

JUSTIFICATION  
FOR AN EXCEPTION TO FAIR OPPORTUNITY

1. Contracting Activity: Department of Veterans Affairs (VA) because  
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-Priced delivery order, issued under the National Aeronautics and Space Administration (NASA), Solutions for Enterprise-Wide Procurement (SEWP) V, Government-Wide Acquisition Contract (GWAC) in support of Office of Information and Technology (OI&T), Information Technology Operations and Services, Infrastructure Operations (IO), Quantico Information Technology Center (QITC). This action is to purchase International Business Machines Corporation (IBM) equipment and maintenance in order to replace an existing IBM storage system that no longer has enough storage to perform server migrations that are planned for National Cemetery Administration (NCA) memorial benefits program.
3. Description of the Supplies or Services: The Department of Veterans Affairs (VA), Office of Information and Technology, Office of Information & Technology, Information Technology Operations and Services, Infrastructure Operations, Quantico Information Technology Center (QITC) has a requirement for a brand name IBM XIV Gen 3 (Model 2812-314) Storage System with 6 Terabyte (TB) drives, 9 Modules, with 267 TB usable and estimated 534 TB Compressed; and 3-year IBM hardware warranty; warranty service upgrade; perpetual software licenses; software support; hard drive retention; fiber cables; and IBM XIV implementation and migration services. This will allow the data centers to meet the Government's needs, and perform server migrations that are currently planned in order to implement the requirements for future virtual machine and data storage for the data centers in support of the NCA. The period of performance includes delivery of required hardware and software within 30 days after contract award, 60 days after contract award for delivery of IBM implementation and migration services, followed by 36 months for warranty, upgrade, hard disk retention and software support.
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 on market research, as described in section 8 of this document, it was determined that limited competition is available among authorized resellers for the required IBM hardware, software, and implementation, migration services and maintenance services. VA

requires storage hardware that is interoperable and compatible with the existing IBM P series servers. This storage upgrade will maintain interconnectivity and compatibility with existing IBM storage infrastructure at the Culpeper disaster recovery site to allow and maintain continuous Disaster recovery site data replication, recovery and backup environment. The IBM storage system upgrade includes equipment and software that are interchangeable with the existing IBM Infrastructure to ensure flexibility and redundancy when storage hardware failures occur. This IBM storage upgrade and migration will allow continuous and concurrent access and use of the existing IBM Storage Area Network (SAN) environment and Oracle real application clusters, which are all configured and used with IBM hardware. Another brand storage system would not be compatible with the IBM SAN storage at Culpeper nor would the storage components be interchangeable in cases of equipment failure, and QITC could not perform automated migrations. Any new configurations would be costly and time consuming with a potential of delaying Veteran burial service schedules. Failure to upgrade the IBM storage to increase capacity would prevent QITC from completing planned critical migrations of environments that support NCA memorial benefits.

6. Efforts to Obtain Competition: Market research was conducted from December 2016 through May 2017, 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. VA determined that limited competition is viable among authorized resellers of the required IBM brand name products and services on the NASA SEWP V GWAC. In accordance with FAR 5.301 and 16.505(b)(2)(ii)(D) notice of award for this action will be synopsized and this justification will be made publicly available on the Federal Business Opportunities Page within 14 days of award. In accordance with FAR 16.505(a)(4)(iii)(A), this Justification will be posted with the request for quotation on the NASA SEWP V GWAC website to notify interested parties.

7. Actions to Increase Competition: In order to remove or overcome barriers to competition in future acquisitions for this requirement, the Government will continue to perform market research to determine if there are products and/or source providers available that will enable future requirements to be competed.

8. Market Research: The Government's technical experts conducted market research from December 2016 through May 2017 to ascertain if the IBM brand name hardware and software being utilized in VA can be supported by other service providers. The review was conducted by industry websites and analysis of similar storage product offerings, and included a review to confirm if other similar products could be compatible with the existing infrastructure, as well as discussions with third party resellers. The similar products that were evaluated, NetApp and Dell EMC, could not interoperate with the IBM P series environment. The attempted use of any other system would cause major compatibility issues and have serious impacts on operations. Such systems would not be able to communicate with IBM systems and would require additional and costly IBM consulting and troubleshooting services, resulting in significant delays. Any other alternative would also introduce unacceptable risks to the production environment, involve several weekends of downtime due to piecemeal manual migrations, and

increase the potential of data corruption throughout the network. These risks would result in additional troubleshooting and restoration services during NCA memorial benefits production time, and would lead to delays in Veteran burial-service schedules. It was determined that the two similar products, NetApp and Dell EMC, and any other systems that cannot use IBM internal operating system interfaces, would not meet VA's functional requirements to interoperate with the existing IBM infrastructure.

Additional market research was conducted in July 2017 by utilizing the NASA SEWP V Provider Lookup Tool to determine whether brand name IBM hardware, software, and maintenance services were available from NASA SEWP V GWAC holders. It was determined that there are several resellers that hold current GWAC's; therefore, there is limited competition at the reseller level.

9. Other Facts: None