

**JUSTIFICATION AND APPROVAL
FOR OTHER THAN FULL AND OPEN COMPETITION**

1. Contracting Activity: Department of Veterans Affairs
(VA) Office of Acquisition and
Logistics Center for Acquisition
Innovation-Austin 1701
Directors Boulevard, Suite 600
Austin, TX 78744

2. Description of the Action: The proposed sole source action is for a one-year firm-fixed price (FFP) effort for Synchronous Optical Network (SONET) Ring and data networking service for two (2) OC-48s for the period of 10/1/2011 through 10/30/2012. There are two accounts supporting the Austin Information Technology Center (AITC), 1615 Woodward Street, Austin, Texas. The accounts are 7100510390466 and 7100510306645. Service is currently provided by American Telephone & Telegraph (AT&T) located at 208 S. Akard Street Room 320, Dallas, TX 75202.

3. Description of Supplies or Services: The proposed action is to continue self-healing, diverse, and redundant SONET Ring and data service to provide the backbone of the AITC's wide area network. The Contractor will ensure that the system will have no more than a 50 milli-second downtime due to accidental fiber cuts or electronic component failure, guaranteeing a 99.999% uptime. AT&T is the contractor that will provide the service. This acquisition will supplement a task order that will be awarded at the same time for other circuit components of this service under General Service Administration's (GSA's) Local Service Agreement 2 (LSA 2) contract. Because the SONET ring requires OC48 circuits in order to be operational, and the circuits listed below were not included in the modification GSA executed for SONET ring service in the LSA 2 contract, a separate open-market contract must be awarded to the same contractor for an estimated price of **\$147,425.00**. This order for equipment and services is described as follows:

Item	Description	Qty/ each
1	MPEFX OC48 Multiplexing Equip Chg.	3
2	MPEFX Add/Drop Multiplexing Chg.	3
3	S25EX Loop Protection	3

4. Statutory Authority: The statutory authority permitting other than full and open competition is 41 U.S.C.253(c) (2) as implemented by the Federal Acquisition Regulation (FAR) Subpart 13.106-1 (b) entitled, "Soliciting from a single source."

5. Rationale Supporting Use of Authority Cited Above: AT&T is the incumbent local exchange carrier (ILEC) for telecommunications circuits for AITC. The vast majority of circuits that use the SONET Ring technology at the AITC are AT&T circuits including those used to operate the SONET ring. This justification only applies to

the circuit items not included in the GSA LSA 2 contract. Those items were not originally included due to an oversight by GSA when executing the modification against the LSA 2 contract. AT&T was selected as the prime vendor to provide Sonet Ring Service to the Austin AITC campus under VA's task order under LSA 2. However, AT&T would not quote these items under LSA 2, yet both AT&T and VA requirements personnel have asserted that the components are necessary for the successful operation of the Ring and are all part of the same interactive system. AT&T admittedly cannot support the service without those components described above. However, GSA policy does not allow for the items to be included in the VA task order under LSA 2. The VA must acquire those components as "open market" items to ensure continuity of SONET Ring service. Because the task order under LSA 2 will be awarded and begin performance on October 1, 2011, AITC must award this sole source task order for the remaining circuits identified above. No other carrier would be able to provide the SONET ring service within a reasonable time frame to ensure performance to begin in unison with the LSA 2 task order. Without the SONET ring, AITC would not be able to establish server connections with other VA offices in both the local area and nationally. Since AITC provides servers for critical VA communication functions, VA. The estimated price is **147,425.00**, which is below the Simplified Acquisition Threshold.

6. Efforts to Obtain Competition: Market research was conducted, details of which are in the market research section of this document.

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

8. Market Research: Market research was conducted for this requirement. This effort did not yield any additional sources that can meet the Government's requirements during the time frame required. There is no competition anticipated for this acquisition. 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.

9. Other Facts: None.

10. Listing of Sources that Expressed Interest in the Acquisition are:

Time Warner Telecom -
Nonresponsive 14405 Laurel Place,
Suite 320
Laurel, MD 20707

AT&T
208 S. Akard Street Room
320 Dallas, TX 75202