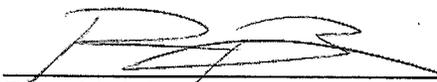
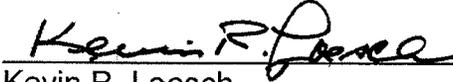
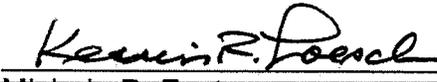


Justification For An Exception to Fair Opportunity
Coordination Matrix


Date 7/23/14 Concur/Non-Concur
Ronald J. Bakay
Competition Manager
Technology Acquisition Center (003B2)
Office of Acquisition Operations
Department of Veterans Affairs


Date 7/28/2014 Concur/Non-Concur
Kevin R. Loesch
Director, Procurement Service B
Technology Acquisition Center (003B2B)
Office of Acquisition Operations
Department of Veterans Affairs


Date 7/31/2014 Concur/Non-Concur
fo Michele R. Foster
Associate Executive Director
Technology Acquisition Center (003B2)
Office of Acquisition Operations
Department of Veterans Affairs

JUSTIFICATION
FOR AN EXCEPTION TO FAIR OPPORTUNITY

1. Contracting Activity: Department of Veterans Affairs (VA)
Office of Acquisition Operations
Technology Acquisition Center
23 Christopher Way
Eatontown, New Jersey 07724

2. Description of Action: The proposed action is for a Firm-Fixed-Price (FFP) Delivery Order (DO) issued under the National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) IV Government Wide Acquisition Contract (GWAC) for 23 brand name WildFire software licenses subscriptions. These 23 brand name license subscriptions are only valid for 1 year. The period of performance is 12 months with three 12-month option periods to be exercised at the Government's discretion. The option years will allow VA to renew the 23 license subscriptions.

3. Description of the Supplies or Services: The proposed action is for 23 brand name Palo Alto Networks WildFire software license subscriptions. The VA Network and Security Operations Center manages, protects, and monitors the cyber and security posture of VA and currently uses Palo Alto 5060 (PA-5060) devices and PA-5060 devices in a high availability pair configuration in the VA Gateways to monitor, detect, and prevent malware and vulnerabilities from accessing the VA network and crossing the gateways and firewalls. WildFire, which is utilized in the PA-5060 devices, monitors, detects, and prevents malware and vulnerabilities from accessing the VA network. It also has the ability to detect zero-day vulnerabilities and quarantine them to a virtual sandbox area for observation, which allows for vulnerability mitigation and provide the protection needed to the PA-5060 devices. The total estimated price of this proposed action is \$1,897,325.48, inclusive of option periods.

4. Statutory Authority: The statutory authority permitting an exception to fair opportunity is Section 41 U.S.C. 4106(c)(2) as implemented by the Federal Acquisition Regulation (FAR) Subpart 16.505 (b)(2)(i)(B), entitled "Only one awardee is capable of providing the supplies or services required at the level of quality required because the supplies or services ordered are unique or highly specialized."

5. Rationale Supporting Use of Authority Cited Above: This is a brand name justification in support of FAR 11.105, Items Peculiar to One Manufacturer. Based on market research, as described in paragraph eight of this document, it was determined that limited competition is viable among authorized resellers for brand name WildFire software license subscriptions. The WildFire software license subscription includes timely updates and mitigation to the malware it has identified, malware protection service, and updates to mitigate malware signatures that are delivered within 30 minutes of submission. WildFire software licenses are the only licenses that can meet all of VA's requirements. For example, WildFire is the only Commercial off the Shelf product that integrates and is compatible with the currently fielded PA-5060 next-

generation firewall devices and provides detection and prevention of modern malware. Additionally, WildFire is the only product that identifies unknown or zero-day malware by directly executing files in a virtual environment and observing malicious behavior, even if the malware has never been seen before.

Furthermore, WildFire software licenses are the only items that can provide all of VA's required functional capabilities to include native Secure Socket Layer, Transport Layer Security, and Secure Shell decryption/inspection capability to decrypt computer sessions to analyze their content, inline threat detection and blocking, inline ability to drop traffic related to discovered threats, full virtual system emulation for behavioral analysis of unknown threats, adaptable and updateable logic within virtual test system, port-agnostic inspection of well-known protocols, and detection of malware on non-standard ports and within application tunnels. Additional required capabilities that only Wildfire offers include the ability to decompress, analyze, and defend against all threats within compressed files, protect against lateral threat movement when deployed at the gateways and datacenter Wide Area Network, minimal processing overhead/impact on email delivery and other business services, natively identify infected systems by Internet Protocol address, active directory username, analysis environment that automatically scales to meet the needs of the network, implementation of no additional hardware or virtual servers by the VA, extensive integrated reporting and search functionality, and comprehensive views into internal threat databases. Finally, WildFire is the only software that can detect in real-time and is able to send the information to a virtual sandbox to allow for immediate adjudication. It is also the only software that identifies malware and can provide virtual test system, full virtual system emulation for behavioral analysis of unknown threats, and zero day vulnerabilities within its existing environment. WildFire is also the only software that is compatible and interoperable with the existing PA-5060 devices currently fielded throughout the VA enterprise. From the initial installation of the WildFire solution on May 22, 2014 through July 8, 2014, WildFire has identified 3,817 variants of malware unique to the VA environment. Failure to obtain the requested WildFire software licenses would subject the VA network and Veterans' data to possible compromise, exposure or exfiltration by extending the amount of time it takes the VA to identify and mitigate risks associated with previously unknown malware. WildFire will ensure that VA is considered fully defended and protected against cyber threats that change and emerge on a daily and hourly basis.

6. Efforts to Obtain Competition: Market research was conducted, details of which are in the market research section of this document. This effort did not yield any additional sources that can meet the Government's requirements. It was determined, however, that limited competition is viable among authorized resellers for the brand name software. In accordance with FAR 5.301 and 16.505(b)(2), this action will be synopsisized on the Federal Business Opportunities Page and the justification will be made publicly available within 14 days of award. Additionally, in accordance with FAR 16.505(a)(4)(iii)(A) this justification will be submitted to all four NASA SEWP IV GWAC groups with the Request for Quotation prior to its release in order to fully notify all interested parties.

7. Actions to Increase Competition: The Government will continue to conduct market research to ascertain if there are changes in the marketplace that would enable future actions to be fully competed.

8. Market Research: The Government's technical experts conducted market research by reviewing other similar software from June 1, 2014 through June 14, 2014. Similar software products reviewed included FireEye Platform, Sourcefire/Cisco FireAmp, Checkpoint ThreatCloud, Fortinet FortiSandbox, and Lastline. Based on review of these products, the Government's technical experts determined that none can meet all the VA functional requirements listed in Paragraph 5 of this document. Based on this market research, the Government's technical experts have determined that only WildFire software licenses can meet all of VA's needs.

9. Other Facts: Additional market research was conducted by issuing a Request for Information (RFI) on June 9, 2014 to all Groups on the NASA SEWP IV GWAC. The RFI yielded a total of three responses including one from a Group B service-disabled Veteran-owned small business Value Added Reseller (VAR) and two from VARs in Group D. All three RFI responses indicated ability to meet the Government's requirements. The market research indicates that not enough small business resellers exist to allow this requirement to be set aside exclusively for small business. The Request for Quotation will be solicited competitively among NASA SEWP IV contract vendors in Groups A through D.

10. Technical and Requirements Certification: I certify that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.

JoLynn Zimmer Kolliker

Date: 7/22/14

IT Specialist

Signature: [Handwritten Signature]

11. Fair and Reasonable Cost Determination: I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable. Contracts awarded on NASA SEWP IV contract have already been determined to be fair and reasonable. As there are three potential vendors on NASA SEWP IV GWAC, price competition is anticipated. Finally, the successful quote will be compared to the Independent Government Cost Estimate.

Carol G. Newcomb

Date: 7/22/2014

Procuring Contracting Officer

Signature: Carol G. Newcomb

12. Procuring Contracting Officer Certification: I certify that this justification is accurate and complete to the best of my knowledge and belief.

Carol G. Newcomb

Date: 7/22/2014

Procuring Contracting Officer

Signature: Carol G. Newcomb

13. Legal Sufficiency Certification: I have reviewed this justification and find it adequate to support an exception to fair opportunity and deem it legally sufficient.

Kim Sawicki

Date: 7/23/14

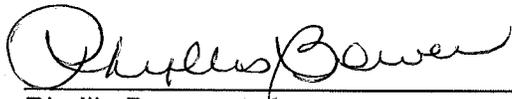
Legal Counsel

Signature: Kim Sawicki

Approval

In my role as Contracting Activity Competition Advocate, based on the foregoing justification, I hereby approve the acquisition of 23 brand name WildFire software licenses subscriptions and options for subscription renewals, pursuant to the authority cited in paragraph 4 above, subject to availability of funds, and provided that the property herein described have otherwise been authorized for acquisition.

Date: 8/13/14

Signature: 
Phyllis Bower
Head of Contracting Activity