

## LIMITED-SOURCES JUSTIFICATION

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 a firm-fixed price (FFP) modification to task order VA118-17-F-1850 under General Services Administration (GSA) Information Technology (IT) 70 Federal Supply Schedule (FSS) contract number GS-35F-0528P with Turning Point Global Solutions LLC (Turning Point) for Network Inventory and Optimization Solution (NiOS) software license, professional services and maintenance support.
3. Description of the Supplies or Services: The VA Office of Information and Technology (OI&T), Veterans Benefit Administration (VBA) has a requirement for a Network Inventory and Optimization Solution (NiOS) software license, professional services and maintenance support. The proposed action is to provide professional start-up services and professional support services to expand the VA Operational Support System (OSS). The contractor will ensure that the existing system is expanded to include the VBA Local Exchange Carrier (LEC) telecommunications expense and life cycle management. The Contractor will conduct configuration and functionality verification and demonstration that the VA OSS has been expanded to include the VBA LEC services for ordering, invoice auditing, and inventory management. The period of performance shall be date of award through March 31, 2018 with two subsequent 12-month option periods for software license renewal and maintenance support.
4. Authority: This acquisition is conducted under the authority of the Multiple-Award Schedule Program. The specific authority providing for a limited source award is Federal Acquisition Regulation (FAR) Part 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."
5. Rationale Supporting Use of Authority Cited Above: The proposed source for this action is Turning Point, 2273 Research Boulevard, Suite 400, Rockville, MD 20850-3285. Based on extensive market research, as described in section eight of this justification, it was determined that competition is not viable, as Turning Point is the proprietary owner and only vendor that can provide the required NiOS product and services. The procurement of the software license is required for expansion of the NiOS software to include the required VBA LEC services. The currently fielded NiOS platform is the only software that meets VA's functional requirements for a web-based customized operating platform that provides full life-cycle telecommunications management capabilities and an

integrated supply chain that connects VA with its network and telecommunications suppliers. Specifically, the software is required to provide eight modules with the following functionalities: inventory and asset management, contract administration, billing and verification and validation, dispute management, reporting, work flow processing, electronic ordering and transition support. The NiOS platform is the only software that can provide all eight of these VA functional requirements.

The inventory and asset management module is required to support multiple contracts such as telecom, wire, wireless, and local services; and shall compare inventory and billing invoices. Inventory shall be capable of being organized by contract line item number (CLIN). In addition, the software shall allow Contracting Officer Representative (COR) to make corrections to inventory and ordering items for reconciliation and have the ability to provide a consolidated inventory. The contract administration module is required so a CORCOR has the capability to assign roles for sub-users and includes a discretionary access functionality that is capable of supporting 28 quadrants of VA hierarchy code. The billing verification and validation module is required to provide electronic bill processing of carrier invoices and cost allocation to individual assets managed within NiOS. In addition, the software must be able to submit and create Agency Hierarchy Codes (AHC) via electronic interface. There are over 3000 7-level, 4-digit hierarchy codes in the system. The software shall be capable of accommodating all AHCs, including creation, disablement, and modification, as well as communicating those changes electronically to three or more different vendors. The dispute management module is required to generate and submit billing disputes to the service supplier for credit adjustment and tracking. The reporting module shall have the capability to provide reports in each of its modules and allow users the ability to generate customized ad hoc reports that include fields selected by the user for each report. The work flow processing module shall provide an activity queue for CORs to review price quotes, orders, and disputes. In addition, the software shall allow the CORs to approve activities with their queue and submit order and disputes created by other users to Enterprise Infrastructure Solutions (EIS) vendors. Moreover, the software shall support centralized, decentralized, and remote organizations and locations with an identification system that does not require any modifications or downtime for processing orders. The electronic ordering module shall have the ability to create electronic requests for quotes and must accept electronic invoices from vendors. In addition, the software shall provide the ability to convert all voice/data and other telecommunications service requests into service orders with unique purchase order number (PON) identifiers that CORs can submit to their suppliers through a variety of electronic ordering mechanisms. Finally, the transition support module provides the ability to generate transition orders and allows for the coordinated disposition of refreshed services.

The NiOS platform is required to provide uninterrupted services for Veterans through parallel operations of national data circuits impacting VA Hospitals,

benefits, and critical operations of IT and telecom services. NiOS is utilized by over 150 VA telecommunications specialists and ordering officers on a daily basis and is a critical tool to ensure local exchange carrier (LEC) services are delivered, executed, and completed within the strict Service Level Agreements defined by the Veteran Affairs (VA) National LEC contract and managed within the NiOS software. In addition, the NiOS platform allows for the continuation of essential services, including accurate tracking of cost allocation and funding for services and management reporting and billing. NiOS ensures the optimization of financial obligations utilizing best practices for management of telecommunications services. The NiOS software is the only software that meets governance obligations and enables management to control expenditures.

Only Turning Point is capable of providing the required core product software enhancements and new software versions or releases necessary to perform maintenance, as the source code required to issue the updates is proprietary. This code is also required to ensure that any services provided on the items are properly configured. Furthermore, NiOS is the only software capable of accommodating VA's anticipated annual telecommunications requirements. Therefore, there is a need to renew the NiOS licenses, for the continued use of NiOS software, and continue maintenance support services.

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. In accordance with FAR Part 8.405-6(a)(2) and FAR Part 5.301, a copy of this Limited-Sources Justification will be posted, along with a synopsis of the award notice, to the Federal Business Opportunities website within 14 days of award. In accordance with FAR 8.405-6(a)(2), this justification will be posted with the request for quotation on the GSA E-Buy website to 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 market place that would enable future actions to be competed.

8. Market Research: A Request for Information (RFI) was issued on December 7, 2016 to GSA E-Buy and National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) V Governmentwide Acquisition Contract (GWAC) websites, to ascertain if there were any other sources that could meet the Government's requirements. In each respective RFI, the Government requested that all interested vendors submit a capability statement in response to the posted draft Product Description outlining the functionalities provided by the current NiOS software. The RFIs closed on December 13, 2016; no sources responded to the RFIs. The results of the RFIs indicated that no other source, other than Turning Point, currently offers a

product with a customized operating platform that provides full life-cycle telecommunications asset management.

Additionally, VA technical representatives have conducted ongoing market research between March 2016 and January 2017 to determine whether any alternate products have come to market that would be capable of meeting VA's needs for each of the functionalities included within the eight modules discussed in section five of the justification. This included internet searches and review of specifications in trade journals for other known companies offering similar software platforms, including Network Control, Comtech Telecommunications Corp., A&T Solutions, Inc., and Telecommunications Solutions Group, Inc. The following paragraphs provide details surrounding the market research findings for each company.

Network Control offers a similar product, TEMNet software, that provides some general functions but does not offer the specific VA functionalities required for this acquisition. For example, TEMNet software's billing capability is unable to support over 3000 7-level, 4-digit hierarchy codes designed for (EIS) ordering processing and its electronic ordering capability does not have the ability to assign unique PON identifiers. TEMNet does not offer the specific functions required by work flow processing, including the ability for CORs to approve activities in their queue and it does not offer the ability to organize inventory by contract by CLIN, as required by the inventory and asset management function. Additionally, TEMNet software is geared toward supporting companies with an annual telecom expenditure of \$1 million, which is significantly less than VA's anticipated \$50 million annual telecom expenditure.

Comtech Telecommunications Corp. offers a similar product, Telecom Expense Management (TEM) software that provides some general functions but does not offer the specific VA functionalities required for this acquisition. For example, Comtech's TEM inventory and asset management function does not offer the ability to organize inventory by CLIN and it does not offer the specific functions required by work flow processing, including the ability for CORs to approve activities in their queue. Additionally, Comtech's TEM software's billing capability is unable to support over 3000 7-level, 4-digit hierarchy codes designed for (EIS) ordering processing.

A&T Solutions Inc. offers a product, Vantage Telecom Expense Management (TEM) Portal that primarily provides wireline and wireless telecom spending services; therefore lacking the full life-cycle telecommunications management capabilities required by this acquisition. In addition, the software's billing function is unable to support over 3000 7 level, 4 digit hierarchy codes designed for EIS ordering processing.

Telecommunication Solutions Group, Inc. offers a software product that provides a web based software solution with some of the required functions, including the

ability to track cost allocations as part of its billing capability, as well as the ability to provide reporting capabilities. However, telomsg.com does not offer the specific functions required by electronic ordering, such as the ability to assign unique PON identifiers. In addition, the software's contract administration function is unable to support 28 quadrants of VA hierarchy code.

Based on technical reviews of these four companies, the Government's technical experts determined that these companies do not currently offer products that can meet the Government's functionality requirements. Therefore, it was determined that no other source can provide a product with all eight required functionalities, as discussed in section five of this justification. Only Turning Point can provide the required NiOS product and services to meet VA requirements. Additionally, only Turning Point can access the proprietary source code in order to provide the required maintenance of its software.

9. Other Facts: None.