

JUSTIFICATION REVIEW DOCUMENT

Control Number: HQC007-13-10  
Purchase Request: HQCAAA-2341-2100-000

**Description of Acquisition:** Purchase additional Protegrity Defiance Security Manger software licenses and Gold maintenance support under existing GSA delivery order.

**Statutory Authority:** 10 U.S.C. 2304(c)(1), FAR part 8.405-6(b)(1), Limited Sources Justification, only one source and no other supplies or services will satisfy agency requirements.

Prepared by: Jason Nuckols [Signature]

Contract Specialist  
Date: 01/23/2013

Technical: Lannie Gardner/Willie Watkins [Signature] / [Signature]  
Guard/Reserve  
Component

IT Specialist  
Date: 1/23/13 / 1/28/13

BEIMG: Debbie Emory [Signature]

Lead IT Specialist  
Date: 1/23/13

PCO: Rita W. Jackson [Signature]  
PHONE: (804) 734-8000 Ext: 48199

Contracting Officer  
Date: Jan 28, 2013

**Reviews:** We have reviewed this Limited Source Justification (LSJ) and find that justification is adequate to support other than full and open competition.

IT Specialist: Lannie Gardner

Signature: [Signature] Date: 1/23/13

Guard/Reserve  
Component Willie Watkins

Signature: [Signature] Date: 1/28/13

Legal Counsel: Elliot J Clark  
(Printed Name)

Signature: [Signature] Date: Jan 29, 2013

Division Chief: D.L. Wiggins

Signature: [Signature] Date: 01/31/2013

Competition  
Advocate Melissa Rios

Signature: [Signature] Date: 1/31/13



**Department of Defense**  
**Defense Commissary Agency**

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**Limited Source Justification**  
**(Reference FAR 8.405-6)**

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**General Services Administration Federal Supply Schedule**

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This acquisition is being conducted under the authority of Section 201 of the Federal Property and Administrative Services Act of 1949 (40 U.S.C.501) Multiple Award Schedule Program FAR 8.401 and is justified by the following facts and rationale required under FAR 8.405-6 (a)(i)B, Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are proprietary in nature:

**(1) Agency and Contracting Activity**

Defense Commissary Agency  
1300 E Avenue  
Fort Lee, VA 23801-1800

Requiring Activity: Information Technology Directorate (LEIT) Technology Enhancement Division, Data Center (LEITC)

Contracting Activity: Store Services Support Division, IT Procurement Branch (LEASI)

The Defense Commissary Agency (DeCA), Store Services Support Division, Information Technology Branch, proposes to enter into a contract on the basis of other than full and open competition.

**(2) Nature and/or description of the action being approved.**

DeCA has a requirement on a limited source basis to procure additional Protegrity Defiance Security Manager Software licenses and maintenance support for its Guard and Reserve Component, Payment Card Industry (PCI) environments, located at its headquarters, Fort Lee, Virginia. Additional licensing will accommodate the agency as follows:

- Security coverage of Guard & Reserve PCI

Proposed Contractor: Computer Marketing Associates, Inc. (CMA)  
1861 International Drive, Suite 280  
Tysons Corner, VA 22102-4412  
POC: Cathy Crick (703) 917-7725  
GSA # GS-35F-0550U



**(3) Description of Supplies/Services:** Purchase additional Protegrity Defiance Security Manger software licenses under the existing GSA delivery order as noted below.

<b>Protegrity Data Security Management Solution Licenses and Maintenance</b>			
<b>Item #</b>	<b>Description</b>	<b>QTY</b>	<b>Type</b>
1	Protegrity File Protector (Open Systems) - One Server	1	New
2	Protegrity Oracle Database Protector (Open Systems) Non-Production - One Server	2	New
3	Gold Support for Protegrity File Protector (Open Systems) - One Server	1	New
4	Gold Support for Protegrity Oracle Database Protector (Open Systems) Non-Production - One Server	2	New
5	Professional Services to cover implementation for Oracle Database	1	New
6	Training	1	New

**(4) Identification of the justification and the rationale.**

In accordance with FAR 8.405-6(b)(1), the circumstances restricting competition for this acquisition is DeCA currently has a delivery order in place with CMA for the Protegrity Defiance Security Manager Software and maintenance support and it is currently being widely utilized within the agencies enterprise data warehouse (EDW) which houses DeCA's sales, pricing and product data. The cost to add licenses for Oracle Data Protector to support PCI was deemed the most cost effective.

Due to emerging security requirements regarding the protection of data-at-rest and mandates from the PCI, Sarbanes Oxley, Department of Defense (DoD) and DeCA's Information Assurance (IA) office, DeCA is required to implement and sustain a data security management solution.

This software is a high-performance enterprise level solution that protects sensitive data from internal and external threats. It also provides security administration the ability to centrally define, distribute, monitor and enforce security policy independent from database administration, in response to the PCI/IA separation of duties finding. In addition, a full range of audit logs and reports are available to provide awareness of regulatory conformity as it relates to sensitive data and IA compliance.

Adding licenses to incorporate PCI data security will dissipate the vulnerability in the Agency's PCI/IA audit for Guard and Reserve. If a viable solution is not put in place, the agency may require recertification at an expense more than the cost of the additional licenses needed to secure the PCI environment.

Additionally, this requirement is to add Oracle Data Protector to an existing site license agreement for DeCA's Protegrity Defiance Security Manager Software to support/ensure compliance of PCI data maintained for DeCA's Guard and Reserve sales activities.

Teredata is the only authorized distributor for Protegrity licensing and support and the current contractor, CMA, is the only authorized reseller. Additionally, CMA is the only GSA reseller for this licensing and support. Due to the proprietary nature of the software the only other company authorized to resell the products and support is the manufacturer, Protegrity, Inc. who does not currently have a GSA schedule. The only other alternative would have been to resolicit the requirement on the open market which would further delay meeting PCI compliance. This delay could potentially shut down the agency's Guard and Reserve sales to our military patrons.

**(5) Determination by the ordering activity Contracting Officer that the anticipated order represents the best value consistent with 8.404(d).**

In accordance with FAR 8.404, 12.209, 13.106-1(2), and 14.408-2, I hereby determine that the anticipated cost or price to the Government for this contract action will be fair and reasonable. The price reasonableness memorandum detailing the fair and reasonable price determination will be included in the contract file documentation. Additionally, the contractor is proposing a significant reduction/discount off of their established GSA schedule pricing.

**(6) Market Research.**

DeCA conducted market research and actively sought an alternative solution to ensure adequate competition was considered for this acquisition. The alternate solution would have cost the agency 65% more than the proposed solution identified above. An interchange with other vendor applications being utilized within the Agency was considered as an alternative solution for PCI compliance for Guard and Reserve; however, Protegrity Defiance Security Manager Software and maintenance support was deemed to be the most advantageous to the Government.

**(7) Any other facts supporting the justification.**

As DeCA currently utilizes this solution, the benefits to be derived would allow the agency more manageability by keeping all PCI/personal identifiable information (PII) protection requirements under one umbrella application. It will allow the agency to manage and/or minimize costs by maintaining only one application versus having to maintain multiple applications.

**(8) A statement of actions, if any, the agency may take to remove or overcome any barriers that preclude the agency from meeting the requirements of 8.405-1 and 8.405-2 before any subsequent acquisition for the supplies or services is made.**

In an effort to prevent having to replace major portions of its enterprise architecture, the government's only option is to seek cost reductions by negotiating prices below the schedule holder's published price lists to ensure that it is always obtaining the best possible pricing. Additionally, the manufacturer is working on obtaining their own GSA schedule which would provide additional competition for any follow-on action.



**(9) Contracting Officer's Certification.**

In accordance with FAR 8.405 (f) and 8.401, authority of multiple award schedule program, I certify that the data supporting the recommended use of other than full and open competition is accurate and complete to the best of my knowledge and belief.

Rita W. Jackson  
Contracting Officer

Jan 23, 2013  
Date

**(10) TECHNICAL CERTIFICATION:** "I certify that the supporting data under my cognizance which are included in the J&A are accurate and complete to the best of my knowledge and belief."

NAME: Lannie Gardner

SIGNATURE: Lannie Gardner

TITLE: Program Manager

DATE: Jan 23, 2013

CONTRACTING OFFICER CERTIFICATION: I have reviewed this justification and find it to be accurate and complete to the best of my knowledge and belief. Since this justification does not exceed \$650,000 and pursuant to the authority of 10 U.S.C. 2304(c)(1) provided that funds are available or will be made available and provided that the services and/or supplies herein described have otherwise been authorized for acquisition, this review serves as approval."

NAME: Rita W. Jackson

SIGNATURE: Rita W. Jackson

TITLE: Chief, IT Procurement Branch/  
Contracting Officer

DATE: Jan 28, 2013

ALL QUESTIONS REGARDING THIS LIMITED SOURCES JUSTIFICATION ARE TO BE REFERRED TO THE CONTRACTING OFFICER Rita W. Jackson (804) 734-8000 x48199