

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 for the issuance of a firm-fixed price task order under the National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) V Government-wide Acquisition Contract (GWAC) for the procurement of Tenable Network Security Center software maintenance and support.
3. Description of the Supplies or Services: VA Office of Information and Technology has a requirement to procure software maintenance and support for one (1) Tenable Network Security Center Enterprise License of Unlimited Internet Protocol (IP), four (4) Tenable Network Security Center Enterprise License of 150,000 IP Console, eight (8) Tenable Network Security Center Enterprise License of 50,000 IP addressed devices and one (1) Tenable Network Security Center Enterprise License of 500 IP addressed devices located at Sacramento, CA, Hines, IL, Cleveland, OH, Philadelphia, PA, and Martinsburg, WV. This effort is required in order to support vulnerability security scanning for the VA National Security Operations Center (NSOC) Compliance Scanning Service (CSS). Tenable Network Security Center software licenses, which are already in production, perform discovery, configuration auditing, asset profiling, sensitive data discovery and vulnerability analysis of VA's environment and provides an assessment of the agency's Information Technology (IT) security state. This capability allows VA NSOC CSS to effectively carry out its network vulnerability scanning. VA requires maintenance and support for the above mentioned software licenses in order to keep the software fully functional and operational. Maintenance support is defined as any software patch, security updates, maintenance releases and problem resolution. The period of performance for this procurement will be May 18, 2017 through May 17, 2018. The total estimated value of the proposed action is \$ [REDACTED]
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."
5. Rationale Supporting Use of Authority Cited Above: Based on market research, as described in Section 8 of this justification, it was determined that limited competition is available among authorized resellers for the required Tenable Network Security Center software maintenance and support. Tenable's Network Security Center software is a proprietary software product; therefore, no other software maintenance provider has the proprietary code to perform the necessary support services. The maintenance and support of the Tenable Network Security Center software is critical for VA NSOC CSS to

effectively carry out its network vulnerability scanning. Tenable owns the proprietary intellectual property rights to the Network Security Center software. Based on the market research conducted by the Government's technical experts, it has been determined that only Tenable or its authorized resellers have the required access to the source code and other proprietary data of the software to be able to meet the Government's needs and provide troubleshooting, updates, fixes, patches, and upgrades. The source code and proprietary data are necessary in order for the existing infrastructure and configuration to run properly. The Network Security Center software performs discovery, configuration auditing, asset profiling, sensitive data discovery and vulnerability analysis of VA's environment and provides an assessment of the agency's IT security state. With the global trending increase of IT security threats, any gap in security management efforts due to a failure to maintain the software would place VA's IT security posture and the VA Mission in an unacceptable risk state.

6. Efforts to Obtain Competition: Market research was conducted, details of which are in the market research section of this document. Limited competition is anticipated for the required brand name service. There are 61 authorized resellers of the Tenable brand name software maintenance and support on the NASA SEWP V GWAC. In accordance with FAR 5.301 and 16.505(b)(2), this action will be synopsized at award on the Federal Business Opportunities Page (FBO) and the justification will be made publicly available. Additionally, in accordance with FAR 16.505(a)(4)(iii)(A) this justification will be submitted to all applicable NASA SEWP V GWAC holders along with the Request for Quotation in order to fully notify all interested parties.

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 in a timely manner so that alternate solutions can be considered should they become available.

8. Market Research: The Government's technical experts conducted market research in October 2016 to ascertain the ability of any other source besides a Tenable authorized reseller to provide the aforementioned software maintenance and support. The research consisted of reviewing other security scanning software maintenance plans (Solar winds, Barracuda, and GFI LanGuard) offered on the NASA SEWP V GWAC. Based on these reviews, VA's technical experts could not find any other sources that could provide the aforementioned software maintenance and support without access to the proprietary technical data for the Tenable Network Security Center software. This market research is an ongoing process that started in 2010 and is continuously being conducted with research performed as recently as October 2016. Based on the market research conducted, the Government's technical experts determined that no other maintenance and support service providers (Solar winds, Barracuda, and GFI LanGuard) can meet the Government's requirements due to the need to access source code and other proprietary data of the Tenable Network Security Center software. Only Tenable or its authorized resellers have the tools and access to the source code and other proprietary data of the software to provide the necessary support. . Based on all of these market research efforts, the Government's technical experts have determined that only Tenable's brand name Network Security Center

software license maintenance can meet all of VA's needs. Additional market research was conducted in January 2017 through the use of the Provider Lookup Tool on the NASA SEWP V GWAC web site. The research shows that there are a total of 61 NASA SEWP V GWAC holders that can fulfill the Government's requirements. Out of the 61 NASA SEWP V GWAC holders identified utilizing the Provider Lookup Tool, 12 are from Group B(2), SDVOSB. A search was performed to confirm that the 12 SDVOSB concerns from Group B(2) are registered and verified in Vendor Information Pages (VIP) database (<https://www.vip.vetbiz.gov/>). The results of that search indicated that 11 of the 12 SDVOSB concerns are registered and verified in VIP. Based on the results of the market research, there is reasonable expectation that sufficient competition exists among SDVOSB concerns in Group B(2). Therefore, the request for quotation for this requirement will be submitted to Group B(2) SDVOSB GWAC holders under North American Industry Classification System code 541519.

9. Other Facts: None