

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, NJ 07724
2. Description of Action: The proposed action is to include brand name item descriptions in a firm-fixed-price (FFP) delivery order issued under the National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) IV Governmentwide Acquisition Contract (GWAC) to renew Entrust software subscription licenses to support an Interagency Agreement (IA) with the Department of Treasury (Treasury) to provide Public Key Infrastructure (PKI) service for VA as a Shared Service Provider (SSP). As a SSP for PKI services, VA must provide these licenses as Government Furnished Property to the Treasury's Bureau of the Public Debt (BPD). The contract period for this effort will be 24 months, inclusive of one 12-month base period and one 12-month option period.
3. Description of the Supplies or Services: VA has a requirement for renewal of brand name Entrust software subscription licenses to support PKI services. In Fiscal Year 2013, VA entered into IA VA118-13-IA-X-0017 with Treasury BPD to install, operate, and maintain a PKI Enrollment Server that would provide VA with the ability to issue web and device-based PKI and encryption certificates to the VA Enterprise. These subscriptions provide VA a limited web-based PKI administration platform for the issuance and management of certificates within the VA Enterprise. The required Entrust certificate authority administration software subscriptions include web-based capabilities for PKI auto enrollment, user management, user registration and enrollment server management.
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) 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." As required by FAR 16.505(a)(4), this brand-name justification is in accordance with FAR 16.505(b)(2)(ii)(A), (B), and (C) and is modified to show the brand-name justification.
5. Rationale Supporting Use of Authority Cited Above: This acquisition is for brand name Entrust software subscription licenses per FAR Subpart 11.105, Items Peculiar to One Manufacturer. Based on extensive market research, as described in paragraph 8 of this document, the Government has determined that there is limited competition among Entrust authorized resellers. VA has a critical need to continue the subscriptions for the current Entrust brand name licenses. Entrust brand licenses are the only licenses that the Treasury BPD uses for this effort as it is the only software licenses that are interoperable and compatible with the BPD hardware currently installed in the BPD

environment. Entrust software is required for interoperability and reliability with the current environment. VA utilizes Treasury as an SSP for its PKI services. The Treasury PKI SSP program uses Entrust software for its entire customer base, which includes VA. The current infrastructure used by the Treasury is all brand name Entrust and the VA needs to communicate with that infrastructure and can only use Entrust software due to the proprietary code that only allows Entrust PKI certificates to be issued from the Entrust software that Treasury hosts. The infrastructure for which the VA PKI resides on is a shared infrastructure with the rest of the Treasury program. Therefore, software providing similar functionality from other manufacturers would not be supported by the Treasury infrastructure.

Failure to provide brand name Entrust certificate licenses will cause PKI services in VA (email encryption/Personal Identity Verification (PIV) card issuance/Secure websites) to be unavailable because the Entrust licenses are the only brand name licenses that are interoperable with the current system. This will cause integration of other Program Management Accountability System (PMAS) deliverable items such as Personal Identity Verification (PIV) card management system (CMS) activities that support Homeland Security Presidential Directive 12 (HSPD-12) and Office of Management and Budget (OMB) mandates for PIV cards to be severely disrupted. The services that will cease to function will leave VA without a PKI provider. Failure to procure Entrust PKI software will cause systems that use security certificates and encryption to go offline, resulting in an outage that will cause access failures to VA IT systems to include medical systems, which could cause patient safety incidents. Treasury and Bureau of the Fiscal Service verified Entrust brand licenses are the only licenses that are interoperable with the existing BPD hardware and software infrastructure.

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. There is no competition anticipated for this acquisition except between Entrust resellers as discussed in paragraph 8 below. In accordance with FAR 5.301 and 16.505(b)(2), this action will be synopsisized at award on the Federal Business Opportunities Page (FBO) and the justification will be made publicly available.

7. Actions to Increase Competition: In order to remove or overcome barriers to competition in future acquisitions for this requirement, the agency will work with the program office to perform additional market research so that other solutions can be considered.

8. Market Research: Market research was conducted in October 2014 in accordance with FAR part 10. The market research conducted for this particular action consisted of surveying the commercial marketplace for similar software functionality through a review of General Services Administration (GSA) Federal Supply Schedule (FSS) 70 Contracts, Governmentwide Acquisition Contracts, Blanket Purchase Agreements against GSA Schedules, open market offerings, and NASA SEWP IV GWAC. Specifically, VA researched Verisign, Inc., Verizon Communications, Symantec Corporation, and SafeNet, Inc. as other PKI providers. It was determined that these

providers use a different PKI vendor suite that is incompatible with the Treasury's BPD infrastructure.

Additional market research was conducted in November 2014, utilizing the NASA SEWP IV GWAC Manufacturer lookup tool. Based on this research, there are multiple resellers that can provide the required licenses, therefore there is an expectation for limited competition at the reseller level.

9. Other Facts: None.