

**JUSTIFICATION AND APPROVAL FOR  
OTHER THAN FULL AND OPEN COMPETITION  
ONLY ONE RESPONSIBLE SOURCE**

**Document Number:** N6588615RX5A240

1. (a) Requiring Activity: Fleet Readiness Center Southeast (FRCSE)  
Naval Air Station Jacksonville  
Code: 66290  
Jacksonville, FL 32212-0016

(b) Contracting Activity: Fleet Logistics Center (FLC) Jacksonville  
Regional Contracting Department  
Jacksonville, FL 32212

**2. NATURE/DESCRIPTION OF THE ACTION BEING APPROVED:**

Award of a contract on a sole source basis for engineering and support services from Beechcraft Corp (BC) in support of T-34 and T-44 series aircraft located at FRCSE.

**3. DESCRIPTION OF SUPPLIES/SERVICES:**

The contractor shall assist the Chief of Naval Air Training (CNATRA) Fleet Support Team (FST) and FRCSE by providing sustaining engineering and technical liaison services in support of maintenance and modification of T-34 and T-44 series aircraft. Support will include nominal recurring services such as development of major alteration, repair and/or troubleshooting procedures for systems, subsystems, landing gear, avionics, wiring and other system support. The contractor shall also provide engineering support for emergent safety and fleet events such as: mishap investigations, obsolescence assistance, loads, stress, fatigue, and fracture. The Government will utilize Repair Design Office (RDO) requests to initiate all nominal recurring and emergent service requirements. The contractor shall initiate a Program Mission Office (PMO) request for every RDO request submitted by the CNATRA FST for engineering support. The PMO is for work accomplished by the contractor stress analyses department for every RDO prior to release.

When requested by the Government Technical Representative (GTR), the contractor shall provide the technical data and/or analysis report from which the contractor's decision is based. Analysis reports may include static strength analysis, fatigue strength analysis, damage tolerance analysis. On rare occasions, the fleet may experience emergency events that require immediate support from the contractor. These events include: flight safety issues, safety investigations, or emergency repair support, which could result in downing an entire fleet of aircraft, or other events deemed to be urgent and/or time critical in nature. On these occasions, the contractor shall assist the Program Office, FST, and CNATRA by providing dedicated personnel and resources to resolve the issue(s) in a timely manner. Work performed under emergency support will supersede other tasks currently in work. The contractor shall identify a central point of contact for receipt of these inquiries for the IPTs/FSTs to use to directly communicate and receive engineering and general information in regard to ordered tasks. The period of performance will be 28 September 2015 through 27 September 2020. The Government anticipates completion of 60 RDOs/PMOs, for an average of 5 per month. All work will be performed at the contractor's facility.

4. **STATUTORY AUTHORITY PERMITTING OTHER THAN FULL AND OPEN COMPETITION:** 41 U.S.C. 1901, FAR 13.501(a) – Sole source (including brand name) acquisitions under the authority of the test program for commercial items.

5. **RATIONALE JUSTIFYING USE OF CITED STATUTORY AUTHORITY:**

This requirement is currently performed under contract number N68836-12-C-0053 with BC. The contract expires 27 September 2015. Per 10 U.S.C. 2304(d)(1)(B), in the case of a follow-on contract for the continued provision of highly specialized services, such services may be deemed to be available only from the original source and may be procured through procedures other than competitive procedures when it is likely that award to a source other than the original source would result in substantial duplication of cost to the United States which is not expected to be recovered through competition; or unacceptable delays in fulfilling the agency's needs. The U.S. Navy's T-34 and T-44 aircraft were designed and built by BC. There are approximately 51 T-34 and 54 T-44 aircraft in the U.S. Navy's inventory. As the original equipment manufacturer (OEM), BC owns all of the data rights, extensive pre and post-construction design analyses, testing, and results, as well as experienced engineering manpower. Without the OEM's intellectual properties, historical information and relevant data resources, the U.S. Navy's T-34 & T-44 Trainer Fleet operations, modifications, and repair will come to a halt.

6. **DESCRIPTION OF EFFORTS MADE TO SOLICIT OFFERS FROM AS MANY POTENTIAL SOURCES AS PRACTICABLE:**

Both aircraft types are derivatives of commercially available BC aircraft models which were developed and are manufactured exclusively by BC. The Government neither participated nor funded any part of the development of these aircraft. Therefore, all data rights are proprietary and remain the property of BC. The Government is not entitled to the access of the data rights for items such as drawings, load limits, and other information particular to the design of these aircraft. Access to this information is required for the ability to perform all tasks required for this acquisition. Since BC is the exclusive owner of all of the information to complete this requirement, there are no other companies other than BC who have the knowledge and technical capability required to satisfy the agency's needs.

Naval Air Systems Command (NAVAIR) maintains in-depth knowledge of military aircraft technology developments and the military aviation industrial base. This includes insight into technologies that individual companies are focused on and their technical and production capabilities. NAVAIR conducted market research by reviewing Navy contracts for the same or similar services and found all were sole-sourced to BC. The lack of any responses to a synopsis of the planned contract published in November 2010 validates NAVAIR's determination. A sources sought notice was posted in May 2015 per FAR 6.302-1 and PGI 206.302-1 and again no responses were received.

7. **DETERMINATION OF FAIR AND REASONABLE COST:**

The Contracting Officer has determined the anticipated cost to the Government of the services covered by this J&A will be fair and reasonable.

8. **ACTIONS TO REMOVE BARRIERS TO FUTURE COMPETITION:**

For the reasons set forth in paragraph 5, FLCJ has no plan at this time to compete future contracts for the types of services covered by this document. If another potential source emerges, FLCJ will assess whether competition for future requirements is feasible.

9. **CONTRACTING ACTIVITY POINTS OF CONTACT:**

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