

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, New Jersey 07724
  
2. Description of Action: The proposed action is for the issuance of a firm-fixed price delivery order under the National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) V Governmentwide Acquisition Contract (GWAC) for the procurement of Cisco Unified Computing System (UCS) C220 M4 servers and Cisco Integrated Management Controller (IMC) licenses.
  
3. Description of the Supplies or Services: The VA Office of Information and Technology has a requirement to augment the existing Security Information and Event Management (SIEM) solution with 300 Cisco UCS C220 M4 servers and 500 Cisco IMC licenses. The 500 Cisco IMC licenses required represent 300 licenses for the servers being purchased under this procurement as well as 200 additional licenses for Cisco servers purchased in fiscal year 2016. Overall, this procurement is required to support additional security event collection, correlation and extended retention of the collected data. The SIEM solution, which is already in production, performs security event collection, aggregation, and analysis of VA's devices across the VA enterprise. The additional Cisco UCS C220 M4 servers required by this procurement will allow the processing of up to 14 terabytes of collected security data per day and prevent the premature expunging of the retained data, which will enable the VA Network Security Operations Center (NSOC) to more effectively carry out its security analysis. Delivery of the servers and licenses will be required within 30 days of delivery order award. 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 extensive market research, as described in section 8 of this document, it was determined that limited competition is available among authorized resellers for the brand name Cisco UCS C220 M4 servers and licenses. This hardware will augment existing Cisco hardware that currently comprises the VA NSOC SIEM platform; and therefore it must integrate seamlessly with the current Operation, Administration and Maintenance (OA&M) practices and procedures currently in place for that platform. OA&M practices and procedures cover aspects including hardware availability monitoring, fault management, server performance monitoring, resource availability monitoring, configuration management, and firmware management. It is critical that the SIEM platform be managed as a single platform with each server acting as a component of that system. The entire existing SIEM platform is managed by Cisco IMC, which is the management

software for Cisco C-Series servers. It is critical to be able to manage the entire platform uniformly with Cisco IMC software so that operating systems and application patches can be reliably applied across all servers to ensure consistent performance across all SIEM applications, regardless of which distributed server is being used in any given application activity. Only Cisco server equipment can be seamlessly integrated into the CIMC management platform. No other brand name server or software can meet VA's interoperability and compatibility requirements due to the proprietary constraints within the existing Cisco infrastructure. Specifically, no other brand name server or software can communicate with the existing Cisco infrastructure due to these proprietary constraints. The only way to consider another brand of equipment for this procurement while also maintaining the fundamental requirement of managing the entire platform uniformly would be to replace all of the existing SIEM equipment with equipment from the alternative brand and its associated management software. Furthermore, VA has committed to adhere to the Data Integration Layer Design and Implementation Plan specified by the Department of Homeland Security (DHS) as a part of the multi-agency Continuous Diagnostic and Mitigation and Continuous Monitoring as a Service (CDM CMaaS) project. CDM Phase 1 has been implemented by DHS using Cisco server hardware in the SIEM solution Indexer, Search Head, and Forwarder functions. The VA NSOC's SIEM platform will operate as a part of the DHS CDM project. No other vendors' hardware has been tested and specified by DHS for use in the CDM project.

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. It was determined however, that limited competition is viable among authorized resellers for this brand name requirement. In accordance with FAR 5.301 and 16.505(b) (2), this action will be synopsisized 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 provided 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 April and May 2017 to ascertain the ability of any other manufacturer being able to meet VA's requirements. The market research consisted of the evaluation of products from Cisco, Hewlett-Packard, International Business Machines, and Dell to include virtualized solutions as well as physical server-based solutions. The market research determined that only Cisco servers can satisfy VA's current requirements for the reasons described in section 5.

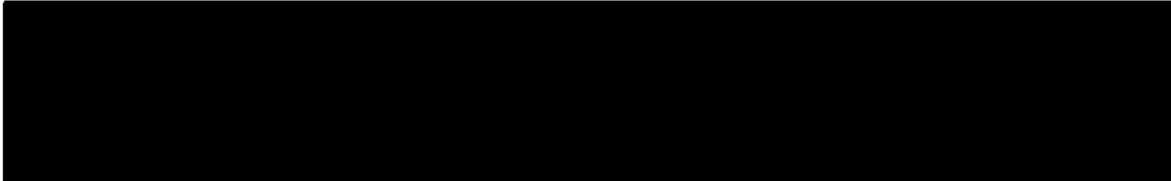
Additional market research was conducted in August 2017 by utilizing the NASA SEWP V GWAC Provider Look-up Tool to determine whether Cisco products are available from resellers that hold NASA SEWP V GWAC. It was determined that there are multiple prospective resellers of Cisco products under NASA SEWP V GWAC Group B(2), which consists of service-disabled Veteran-owned small businesses. As a result of the aforementioned market research, VA intends to issue request for quote (RFQ) VA118-17-Q-2464 via Fair Opportunity to NASA SEWP V GWAC Group B(2). NASA SEWP is a dynamic GWAC in which products can be added to vendor catalogs based on customer requests on a daily basis; so long as the required IT product is within scope of the NASA SEWP V GWAC. The requirement discussed herein has been found to be within scope of the NASA SEWP V GWAC in a separate determination.

9. Other Facts: None

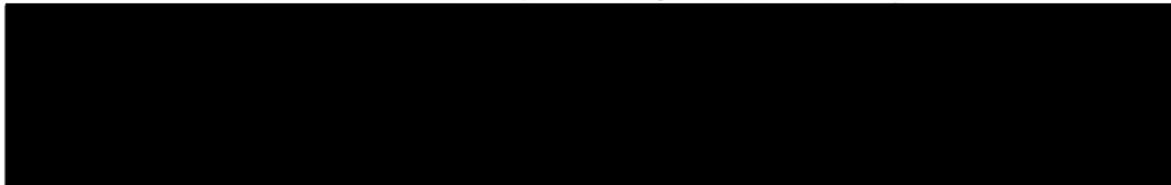
10. Technical and Requirements Certification: I certify that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.



11. Fair and Reasonable Cost Determination: I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable base on contracts awarded on NSAS SWEP V GWAC having already been determined to be fair and reasonable. Additionally, as there are multiple potential resellers on NASA SEWP V GWAC, further price competition is anticipated. Finally, the proposed price will be compare to the the Independent Government Cost Estimate.



12. Procuring Contracting Officer Certification: I certify that this justification is accurate and complete to the best of my knowledge and belief.



Approval

In my role as Advocate for Competition, based on the foregoing justification, I approve the acquisition of Cisco UCS C220 M4 servers and Cisco IMC licenses on an other than fair opportunity basis pursuant to the authority cited in paragraph 4 above, subject to availability of funds, and provided that the property herein described have otherwise been authorized for acquisition.

