



National Science Foundation
2415 Eisenhower Ave • Alexandria, Virginia 22314-4684

7 January 2026

JUSTIFICATION AND APPROVAL

SUBJECT: Antarctic Support Contract NSFDACS1219442
Justification for Other Than Full and Open Competition

The purpose of this memorandum is to capture, in accordance with FAR Part 6 requirements, the circumstances and rationale supporting the use of other than full and open competition in regard to extending the period of performance of an existing contract. A justification and approval for this action is required as this period of performance extension was not incorporated into the contract at the time of award. This memorandum is a product of the known facts and circumstances during the period in which it was written.

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by the Federal Acquisition Regulation (FAR) Subpart 6.3, and consistent with the content requirements of FAR 6.303-2(b), the following facts and rationale justify the use of such authority.

6.303-2(b)(1): Agency and Contracting Activity.

The Division of Acquisition and Cooperative Support, Polar Branch, proposes to extend the term of Antarctic Support Contract (NSFDACS1219442) on behalf of the Office of Polar Programs, on a basis of other than full and open competition.

6.303-2(b)(2): Nature and/or description of the action being approved.

The intent of the National Science Foundation (NSF) is to execute a contract action which extends the contract period of performance by twelve months. The contract's current performance end date is 30 September 2026. This twelve-month extension would move end of performance to 30 September 2027. A source selection for the follow-on contract is currently underway, with the proposal receipt date already having passed. The extension accommodates both the completion of source selection and the inclusion of a transition period between the incumbent contractor and new awardee appropriate to the contract's technical complexity.

While an extension that might represent the minimum needed to complete source selection has been considered, the nature of seasonal operations in the Antarctic region makes this challenging; the bulk of contractual operations occur during the Antarctic summer (Oct-Feb), with extensive planning activity occurring during the Antarctic winter (Mar-Sep). Failure to provide a transition period that accommodates both the planning and execution phases of a performance year represents a significant risk to successful contract performance, which has implications for the security of both personnel and facilities. Opting for a minimal transition period would result in that period not covering a full performance year.

6.303-2(b)(3): A description of the supplies or services required to meet the agency's needs (including the estimated value).

Broadly, the Antarctic Support Contract (ASC) provides NSF, and by extension the scientific community and its various stakeholders, many of the necessary services to support science and

research activities in the Antarctic. The United States Antarctic Program (USAP) is the activity through which the U.S. Government expresses the national interest in Antarctica.

Managed and funded by the National Science Foundation, Office of Polar Programs (NSF/OPP), the USAP fulfills the [direction of the President](#) to maintain an "active and influential presence in Antarctica designed to support the range of U.S. Antarctic interests." The USAP includes scientific research conducted by universities and research institutions, as well as by other Federal agencies, and interacts with other international Antarctic programs in support of science. The USAP operates within the framework of the Antarctic Treaty System and U.S. implementing laws.

The USAP objectives are to expand fundamental knowledge of the region, foster research on global and regional problems of current scientific importance and use the region as a platform from which to support research that can only be done or is best done in Antarctica. The ASC is the vehicle through which many of the USAP objectives are accomplished and through which USAP's essential engineering, research, or development capabilities provided by grantees and other entities are maintained. The objective for the ASC is to provide NSF with decision support, design, planning, implementation, and operations/maintenance of research infrastructure to achieve the USAP objective and capabilities stated above. The ASC represents a comprehensive logistics contract, providing the resources necessary to sustain scientific operations in a remote environment. ASC provides extensive integration across numerous, complex mission areas ranging from flight operations to cargo movements, and includes facilities management and construction.

Performance periods under ASC run from 1 October to 30 September of a given fiscal year. The services required to meet the agency's needs consist of fulfilling the requirement for the full duration of FY26 and FY27, with FY27 capturing transition activities between the incumbent contractor and the follow-on awardee. NSF has an estimated value for this twelve-month extension at \$225M, based on prior operational years but also incorporating the transference of performance from one contractor to another.

6.302-2(b)(4) An identification of the statutory authority permitting other than full and open competition.

NSF justifies this action under [6.302-3](#) "Industrial mobilization; engineering, developmental, or research capability; or expert services".

The principal text of the authority is in 6.302-3(a)(2) [emphasis added]:

Full and open competition need not be provided for when it is necessary to award the contract to a particular source or sources in order-

- (i) To maintain a facility, producer, manufacturer, or other supplier available for furnishing supplies or services in case of a national emergency or to achieve industrial mobilization;*
- (ii) To establish or maintain an essential engineering, research, or development capability to be provided by an educational or other nonprofit institution or a federally funded research and development center; or*
- (iii) To acquire the services of an expert or neutral person for any current or anticipated litigation or dispute.*

Specifically, NSF cites the authority captured in section (ii) above. 6.302-3(b) states in the relevant part that use of the authority in 6.302-3(a)(2)(ii) may be appropriate under the following conditions [emphasis added]:

- (i) Establish or maintain an essential capability for theoretical analyses, exploratory studies, or experiments in any field of science or technology;*

(ii) Establish or maintain an essential capability for engineering or developmental work calling for the practical application of investigative findings and theories of a scientific or technical nature; or
(iii) Contract for supplies or services as are necessary incident to paragraph (b)(2)(i) or (ii) of this section.

As established in the discussion on the description of supplies and services being provided, the ASC provides a range of necessary supplies and services required to occupy three U.S. stations year-round and execute or maintain scientific operations in the Antarctic region. Without the logistical, communications, facilities, infrastructure, transportation, and science equipment support provided by the ASC, occupation of the stations and execution of research in Antarctica would not be possible. Thus, the ASC represents a contract which is a “necessary incident” to “maintain an essential capability for [...] exploratory studies, or experiments in any field of science or technology”.

The ASC represents a critical component of successfully executing the USAP mission, which is a presidential mandate to NSF. NSF, through USAP, is tasked with maintaining an active and influential presence in Antarctica on behalf of the United States. USAP’s execution of science and engineering activities in the Antarctic region is how the US maintains an active, influential presence. This is in addition to the scientific and engineering merit these activities may carry, some of which cannot be reasonably executed outside the region.

6.302-3(b)(5) A demonstration that the proposed contractor’s unique qualifications or the nature of the acquisition requires use of the authority cited.

The follow-on contract will not be ready to award such that a transition period which accommodates a safe transition period of at least twelve months can be accomplished by the current performance end date in September 2026. NSF considers a shorter transition period to create undue risk to human health and safety and the scientific and engineering mission.

A competed, limited-scope contract or ‘bridge contract’ is not considered viable. NSF does not contest that logistic support services for base operations, even for those in remote locations, exist in the commercial market. Nor does it contest that commercial solutions are available for scientific operations support, remote communications, air transportation, sea transportation, facility maintenance and construction, emergency and conventional medical services, among other services, exist.

However, NSF’s requirement is that a vendor be capable of immediately launching into the integration of all these highly specialized services and be willing to do so for a period not exceeding twelve months, in a way that does not cause undue risk of harm to the personnel affected by these life-supporting services and/or that otherwise continues to maintain the essential capabilities at issue. NSF is not aware of another method, vendor, or opportunity capable of fulfilling this need beyond extending the current contract with the current contractor. While there are other commercial vendors conducting operations on continent for other national programs, none of those operations are of the scale and complexity of the U.S. program.

A significant challenge to fulfilling the requirement for a relatively short duration is successful hiring of the necessary seasonal workforce. Seasonal workers, used to fulfill positions during Antarctic summer, number in the hundreds. Credible risk exists that a bridge contract would harm workforce continuity, increasing risk of operational failure and, most importantly, unacceptable and significant risk to personnel safety if disruptions occur to medical, firefighting, and runway operations staffing.

Piecemeal acquisition of the above services for a one-year period, and having NSF operate as the integrator, is also not considered a viable method of maintaining the essential capabilities. Considering that the current management scheme has been in effect since before 2011 (current

contract award), this would constitute a drastic change in the organization of the cognizant program, a change which could not be accomplished in the period of time provided.

6.303-2(b)(6) A description of efforts made to ensure that offers are solicited from as many potential sources as is practicable, including whether a notice was or will be publicized as required by subpart 5.2 and, if not, which exception under 5.202 applies.

This contract action, an extension, will not be subject to competition. This extension accommodates an extended transition period, which is intended to decrease risk for both NSF and follow-on awardee.

NSF will adhere to the publication requirements under FAR [6.305](#). See also FAR 6.302-3(c). This action will not be synopsisized in accordance with exception [5.202\(a\)\(10\)](#). Under this exception, synopsis is not necessary when the action is made under the conditions described in 6.302-3, the authority cited for this justification and approval.

6.303-2(b)(7) A determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable.

The Contracting Officer's signature on this document indicates that the Contracting Officer has determined that the anticipated cost to the government will be fair and reasonable. The Contractor shall be required to submit a proposal to be evaluated and negotiated by the Government. Prior to execution of the contractual extension, a proposal analysis will be performed. The proposal analysis will ensure that the final agreed-to price for the contract action is fair and reasonable.

By exercising an extension, versus award to a new vendor for the same period, NSF hopes to have continuity in cost escalation between performance periods, as the incumbent vendor will be able to leverage existing subcontracts and arrangements, thereby avoiding potential 'start-up' costs another offeror could reasonably expect. The exercise of the full length of the extension also allows the incumbent contractor to better prepare for the FY27 performance period, allowing continuity into the transition period from which the follow-on awardee can utilize or otherwise benefit from.

6.303-2(b)(8) A description of the market research conducted (see part 10) and the results or a statement of the reason market research was not conducted.

Specific market research has not been conducted for this contract action. FAR Part 6 contemplates the application of market research in the context of a new contract award, which is not the subject of this justification. However, market research for the follow-on has informed NSF's assessment of available options; it has highlighted that the complexity of the requirement makes it likely that groups of vendors – each with specific capabilities – are likely to enter into teaming arrangements to satisfy the whole of the requirement. The establishment and commitment of teaming arrangements presents a challenge for responding to quick-turn notices and requirements.

6.303-2(b)(9) Any other facts supporting the use of other than full and open competition[.]

NSF has not identified any other facts supporting the use of other than full and open competition beyond those identified elsewhere in this justification.

6.303-2(b)(10) A listing of the sources, if any, that expressed, in writing, an interest in the acquisition.

No sources have expressed an interest in providing services for the intended duration, which is a contract action that is distinct from the ongoing follow-on contract source selection.

6.303-2(b)(11) A statement of the actions, if any, the agency may take to remove or overcome any barriers to competition before any subsequent acquisition for the supplies or services required.

Given the complexity and duration of the requirement, it behooves NSF to maximize the competition available, such that NSF has the highest confidence possible that successful performance will be maintained through the lifespan of the contract. This extension is meant to ensure both the successful source selection for the competitive follow-on, and ensure that neither NSF or the awardee suffer outsized risk due to diminished transition windows.

6.303-2(b)(12) Contracting officer certification that the justification is accurate and complete to the best of the contracting officer's knowledge and belief.

This justification is accurate and complete to the best of the undersigned contracting officer's knowledge.

See Next Page for Certifications and Signatures

Certifications & Signatures

Contractor Officer Certification; per FAR 6.303-2(b)(12): The contracting officer must certify that the justification is accurate and complete to the best of the contracting officer's knowledge and belief.

In accordance with 6.303-2(b)(12), the undersigned contracting officer does certify that this justification is accurate and complete to the best of their knowledge and belief.

William Engelhart
Contracting Officer
Division of Acquisition and Cooperative Support

Date

Technical Certification; per FAR 6.303-2(c): Each justification shall include evidence that any supporting data that is the responsibility of technical or requirements personnel (e.g., verifying the Government's minimum needs or schedule requirements or other rationale for other than full and open competition) and which form a basis for the justification have been certified as complete and accurate by the technical or requirements personnel.

In accordance with 6.303-2(c), the undersigned technical representative does certify that determinations that the services are "essential" are within the meaning of the cited authority, and that discussions of schedule and technical requirements are complete and accurate.

Stephanie Short
Section Head
Antarctic Infrastructure & Logistics

Date

Approving Authority; per FAR 6.304(a)(4): Justification for other than full and open competition shall be approved in writing by the senior procurement executive of the agency designated pursuant to 41 U.S.C. 1702(c) in accordance with agency procedures for a proposed contract over \$75 million or, for DoD, NASA, and the Coast Guard, over \$100 million.

In accordance with 6.304, the below signature constitutes approval by the National Science Foundation's Senior Procurement Executive.

Patrick Breen
Senior Procurement Executive
National Science Foundation

Date