2039.

7. Any other facts supporting the justification.

None.

8. A statement of the actions, if any, the agency may take to remove or overcome any barriers that led to the restricted consideration before any subsequent acquisition for supplies and services is made.

At this time, AT&T Mobility is the only vendor capable of providing FirstNet Band 14 wireless service for emergency responders. Prior to any future actions, market research will be conducted to identify any other vendors or communication infrastructures capable of providing a similar service as FirstNet. Prior to option exercise under the resultant task order, the Government will conduct market research to monitor any market changes.

9. The ordering activity contracting officer's certification that the justification is accurate and complete to the best of the contracting officer's knowledge and belief.

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

[Redacted Signature] [Redacted Date]

Contracting Officer Date

10. Evidence that any supporting data that is the responsibility of technical or requirements personnel (e.g., verifying the Government's minimum needs or requirements or other rationale for limited sources) and which form a basis for the justification have been certified as complete and accurate by the technical or requirements personnel.

I certify the technical data which forms a basis for this justification is complete and accurate and meet the Government's minimum needs.

[Redacted Signature] [Redacted Date]

Contracting Officer's Representative (COR)

11. For justifications under 8.405-6(a)(1), a written determination by the approving official identifying the circumstance that applies.

FAR 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.

12. Reviews and Approvals

[Redacted Signature]

Branch Chief

Date

[Redacted Signature]

Division Chief

Date

[Redacted Signature]

Bureau Competition Advocate

Date