

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 a firm-fixed-price delivery order issued under the National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) V Government Wide Acquisition Contract (GWAC) for the procurement of the Pitney Bowes (PB) Spectrum enterprise software suite and associated maintenance support services.
  
3. Description of the Supplies or Services: VA Office of Information and Technology, Enterprise Services (ES), Veteran 360 (Vet360) Project Office has a requirement to acquire one PB Spectrum enterprise software suite. The enterprise wide PB Spectrum software will provide exception resolution management functionality to enable resolution to address validation failures and perform exception analysis for contact data on behalf of the enterprise. The architecture for this capability must be designed and built on the PB Code-1 Application Programming Interface (API) to ensure compatibility and integration with the VA Veterans Service Network (VETSNET) Compensation and Pension suite of applications, Benefits Gateway Services (BGS) data service platform, and Identity and Access Management (IAM) Master Veteran Index (MVI) systems. The PB Spectrum software will enable an Enterprise capability for ensuring that a quality postal address is available for the Veteran that can be provided to Veteran-facing systems and applications, such as the Enrollment system and Vets.gov that need to consume this data. This software is needed to resolve validation failures, erroneous, and/or incorrect contact data across the enterprise. The address validation information provided by this software will determine a Veteran's location (i.e., geocoding) for sending correspondence to Veterans, and ensuring that a Veteran's phone number and email address are accurate. Additionally, the software must be Code Accuracy Support System (CASS)-certified as this certification enables the U.S. Postal Services (USPS) to save time, and manpower by reducing the volume of non-deliverable mail, unsorted mail, and mail that can be delivered but not without significant effort due to incorrect mailing data. The USPS itself evaluates and certifies software and maintains a list of all the CASS-certified products on its website. VA also requires Spectrum associated maintenance support services which includes periodic patches, fixes, updates, enhancements and corrections to the software as they are offered commercially as well as technical support. The period of performance is 12 month with two (2) 12 month option periods. The total estimated value of the proposed action is [REDACTED] inclusive of options.
  
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: Based upon market research, as described in section 8 of this justification, it was determined that limited competition is viable among authorized resellers for this requirement. PB Spectrum suite is the only brand name software that is compatible with the Code-1 JAVA-based API already used by various VA projects which include VETSNET, BGS, eBenefits Portal, Stakeholder Enterprise Portal, VHA Enterprise Enrollment Services, and IAM MVI. These projects currently utilize PB software, however due to increased demands on these projects, additional software is required. The PB code-set is the only API that has gone through the rigorous testing process required before any software may be installed into VA computers and its infrastructure. Utilizing software, other than PB, would require a complete redesign and code rewrite of the current projects listed above and would require a new address validation tool along with a new exception management tool which are not interoperable with VETSNET Compensation and Pension suite of applications, BGS data service platform, IAM MVI systems. Additionally, since the Code-1 JAVA-based API is the proprietary property of Pitney Bowes Software, Inc., PB has exclusive rights to distribute the software and the ability to utilize this source code for any purposes (e.g. updates, maintenance, or bug fixes). PB resellers are the sole distributors of the compatible Spectrum suite. Based on the market research conducted by the Government’s technical experts, it has been determined that only PB or its authorized resellers have the required access to the source code and other proprietary data of the software in order to perform the services necessary to meet the Government’s needs. Furthermore, integrating multiple commercial software packages to support address validation, geocoding, and business data stewardship would result in the complete redesign of the infrastructure. The current infrastructure consists of PB brand name software and no other software is interoperable and compatible due to the aforementioned proprietary constraints. Specifically, no other software will be able to communicate with the existing PB software.

6. Efforts to Obtain Competition: Market research was conducted, details of which are in section 8 of this Justification. Limited competition is anticipated. In accordance with FAR 5.301 and 16.505(b)(2), this action will be synopsisized within 14 days of award on the Federal Business Opportunities Page (FBO) and the justification will be made publically available. In addition, in accordance with FAR 15.505(a)(4)(iii)(A), this Justification for an Exception to Fair Opportunity will be posted on the NASA SEWP V website with the solicitation.

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: In June 2017, the Government’s technical experts conducted market research to determine if there are viable sources other than PB who could provide the software licenses and maintenance needed for this requirement.

Competitors such as Oracle Customer Data Management (CDM) and IAM Master Veteran Index (MVI) Identity Management (IDM) toolkit were analyzed. Although other sources possess similar capabilities to provide the required software licenses and maintenance, only PB, or an authorized reseller has the proprietary source code necessary to provide the required licenses and perform the required services; therefore these other vendors are not able to perform the services on the proprietary software. Additionally, none of these other products can work with the existing Code-1 JAVA-based API architecture, which is critical for interoperability and interfacing with partner systems like VETSNET and BGS. PB was contacted on July 10, 2017, to inquire whether its source code was for sale. PB confirmed that the source code is proprietary and not for sale. Additional market research was conducted in June 2017 through the issuance of a Request for Information (RFI) on NASA SEWP V to identify potential sources for the required PB Spectrum software. The RFI resulted in responses from three (3) Service Disabled Veteran Owned Small Businesses (SDVOSBs), ThunderCat Technology, Four Points Technology, and Three Wire Systems. It was determined that all three (3) SDVOSBs are able to provide the required software licenses and support. On June 30, 2017, additional market research was conducted by utilizing the NASA SEWP V GWAC Provider Look-up Tool which confirmed that there are eight (8) federal registered partners for PB on the NASA SEWP V GWAC, including six (6) SDVOSBs. Based on the analysis of the responses, there is a reasonable expectation that limited competition exists on the NASA SEWP V GWAC for the required PB Spectrum software.

9. Other Facts: N/A