Department of the Air Force: Justification for Other Than Full and Open Competition

Dollar Value of this Acquisition: ☒ ≤ $10M ☐ > $10M and ≤ $100M ☐ > $100M and ≤ $500M ☐ > $500M

CERTIFICATIONS: CO certification serves as J&A approval ≤ $10M, *See* **J&A Template Guidance** *at https://usaf.dps.mil/sites/AFCC/AQCP/KnowledgeCenter/SitePages/DAF-Contracting-Compass/Part-6---Competition-Requirements.aspx#exceptions-to-full-and-open-competition-mandatory* J&A Template Guidance tab

Date	[redacted]	[redacted]
Date	[redacted]	[redacted]

COORDINATION

Date [redacted]	[redacted]	[redacted]
Date [redacted]	[redacted]	[redacted]
Date [redacted]	[redacted]	[redacted]
Date		Signature

APPROVALS (RFO 6.104-2(a) Table 6-1 & R-DFARS 206.104-72 Table 206.1)

Date [redacted]	Procurement Contracting Officer Jack T. McCullers, [redacted]	Signature [redacted]

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I. Agency and Contracting Activity (RFO 6.104-1(a)(1)):

Agency: Air Force Life Cycle Management Center (AFLCMC)
Contracting Activity: Intelligence, Surveillance, Reconnaissance & Special Operations Forces Directorate (WI), ISR Sensors Contracting Office (AFLCMC/WINK), Bldg. 1624, Hanscom AFB 07173-2100

II. Nature and/or description of the action being approved (RFO 6.104-1(a)(2)):

This document approves the extension of the Battlefield Airborne Communications Node (BACN) Operations, Sustainment, and Support (BOSS) Indefinite Delivery Indefinite Quantity (IDIQ) contract ordering period and Period of Performance (PoP) to Northrop Grumman Mission Systems (NGMS). This justification is made on an Individual basis.

The BACN system consists of a communications payload integrated into airframe platforms such as the E-11A. The communications payload is remotely controlled from ground stations. The ground stations are comprised of two ground support elements; a Payload Control Element-Launch (PCE-L) and a Payload Control Element- Mission (PCE-M).

Originating as a Joint Urgent Operational Need (JUON) in 2009, BACN transitioned to a Program of Record (PoR) in 2018, leading to the establishment of the 472nd Electronic Combat Squadron (ECS) at Warner-Robins AFB in 2023 to accelerate warfighter capability delivery. The current BACN Operations, Sustainment, and Support (BOSS) contract, FA8726-21-D-0001, was awarded to NGMS on a sole source basis on 21 January 2021. The BOSS contract had a [redacted] ceiling, of which approximately [redacted] has been awarded to date. The current contract had a 60-month ordering period which expired on 20 January 2026. The current Period of Performance for the IDIQ ends on 21 January 2027.

The proposed contract strategy is to extend the current BOSS IDIQ ordering period for two (2) years and the PoP for one (1) year to January 2028. As recommended by SAF/AQCK and local Hanscom policy, the ordering period and PoP for the IDIQ will end on the same date. The extension of the ordering period for two (2) years would allow a new Task Order (TO) for the operation and sustainment of the payloads and the payload control elements (PCE) to be awarded. Sustainment of the E-11A platform is currently performed by Northrop Grumman Defense Systems (NGDS) under a separate contract. The new Task Order that will employ a mix of contract types per Contract Line Item Numbers (CLINs), including Cost Reimbursement (CR), Cost Plus Fixed Fee (CPFF), and Time and Materials (T&M), to support BACN payload and PCE operations, and sustainment. The period of performance for the new Task Order will be three (3) years, one (1) 12-month base period and two (2) 12-month option periods.

The estimated total value of the next Task Order acquisition is [redacted] with a projected award date of January 2027. Per the AFLCMC/PK Competition Advocate, this J&A is [redacted] because the only changes are modifying the Base IDIQ's ordering period and period of performance. Since there is enough ceiling, this J&A allows for the extension to be used to issues as many orders up to the ceiling and/or the end of the ordering period.

The current contract is a single award IDIQ contract with a 60-month ordering period and a 72-month total PoP.
Previous Contract Number: FA8726-21-D-0001
Contractor Name: Northrop Grumman Mission Systems
Award Date: 21 January 2021
Contract Ceiling: [redacted]
Completion Date: 20 January 2026
Basis of Award: Sole Source

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III. Description of supplies/services required to meet agency needs (RFO 6.104-1(a)(3)):

The proposed extension to the current IDIQ and award of a new TO does not change the current scope of work from the original IDIQ and will continue to support 3400 Operations and Maintenance (O&M) appropriations. The equipment and services required to support the BACN PMO needs both inside the Continental United States (CONUS) and Outside the Continental United States (OCONUS) include but are not limited to:

CONUS/OCONUS Operations and Sustainment of payloads contained in or connected to the BACN System
- 24/7 payload operations
- Maintenance and support of payloads contained in or connected to the BACN System
- Support/Ancillary Equipment
- Field Service Representatives (FSRs)
- Operational Analysis
- Site Activation
- Site Moves
- Demobilization
- Home Basing Support
- Diminishing Manufacturing Sources and Material Shortages (DMSMS)
- Exercise/Exercise Support
- System Integration Laboratory (SIL)
- Equipment Inventories
- Software Upgrades/Patching/Fielding
-Training
- Ground Stations
- Ground/Airborne system checks
- Logistics
- Depot Activation Support
- Operations Transition
- Documentation
- Sustainment Operations of other systems on BACN platforms and ground stations

IV. Statutory Authority Permitting Other Than Full and Open Competition (RFO 6.104-1(a)(4)):

10 U.S.C. 3204(a)(1), Only one responsible source and no other supplies or services will satisfy agency requirements.

V. Rationale for Use of Authority (RFO 6.104-1(a)(5)):

The purpose of this proposed extension of current IDIQ and new Task Order is for the continued provision of highly specialized services by NGMS. Performance by any other source would result in (A) Substantial duplication of cost to the Government that is not expected to be recovered through competition, and (B) Unacceptable delays in fulfilling the agency's requirements.

The BACN payload was developed by NGMS in continuation of previous Northrop Grumman Independent Research and Development (IR&D) efforts, as part of the Interim Gateway Program under a multiple award IDIQ contract through the Defense Microelectronics Activity (DMEA). Task Order H94033-04-D-0005-0002 was awarded in April 2005, after “fair opportunity” was provided to the IDIQ awardees, as a proof of concept effort. Subsequent demonstrations at Joint Expeditionary Force Experiment (JEFX) in 2006 and 2008 validated BACN benefits to the

warfighter and resulted in a request for rapid transition of the capability to operational use. The proof of concept system, installed on a modified Bombardier BD-700 commercial aircraft (S/N 9001), was deployed in support of Overseas Contingency Operations (OCO) for a 6-month Operational Readiness Demonstration under the Electronic Systems Center (ESC) Contract FA8726-09-C-0002, awarded 24 October 2008. On June 24, 2009, contract FA8726-09-C-0010 was awarded to Northrop Grumman on a sole source basis to support a Combatant Commander (COCOM) JUON for an airborne gateway system citing FAR 6.302-2, Unusual and Compelling Urgency.

BACN has become a vital United States Air Force (USAF) airborne communications relay and gateway system. BACN enables real-time information to flow across the battle space within line-of-sight (LOS) and beyond-line-of-sight (BLOS). BACN provides warfighters with extended range of voice communications and tactical data networks (TDN). BACN enables voice communications interoperability between disparate radio systems (e.g. UHF, VHF, J-Voice, SATCOM, and Voice over Secure IP (VoSIP)); data interoperability across TDNs using various systems (e.g. Link-16, Situational Awareness Data Link (SADL), Enhanced Position Location Reporting System (EPLRS)) and message and network protocols (e.g. J-series (Link-16), K-series (Variable Message Format (VMF), Joint Range Extension Applications Protocol (JREAP) A, JREAP C, and Satellite TADIL-J (SAT J)); and unification of separate TDNs into one seamless network.

As of 7 April 2026, BACN airplanes have flown 18,137 combat missions and 163,690 combat flight hours. Since 2009, NGMS has evolved the BACN system and ground stations covering 24/7 operations in support of air, ground and sea-based U.S. and Coalition forces. Prior missions in the CENTCOM Area of Responsibility (AOR) continue to generated a need for BACN orbits. BACN has a proven performance record and capability to shorten the kill chain, enhance military operations, and increase the warfighter's situational awareness and communications abilities to the forward edge of the battlefield. BACN has been used continuously since it was initially fielded in December 2008. BACN currently operates in a permissive environment.

NGMS has developed several key pieces of proprietary software, including the Gateway Manager, [redacted], and the Tactical Data Link Integration Exerciser (TIGER), that are used to operate the BACN system. Currently, NGMS performs as operators of the BACN system. NGMS is an expert in the system and continues to enable the software through service pack updates. Any troubleshooting that needs to occur with the software updates is done swiftly. Another specialized service that NGMS brings to the table is their unique ability to fix problems downrange without impact to the mission. There have been instances when a launch was going to occur and a problem in the code has occurred and the NGMS operator has fixed it in real time, ensuring no impact to the mission.

Market Research that the program office conducted from June 2024 to May 2025 revealed that no other contractor possesses the comprehensive skills required to meet the stringent requirements for BACN maintenance, upgrades, and hardening while maintaining steady 24/7 operations. NGMS's unique qualifications stem from their position as the Original Equipment Manufacturer (OEM) of the BACN system with nearly 20 years of continuous involvement in its design, development, sustainment, and operations. This deep understanding of the system's architecture, code base, and operational characteristics is unmatched by any other potential vendor. One of the critical elements of NGMS's unique capability is its dedicated BACN systems integration lab (SIL). The SIL is critical to maintaining the BACN system as it houses five (5) BACN payloads as well as 15 PCEs for testing and patches prior to deployment of service packages. Replacing NGMS with another contractor at this time would be catastrophic to several ongoing efforts as well as operations. It would cause some efforts to restart completely and other necessary efforts to be canceled altogether due to funding.

The BACN Program Office has determined that award to any other source would result in substantial duplication of cost to the Government that is not expected to be recovered through competition and unacceptable delays in fulfilling the Government's requirements. The current estimate for the sole source portion of the contract is [redacted] for the base year with two (2) option years. While researching competition savings, the BACN PMO found

a study completed by the Naval Postgraduate School called "The Value of Competitive Contracting", in which the authors compared the savings that the Government could have through competition. The study found that for a services contract, like the one the BACN PMO is trying to award, the average savings would be around [redacted]. For the BACN program, that would mean a savings of [redacted] through competition. Unfortunately, if the sustainment of the BACN system was competed the program would incur a number of duplicative costs, including having another contractor pay to use NGMS software, restarting ongoing engineering efforts (RedHat update, service pack updates, etc.), training the new contractor and re-engineering the code that the system currently uses. NGMS has repeatedly declined to sell data rights to critical software, as these are typically licensed to the US government, US companies, and internationally.The duplicative software costs alone would be [redacted] based on the Independent Government Cost Estimate (IGCE) for another contractor to create or obtain software for BACN. The PMO is unsure if NGMS would be willing to work as a subcontractor for another company for this effort.

NGMS owns proprietary software that is critical to sustaining the BACN system and has consistently decline to sell or provide adequate license rights to the Government. As a result, the Government is dependent on NGMS to maintain the BACN system. While the Government has unlimited rights to [redacted], NGMS owns the Tactical Data Link Integration Exerciser (TIGER) software, which is the software that tests [redacted] when there is a service pack upgrade, security patch, software update, etc. NGMS also owns a suite of capabilities called Gateway Manager (GM). GM allows NGMS to quickly allow for any mandatory updates for continued capability in the BACN payload system. The consequence of not using NGMS would be loss of the capability suite being available to BACN as well as the program needing a new test software. While other vendors have testing software, there would need to be a large investment (in cost and schedule) to make [redacted] operate with another vendor's software. The other vendor would need to reverse engineer the current software to understand the complexities written into it and then customize parts of the [redacted] software to work with their testing software. The effort to do this would cause consequences to the BACN mission downrange because security patches and service pack upgrades would be stalled. This effort would cost the Government six (6) months to a year in schedule. The Government would have one vendor providing the security patches and service pack upgrades, while also potentially needing to have a separate contract with NGMS to perform the testing of the security patches and service pack upgrades before they could be fielded. There would also be an extended timeline to implement all of the following service packs and security patches. Currently a service pack takes 11 months between collection, development, testing, and roll-out. This schedule could be increased anywhere from a month to four (4) months depending on the new vendor and their ability to thoroughly understand the system. The program office anticipates that the rollouts would take longer then three (3) years before realized efficiencies take place. The impact of the slip in schedule due to a new vendor taking over will depend on what the update/patch is for the system. It will range from delayed capabilities for the warfighters who need the capability now to opening up potential cybersecurity vulnerabilities. Based on the substantiating items above, the BACN program requires the need to permit other than full and open competition.

VI. Integrated Market Analysis and Efforts to Solicit Competition (RFO 6.104-1(a)(6), (8), and (10)):

Originally when the program office was exploring a Contractor Logistics Support (CLS) follow-on contract, two (2) sources soughts were released to see which vendors were capable of fulfilling the requirements. The program office has since changed acquisition strategies to a proposed IDIQ extension due to the responses below not meeting the requirements. NGMS submits Subcontractor Plans as required per the DD 2579, Small Business Coordination Record, and is at the IDIQ level.

A Sources Sought Synopsis with subject “Operations, Sustainment and Maintenance of Existing Airborne Communication System” was posted to SAM.gov from November 2024 - January 2025. The Government requested

written industry statements of qualifications for companies capable of providing the specific services required to meet BACN mission performance standards. After the Government reached out to potential contractors, responses were received from the following six companies:

[redacted]

An additional Sources Sought was submitted to GSA from 23 April 2025 - 2 May 2025 to gather more details on ability to compete using pre-vetted GSA vendors which resulted in responses from the following same six (6) companies as the original Sources Sought posted to SAM.gov in Nov 2024.

Through the multiple rounds of market research, the program office determined that NGMS is the only company that has the ability to meet BACN's sustainment requirements.

A notice of proposed contract action (NOCA) was publicized with the IDIQ in Dec 2020. As there is no change to the ceiling of the IDIQ, a new NOCA is not required in accordance (IAW) with RFO Part 5. New task orders will not require posting IAW RFO 5.101(b)(1)(iv).

VII. Determination of Fair and Reasonable Cost (RFO 6.104-1(a)(7)):

The Contracting Officer is responsible for evaluating, determining, and documenting the anticipated contract cost/price is fair and reasonable in accordance with RFO Subpart 15.4, Contract Pricing.

VIII. Any Other Facts Supporting the Justification (RFO 6.104-1(a)(9)):

The April 2019 Product Support Business Case Analysis (PS-BCA) by Sawdey Solution Services recommended maintaining current Contractor Logistics Support (CLS) while transitioning to organic O-Level maintenance and operations and organic retail supply support. The goal of this strategy was to reduce risk while achieving performance benefits and cost savings. This strategy was reaffirmed in the 2024 PS-BCA which was completed by the program office. All other aspects of the program were intended to stay CLS through the life of the program.

Since February 2023, NGMS Subject Matter Experts (SMEs) have provided critical knowledge transfer at Robins AFB, facilitating the 472 ECS transition to organic maintenance and operations. The program office directed NGMS to have the blue suiters have hands on experience with the equipment while training at Robins AFB. This training has caused an increase in parts replacement. Recent requests for increased overseas operations and aircraft deployments required NGMS SME support, which has delayed the 472 ECS in meeting its Initial Operating Capability (IOC) target dates of October 2026. It is likely that the 472 ECS will not meet its Full Operating Capability (FOC) target date of October 2027. The 472 ECS has not been adequately staffed to support the needs of multiple COCOMS nor the regular tempo of CENTCOM, which leads the program to rely on the SMEs from NGMS to continue operations.

The BACN program faces persistent funding uncertainty due to evolving Air Force strategic priorities and intense competition for resources within the Future Years Defense Program (FYDP). This fiscal instability complicates long-term planning and introduces significant risk when considering a new contract. Onboarding a new industry partner in such a turbulent environment would jeopardize the relationship from the outset and inhibit programmatic agility. Extending the current IDIQ contract is the most prudent course of action, as it provides the PMO with the

contractual flexibility to execute sustainment tasks expeditiously as funds become available, or to descope efforts swiftly should divestment be required.

Furthermore, retaining NGMS as the prime contractor provides the Government with continued access to their proprietary GM software suite. This access is critical for rapid capability development and cost-effective modernization. When new requirements are funded, NGMS can leverage this existing software library to customize and deliver solutions efficiently. A new contractor would not have access to this proprietary data, resulting in significant schedule delays and increased development costs for new capabilities. This advantage is particularly crucial for addressing DMSMS issues. In a recent instance, NGMS utilized the GM suite to rapidly modify software in response to a DMSMS issue with payload operations, an action which resulted in an estimated cost avoidance of [redacted] for the Government. A new contract would forfeit this proven, cost-effective, and rapid-response capability.

IX. Actions to Overcome Barriers to Competition (RFO 6.104-1(a)(11):

In the 2019 J&A, the PMO formed an IPT to help work through the persistent data rights issue. Since then, the team has worked through the differences and dependencies of the [redacted] and GM software. The PMO also worked with the data rights attorney to send out a pre-challenge letter dated 22 April 2025 about data rights for GMX, the Airborne Executive Processor (AEP), and the Radio Interface Board (RIB). The letter resulted in the Government receiving updated assertions from the contractor stating the Government had Government Purpose Rights to all of those components of BACN, which now have converted to Unlimited Rights. The rights to these aspects of BACN are very beneficial to the Government but do not remove the barriers to competition.

Government's objective is to have trained military personnel operating and performing O-Level maintenance on the BACN payloads and ground stations. This action does not directly remove or overcome barriers to competition but does eliminate reliance on NGMS as the sole source contractor capable of nonperforming operations and O-Level maintenance. NGMS is still necessary for maintaining software and providing depot level support. The BACN system is currently the only system that meets necessary requirements to support theater airborne relay, voice bridging, and data translation operations.

The Office of the Secretary of War called for a study to determine the future of the requirement and possible replacement of BACN. While that study is in progress, the program office will continue to engage with industry to explore what possibilities exist for the program. The PMO has taken every measure to engage with industry and minimize reliance on a sole source vendor. In addition, the PMO continues to have discussions with the base data rights attorney on ways forward with a formal challenge process to ascertain if any Government funding was used in the creation or modification of GM and TIGER.