

## JUSTIFICATION REVIEW DOCUMENT

**Contracting Activity:** HQ ACC AMIC/PKB

**Program Name:** Raven Unmanned Aircraft Systems (UAS)

**Contractor:** AeroVironment, Inc.

**Size Standard:** Small Business

**Authority:** FAR 8.405-6(a)(1)(i)(B)

**Estimated Contract Cost:** ██████████

**Type J&A:** Limited Sources

ACC AMIC/DRT  
Program Manager

ACC AMIC/PKB  
Contracting Officer

ACC AMIC/PKB  
Division Chief

HQ ACC/JAQ  
Attorney/Advisor

ACC AMIC/PK  
Deputy Director of  
Contracting

ACC Director of  
Small Business

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HQ ACC/A7K  
Chief, Contracting Division

APPROVED:



**DEPARTMENT OF THE AIR FORCE**  
**Air Combat Command**  
**Acquisition Management & Integration Center**  
**LIMITED-SOURCE JUSTIFICATION**

**I. CONTRACTING ACTIVITY**

Department of the Air Force  
ACC AMIC/PKB  
11817 Canon Blvd, Ste. 306  
Newport News, VA 23606

USING ACTIVITY: Various Countries Supported by AFRICOM<sup>1</sup> pursuant of Section 1206 and 1207 of Fiscal Year 2012 National Defense Authorization Act (NDAA)

Purchase Request: TBD

Total Estimated Dollar Amount: ██████████

**II. NATURE AND/OR DESCRIPTION OF THE ACTION BEING APPROVED**

This limited sources justification is to award a Firm Fixed Price (FFP) GSA delivery order to AeroVironment, Inc., a small-business, under schedule GS-07F-0591X. The contractor shall provide the Raven Analog Unmanned Aircraft Systems (UAS), Recon, Surveillance, Target Acquisition (RSTA) kits, Initial Spare Parts, OCONUS Raven System training for up to 20 students, and Contractor Logistics Support (CLS) to the specific country identified. The CLS will be for each country for no more than a two-year period<sup>2</sup>.

**III. DESCRIPTION OF THE SUPPLIES/SERVICES REQUIRED TO MEET THE AGENCY'S NEEDS**

The Office of the Secretary of Defense (OSD) plans to build the capacity of Uganda's, Burundi's, Kenya's, as well as other African countries' national military forces to conduct counterterrorism (CT) operations, pursuant to section 1206 and 1207 of the NDAA for FY 2012 by providing the Raven UAS with supporting equipment, training, initial spares, and CLS. The training will be for a period of 20 days, to provide familiarity and understanding of the capabilities of the UAS in order to prepare the users for the maintenance and operational use of the Ravens. At the completion of training, the students will have become proficient in the operations and maintenance of the Ravens along with the understanding of the tactical and safety measures necessary to successfully deploy a Raven UAS.

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<sup>1</sup> Countries consist of Uganda, Burundi, and Kenya. At this time there are future requirements for other countries but the specific countries have not been identified.

<sup>2</sup> Section 1206 & 1207 provides the exception to the cross-fiscal year authority and provides an exception to the bona fide needs rule, which allows this requirement to be funded with FY13 funding and exceed one year as long as the funding is obligated in the current FY. For example, under Section 1206 the Period of Performance can be 1 August 2013 to 30 September 2014 and use FY13 O&M funds.

CLS support will be provided for no more than a two-year period on a Not to Exceed (NTE) Cost Reimbursement CLIN, in support of the Raven UAS systems located in the specific country. The contractor shall provide all retrograde parts, spare parts, repairables, consumables and supply support to support all field and depot level repairs plus depot level repair services to support each country's 200 missions per system per year for Raven Analog systems. CLS also includes Program/Product Management of all CLS activities, analysis and reporting of CLS activity, logistics planning for repair orders, planning of all required materiel for repair activity, property management, and coordination of shipping of all repairs and engineering support. CLS personnel shall remain in CONUS. Maintenance shall be performed by qualified maintainers using contractor-approved procedures. The contractor shall provide all tools and test equipment required to accomplish maintenance actions. The contractor shall provide transportation (shipping costs) from the applicable country to AeroVironment and from AeroVironment to applicable country for systems/components, consumables, and repairable items that require retrograde to Depot Main and material sustainment of the UAS systems and spares.

Each of the Raven systems will consist of the following:

- a) Raven Aircraft, C-Code, Analog Raven (3ea)
- b) Recon, Surveillance, and Target Acquiring (RSTA) Kit (2ea)
- c) Payload Nose Thermal IR Side Look (2ea)
- d) Payload Nose, Daylight (EO) Forward and Side Look (3ea)
- e) Softpack Case (3ea)
- f) Field Repair Kit (3ea)
- g) Ground Control Station (2ea)
- h) Shipping Case (1ea)
- i) Initial Spares Package (ISP)
  - Assy, Rechargeable Battery (10ea)
  - Assy, Universal Battery Charger (2ea)
  - Rechargeable Battery, BB-2557 (10ea)
  - Assy, Cable, Simulator Dongle (1ea)
  - Spares Package, Army Operational (1ea)
  - 50 ft. Umbilical Cable, GC2 (1ea)
  - Battery Case w/ label (2ea)
  - Packaging, Black Plastic Case (No Foam) (1ea)
  - Foam Lid for Pelican 1660 Case (1ea)
  - Foam ,4in, Pick Up And Pluck , For Pelican Case 1660 Case (2ea)
  - Envelope, Packaging, 9 x 12 in. Adhesive Backed (2ea)
  - Label, System Level Case, 8C (2ea)

**Uganda's List of Requirement:**

- 1) Eight (8) Raven Systems (see list above for breakdown)
- 2) Four (4) additional RSTA Kits for the current fleet
- 3) Operational Training for up to 20 Students
- 4) CLS for 30 September 2013 to 30 September 2014

**Kenya's List of Requirement (Optional CLIN for FY 14):**

- 1) NTE Ten (10) Raven Systems (see list above for breakdown)
- 2) Operational Training for up to 20 Students

3) CLS – Starts following the receipt of the Raven UAS and ends 30 September 2015

**Burundi’s List of Requirement (Optional CLIN for FY 14):**

- 1) NTE Ten (10) Raven Systems (see list above for breakdown)
- 2) Operational Training for up to 20 Students
- 3) CLS – Starts following the receipt of the Raven UAS and ends 30 September 2015

**Additional Country’s Requirement (Optional CLIN for FY 14):**

- 1) NTE Ten (10) Raven Systems (see list above for breakdown)
- 2) Operational Training for up to 20 Students
- 3) CLS – Starts following the receipt of the Raven UAS and ends 30 September 2015

**Additional Country Requirement (Optional CLIN for FY 14):**

- 1) NTE Ten (10) Raven Systems (see list above for breakdown)
- 2) Operational Training for up to 20 Students
- 3) CLS – Starts following the receipt of the Raven UAS and ends 30 September 2015

**CLS for Uganda FY 15 (Optional CLIN):**

- 1) CLS for 30 September 2014 to 30 September 2015

The estimated costs for the Raven Systems, training, and one year of CLS support is [REDACTED] Section 1206 and 1207 programs are funded using DoD Operations & Maintenance (O&M) Funds (see DoDI 5111.19 Section 1206 Global Train and Equip Authority & Chapter 15- Building Partner Capacity Programs- C15.1.4.9). Full funding for this requirement is being provided by Defense Security Cooperation Agency (DSCA).

**IV. AUTHORITY PERMITTING LIMITING SOURCES AND DEMONSTRATION OF THE CONTRACTOR’S UNIQUE QUALIFICATIONS TO PROVIDE THE REQUIRED SUPPLY OR SERVICE**

The source of authority permitting this acquisition is FAR 8.405-6(a)(1)(i)(B). Only one source, AeroVironment, Inc., is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized.

AeroVironment is the only manufacturer of the Raven UAS and there are no authorized distributors or resellers. Due to proprietary information, no other company could provide CLS on the Raven. If another company were to gain access to AeroVironment’s Raven, AeroVironment’s proprietary information would be in the hands of a potential competitor.

The Raven systems are currently being used by the Uganda, Kenya, and Burundi military as part of the African Union Mission to Somalia (AMISOM) in their fight against al-Shabaab, which is the Somalia based cell of the militant Islamist group al-Qaeda. The Ravens have proven to be resilient and have taken fire from Al Shabaab forces – occasionally returning to base with bullet holes. Demand for the Ravens continues due to their success. The Ugandans are also supporting the

[REDACTED]

Burundians in and around Mogadishu and the Raven has been heavily used. Intensive use has led to significant issues of wear and tear driving the need for additional Ravens. These African countries highly value the Ravens and the role they play in keeping their troops safe in the fight with al-Shabaab.

With the Raven systems currently in use, the purchase of the additional systems will allow the African countries to utilize the systems in more locations, increasing the operational effectiveness of the Ravens. Having only one type of UAS (Raven) significantly reduces operational costs to equip and maintain these assets. Additional training would be required if a different system was introduced to these countries, along with CLS support potentially being provided by multiple Vendors, complicating the CLS. An increase in spares would also be required to support the multiple systems. Additionally, by having multiple systems, it would greatly decrease the flexibility the Ugandan military would have in deploying the systems.

The Ravens currently in use fly over 200 missions a year while historically maintaining an in-commission rate of 98% or better.

**V. DETERMINATION BY THE ORDERING ACTIVITY CONTRACTING OFFICER THAT THE ORDER REPRESENTS THE BEST VALUE CONSISTENT WITH 8.404(d)**

The anticipated cost of this requirement will be considered fair and reasonable based on pricing from previously awarded contracts by the US Army and the GSA Schedule.

[REDACTED]

The current prices listed on GS-07F-0591X have been determined to be fair and reasonable by GSA for the Raven UAS and Initial Spare Parts. [REDACTED]

[REDACTED]

[REDACTED]

The historical data, comparison to the other GSA schedule holders, and the other than cost and pricing data provided will provide a great price comparison for additional assurance that the final prices are fair and reasonable.

**VI. DESCRIPTION OF THE MARKET RESEARCH CONDUCTED AMONG SCHEDULE HOLDERS AND THE RESULTS**

From 29 November 2012 to 12 February 2013, HQ ACC AMIC/PKB and ACC AMIC/DRT conducted market research and found AeroVironment, Inc., who has previously supplied Raven UASs to these countries' military, is currently the manufacturer of nearly 85 percent of the Department of Defense's small unmanned aircraft fleet. The Raven's proven technology and operation in a wartime environment is unsurpassed and AeroVironment, Inc. provides the best value to the Government.

A Request for Information (RFI) was posted to GSA eBuy with a market research questionnaire on 16 January 2013 and four responses were received, (1) AeroVironment, [REDACTED]

[REDACTED]

**VII. ANY OTHER FACTS SUPPORTING THE JUSTIFICATION**

Due to the nature of the deliverables under this requirement, the use of Raven vice any other UAS platform will ensure success through continuity of the UASs (training, operation, and maintenance). Purchasing any UAS other than the Raven, which is currently being used by these countries' military to meet their needs in their fight against al-Shabaab, will incur increased costs in terms of logistical support and training. These countries' familiarity with the Raven allows their users to conduct minor repairs to the system without using CLS. If another UAS was purchased, the learning curve would be lost and minor repairs which were once repaired by the countries' personnel would then have to be repaired by the contractor. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

If another UAS was procured for any of these countries, there would also be a need to have two separate CLS and training contracts: one with AeroVironment for the countries current fleet of Ravens and the second with the contractor providing the additional UASs. One contractor would not have the capability to work on another company's UAS due to proprietary information. In addition to two CLS and training contracts, multiple spare parts would also be required because the spare parts are not interchangeable for the different UASs. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**VIII. A STATEMENT OF THE ACTIONS, IF ANY, THE AGENCY MAY TAKE TO REMOVE OR OVERCOME ANY BARRIERS THAT LED TO RESTRICTED CONSIDERATION BEFORE ANY SUBSEQUENT ACQUISITION FOR THE SUPPLIES OR SERVICES IS MADE**

Market research is a continuous process. As new combat-tested UASs become available that meets these African Countries' needs and limitations, and the requirement for procurement presents itself, the ability to proceed with full and open competition will be carefully analyzed.

At the conclusion of CLS, if funding is available and the requirement is still necessary, a follow-on Limited Sources Justification would be required to fulfill the CLS for necessary African Countries. If the funding is not available the host country would be responsible to procure CLS, if necessary.

**IX. ORDERING ACTIVITY CONTRACTING OFFICER'S CERTIFICATION THAT THE JUSTIFICATION IS ACCURATE AND COMPLETE TO THE BEST OF THE CONTRACTING OFFICER'S KNOWLEDGE AND BELIEF**

Signature on the front page of this document signifies the technical certification that the data supporting the recommended use of this limited sources justification are accurate and complete to the best of my knowledge and belief.

**X. EVIDENCE THAT ANY SUPPORTING DATA THAT IS THE RESPONSIBILITY OF TECHNICAL OR REQUIREMENTS PERSONNEL AND WHICH FORM A BASIS FOR THE JUSTIFICATION HAVE BEEN CERTIFIED AS COMPLETE AND ACCURATE BY THE TECHNICAL OR REQUIREMENTS PERSONNEL**

Signature on the front page of this document signifies the technical certification that the data supporting the recommended use of this limited sources justification are accurate and complete to the best of my knowledge and belief.

**XI. APPROVING OFFICIAL'S DETERMINATION**

Signature on the front page of this document signifies that the circumstances under FAR 8.405-6(a)(1)(i)(B) have been met to the best of my knowledge and belief.