

**DEPARTMENT OF VETERANS AFFAIRS**

**Justification and Approval (J&A)  
For  
Other Than Full and Open Competition (>\$150K)**

**Acquisition Plan Action ID: VHA\_889267**

1. **Contracting Activity:** 589-17-1-6916-0001 - Department of Veterans Affairs, Service Area Office Central Region (10NA2) 708 S. 3<sup>rd</sup> street, Suite 108E, Minneapolis, MN 55415
2. **Nature and/or Description of the Action Being Processed:**  
The purpose of this justification and approval is to request a Firm Fixed Price (FFP), Requirements Contract for VISN 15 Radio and Pager Maintenance pursuant to FAR Part 6.302-1 “Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements”. At all locations with VISN 15 has a requirement for radio paging system (RPS) maintenance and follow-on services (FOS). Paging system is custom manufactured and utilizes IWA Technical Services proprietary patented R-COMM Systems software.
3. **Description of Supplies/Services Required to Meet the Agency’s Needs:** The estimated value of this requirement is \$97,000.00 per year. The period of performance is for a base year and four option years for an estimated total of \$485,000.00. VISN 15 VA Medical Center’s requirement for radio paging system (RPS) maintenance and follow-on services (FOS). Paging system is custom manufactured and utilizes IWA Technical Services proprietary patented R-COMM Systems software. The Maintenance shall be performed on all RPS Operation and Maintenance (O&M) in accordance with the RPS manufacturers Original Equipment Manufacturer (OEM) Specifications. Also included is OEM maintenance services for the existing RPS to include all hardware/software/ports provided by the RPS, or any other component to the extent that if the common equipment or any other RPS component fail, also to include to replace the failed equipment/software with new equipment/software provided by the Contractor. Services shall also include RPS security, documentation, reports, inventory control, change management, preventive maintenance and training required by VA personnel.
4. **Statutory Authority Permitting Other than Full and Open Competition:**  
  - (X) (1) Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements per FAR 6.302-1;
  - ( ) (2) Unusual and Compelling Urgency per FAR 6.302-2;
  - ( ) (3) Industrial Mobilization, Engineering, Developmental or Research Capability or Expert Services per FAR 6.302-3;
  - ( ) (4) International Agreement per FAR 6.302-4
  - ( ) (5) Authorized or Required by Statute FAR 6.302-5;
  - ( ) (6) National Security per FAR 6.302-6;
  - ( ) (7) Public Interest per FAR 6.302-7;

**5. Demonstration that the Contractor's Unique Qualifications or Nature of the Acquisition Requires the Use of the Authority Cited Above (applicability of authority):**

The government would incur substantial risk if services were procured from another source than who is required to provide maintenance and service on the paging system throughout VISN 15. Duplication of cost that is not expected to be recovered through competition, as new equipment may need to be installed and not able to interface with existing equipment.

VISN 15 paging systems is custom manufactured and utilize IWA Technical Services proprietary patented R-COMM Systems software. The RComm Model PT2020 Radio Paging Terminal is a Hardware/Software integrated system that allows the end users to input specific information into the paging system, with the expectation that the desired recipient user wearing the radio pager will be alerted to that page in a very expeditious manner. In a hospital environment, the elapsed time from when a page is initiated until the pager device is activated must be completed in under 20 seconds. It lends itself to allow anywhere from 1 to hundreds of pagers to be alerted in under 20 seconds. The current version of the PT2020 software is 5.0.3.1. The software is protected by an END USER LICENSE AGREEMENT (EULA). The hardware circuitry is not patentable, but the proprietary software and software/hardware drivers keeps others from being able to copy the code used in this system. This combination of software and hardware produce the necessary information to be transmitted from the originating party to the receiving party in a very reliable manner. There is also an option available that allows the data to be encoded and scrambled such that it cannot be intercepted by parties not having the added decryption hardware/software key in place. The entire hardware / software combination is from RComm Systems. RComm systems has chosen to keep the internal working details as proprietary to keep the possibility of a data security breach to be out of reach of others. This, coupled with the very tight VA security system, has allowed the RComm system to have never been involved with any breach of the VA sensitive data from being exposed to others outside of the VA Network.

All systems are programmed and configured specifically for each site. This equipment was designed to integrate with other systems used by the VA within VISN15, including nurse call systems, boiler and freezer alarms, panic alarms; and other special features that include low visibility handicapped veteran operator's interfaces, special Code Blue trunks, and tracing of the origin of pages within the VA network. Another feature of the RComm System is the database at one site can be remotely stored and updated at another VA facility in the same VISN. The radio paging system, as specified by IWA Technical Services, Inc. (IWATSI), is built by RComm with an exclusive marketing agreement for IWATSI to be the only authorized sales and service agent for all systems used by the US Government. The below items are not available in a standard paging system. RComm systems will continue to support and develop unique software as needed by the VA hospital system:

- RComm Systems has designed a special web page for the VA to allow employment of visually-handicapped veterans.
- RComm systems has specially designed voice prompted Code Blue systems to allow VA hospitals without a 24-hour call system in a critical situation.
- The RComm system can use the caller ID of a telephone station to initiate a page based on the location of the calling party with a specialized message per location.
- RComm systems has written a special protocol to monitor boiler alarms at some facilities.
- RComm has written special software to handle the panic alarms at some VA hospitals that are not industry standard formats.

**6. Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:**

The maintenance requirement is a purchase for maintenance on an existing radio and paging system already used at all the VISN 15 VA Medical Centers. There is no other

service available that would meet the government's requirements due to IWA Technical Services proprietary patented R-COMM Systems software. The software is protected by an END USER LICENSE AGREEMENT (EULA). The hardware circuitry is not patentable, but the proprietary software and software/hardware drivers keeps others from being able to copy the code used in this system. It would not be acceptable for the government to purchase all new radio paging system knowing the existing system is already installed and is only in need of maintenance to keep the system maintained.

**7. Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable:**

The contracting officer has determined that the anticipated cost will be fair and reasonable based on the following information: IRA has provided a list of prices that demonstrate what the commercial market would pay, therefore the Contracting Officer can compare this pricing to existing pricing for services. The Contracting Officer shall compare recently awarded contracts and other historical information prior to award.

**8. Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:**

Market research was conducted using the following research tools Vetbiz, SBA, Google, and GSA. The contracting officer found the following:

A Vetbiz search using the following key terms "811213" and "radio maintenance" "pager maintenance" "radio pager maintenance" and delivered numerous vendors who could potentially provide the above-mentioned services. VISA 15 Heartland Network facilities currently use R-Comm Model PT2020 Radio Paging terminal and there is a marketing agreement for another business (IWA Technical Service Inc. (IWATSI)) to be the only authorized sales and service agent for all systems used by the government. The software is protected by an End User License Agreement and the hardware is not patentable but the proprietary software and software/hardware drivers keeps others from being able to copy the code used in this system. This eliminates any potential data security breaches to be in reach of others. The contracting officer has determined that the search results has not provided capable companies to meet the requirement.

A search was conducted in SBA using the following key terms "811213" and "radio maintenance" "pager maintenance" "radio pager maintenance". The search yielded zero (0) potential manufacturers or distributors with the capabilities to provide/distribute coronary stent graft systems.

A Search was conducted on GSA Advantage using the key term "radio maintenance" "pager maintenance" "radio pager maintenance" which confirmed the requirement for the specific model and paging terminal is not available on GSA.

A Search was conducted in Google, which confirmed that there are business manufacturers who offer the services but none that meet the license agreement. The contracting officer searched IWATSI that is a small business showed they do provide the services.

In conclusion, a sole source is the best approach for this acquisition.

**9. Any Other Facts Supporting the Use of Other than Full and Open Competition: N/A**

**10. Listing of Sources that Expressed, in Writing, an Interest in the Acquisition: N/A**

**11. A Statement of the Actions, if any, the Agency May Take to Remove or Overcome any Barriers to Competition before Making subsequent acquisitions for the supplies or services required:**

In the event there is a need for services associated with the radio and paging system in the future, a competitive procurement will be issued on FBO.

**12. Requirements Certification:** I certify that the requirement outlined in this justification is a Bona Fide Need of the Department of Veterans Affairs and that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge and belief.

*(This signature is the requestor's supervisor, fund control point official, chief of service, someone with responsibility and accountability)*

_____	_____
Andrea Grimwood	Date
Manager, Telecommunications -Telecom Specialist, IT Operations and Services	
VISN 15 - Kansas City VA Medical Center	

**13. Approvals in accordance with the [VHAPM, Volume 6, Chapter VI: OFOC SOP](#).**

- a. **Contracting Officer or Designee's Certification (required):** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

_____	_____
Julie Willie	Date
Contracting Officer	
Service Area Office Central Region (10NA2)	

- b. **Director of Contracting /Designee (Required over\$150K but not exceeding \$700K):** I certify the justification meets requirements for other than full and open competition.

_____ (A)	_____
Scott Fiscus	Date
NCO/PCO 15 Director of Contracting or Designee	
Facility	