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Decision

Matter of: Amentum Parsons Logistics Services LLC

File: B-417506.15

Date: February 4, 2026

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DIGEST

Protest of agency's noncompetitive modification of a task order to add optional periods of performance is denied where the agency reasonably relied upon the logical follow-on exception to fair opportunity requirements of Federal Acquisition Regulation section 16.505(b)(2)(i)(C).

DECISION

Amentum Parsons Logistics Services LLC, of Arlington, Virginia, protests the decision of the Department of the Army, Army Contracting Command--Rock Island, to add optional years of performance to task order No. W52P1J19F0394, issued by the agency to KBR Services, LLC, of Houston Texas, for support services for the U.S. European Command (EUCOM). The protester alleges that the agency has not properly justified procuring these services on a sole-source basis.

We deny the protest.

BACKGROUND

Logistics Civil Augmentation Program

The Logistics Civil Augmentation Program (LOGCAP) is a U.S. Army comprehensive strategic sourcing indefinite-delivery, indefinite-quantity (IDIQ) contracting vehicle that

provides base operations support and sustainment services to U.S. Geographic Combatant Commands and Army Service Component Commands around the globe. Contracting Officer's Statement and Memorandum of Law (COS/MOL) at 2. LOGCAP is currently in its fifth generation, referred to as LOGCAP V. *Id.*

In April 2019, the agency awarded LOGCAP V IDIQ contracts to four contractors, including KBR Services and the protester, each having an initial ordering period of five years and five 1-year options. *Id.* at 3. Concurrently with those awards, the agency issued two types of task orders under the awarded contracts, known as set-the-theater (STT) task orders and performance task orders (PTO), in support of each of seven U.S. combatant commands and military operations as follows: Northern Command (NORTHCOM); Southern Command (SOUTHCOM); EUCOM; Africa Command (AFRICOM); U.S. Central Command (CENTCOM); Indo-Pacific Command (INDOPACOM); and Afghanistan. *Id.* The STT task orders included a base year of performance and nine 1-year options. *Id.* The PTOs, which constituted the larger component of the issued task orders, included a base year of performance and four 1-year options. *Id.*; see also *AECOM Mgmt. Servs., Inc.--Advisory Op.*, B-417506.12, Sept. 18, 2019, 2019 CPD ¶ 342 at 2-3 (discussing LOGCAP V task order structure). The periods of performance of the STT task orders run roughly from April 2019 to various points in 2029 and 2030. COS/MOL at 3. The periods of performance of the PTOs run roughly from as early as March of 2020 to various points in 2025 to 2028. *Id.* The agency intended to re-compete the issued PTOs at the end of their 5-year periods of performance, as well as to issue additional PTOs as the need arose. *Id.*

When KBR Services and the protester were awarded their LOGCAP V IDIQ contracts, they also received STT task orders and PTOs. *Id.* KBR Services received STT task orders and PTOs for EUCOM, NORTHCOM, and Afghanistan. *Id.* The protester received an STT task order and a PTO for SOUTHCOM. *Id.* At issue here is the agency's intended action with respect to KBR Services' EUCOM PTO.

Army Pre-positioned Stock Programs

Also relevant here are the agency's Army Pre-positioned Stock (APS) programs, pursuant to which vehicles and equipment are pre-positioned in five areas of the world to equip Army regionally-aligned forces when they rotate into theater for training, disaster relief, theater security, or contingency operations. *Id.* Four of the APS mission areas are aligned with one of the U.S. combatant commands: APS-1 is aligned with NORTHCOM; APS-2 with EUCOM; APS-4¹ with INDOPACOM; and APS-5 with CENTCOM. *Id.* at 4. APS-3, which does not align with a specific combatant command, consists of equipment stored on ships. *Id.* The agency initially procured APS support

¹ APS-4 also includes APS-4WC, which consists of a fleet of Army-owned watercraft located at Yokohama North Dock, Japan, that provides support to various missions ranging from harbor operations to cargo movement across open water. COS/MOL at 4 n.7.

under the Enhanced Army Global Logistics Enterprise (EAGLE) basic ordering agreement. *Id.* at 3-4.

In August 2022, the agency decided to move APS requirements from EAGLE to LOGCAP V. *Id.* at 4. On May 5, 2023, the agency issued a solicitation to the four LOGCAP V contractors, pursuant to which the agency would issue task orders for the APS requirements. *Id.* After evaluating proposals, on June 14, 2024, the agency issued task orders to KBR Services for APS-2 and to the protester for APS-3, APS-4, and APS-5. *Id.*

Section 113 Report to Congress

As discussed above, the agency intended to recompete the LOGCAP V PTOs at the conclusion of their 5-year periods of performance, a procurement effort the agency referred to as LOGCAP V.V. On December 22, 2023, President Biden signed into law the National Defense Authorization Act for Fiscal Year 2024 (2024 NDAA), which included a provision directing the agency to “conduct a review of the proposed recompete of the operational task orders of the geographic combatant commands under the LOGCAP V contract.” 2024 NDAA, Pub. L. No. 118-31, div. A, title I, subtitle B, § 113(a), 137 Stat. 136, 167 (2024); hereinafter (Section 113 Report). Among the elements to be included in the review was “[a]n analysis of recompeting the [LOGCAP V PTOs] compared to transitioning directly to the LOGCAP VI contract instead of recompeting such task orders.” *Id.* § 113(b)(5). The “LOGCAP VI contract” referenced in the 2024 NDAA is “a successor contract for the logistics augmentation program of the Army that is expected to be entered into following the expiration of the LOGCAP V contract.” *Id.* § 113(d)(2). The agency was to provide a report on the results of its review to Congress not later than 90 days after enactment of the 2024 NDAA. *Id.* § 113(c).

On July 24, 2024, the agency submitted its report to Congress. *See generally* Agency Report (AR), Tab 9, Section 113 Report. The report discussed eight elements required by the 2024 NDAA, including stakeholder input, cost estimates and timelines, and an analysis comparing proceeding with the LOGCAP V.V procurement--referred to as course of action (COA) 1--with transitioning directly to LOGCAP VI and instead issuing PTOs under that new IDIQ vehicle--referred to as COA 2. *Id.* With respect to both COA 1 and COA 2, the Section 113 Report contemplated completing issuance of the APS task orders discussed above prior to commencing the next procurement. *See id.*, encl. 4, COA Timelines. Under COA 1, the next procurement was LOGCAP V.V., pursuant to which the agency would issue new PTOs and begin transition of performance prior to then commencing the LOGCAP VI procurement. *See id.*, encl. 4, COA Timelines at 1. Under COA 2, the agency would not perform the LOGCAP V.V procurement and instead would commence the LOGCAP VI procurement shortly after issuance of the APS task orders, such that the agency would begin and complete the LOGCAP VI procurement substantially earlier than under COA 1. *See id.*, encl. 4, COA Timelines at 2.

As discussed in the Section 113 Report, input from combatant commands, service component commands, and other commands largely revealed a preference for COA 1. *Id.* at 9-10. The agency noted that it intended to incorporate new technology concepts under both COAs, and also discussed further innovations it intended to incorporate under LOGCAP VI, including the implementation of a web-based rapid requirements development and cost estimating tool, as well as flexible contracting structures not currently available under LOGCAP V, such as leader company contracting pursuant to Federal Acquisition Regulation (FAR) subpart 17.4² and multi-sourcing to create a continuous competitive environment and provide viable backup resources. *Id.* at 17-19. The agency also considered the resourcing implications of each COA, stating on the one hand that COA 1 “will require significantly less effort for the acquisition team than accelerating the LOGCAP VI contract competition[.]” *id.* at 22, and on the other that COA 2 “creates the lowest workload burden on the acquisition team between now and 2030[.]” *id.* at 21.

The Section 113 Report discussed the cost benefits of competition under both COAs, noting that the agency had noncompetitively added requirements under the existing PTOs using undefinitized contract actions (UCA), and that the competition of those added requirements under either COA “will create opportunity for competitive pressure that can result in cost savings to the requiring activities.” *Id.* at 20, 21. The report noted, however, that unlike COA 1, the cost savings under COA 2 were likely to accrue “within the next three to four years[.]” as a result of the differing timelines associated with each COA, which are discussed more fully below. *Id.* at 21.

In comparing the two COAs, the agency noted that under COA 2, proceeding directly to LOGCAP VI rather than recompeting the PTOs under LOGCAP V also would entail extending the PTOs on a sole-source basis. *Id.* at 15. This was because the remaining performance periods for the existing PTOs were not sufficient to complete transition to the LOGCAP VI IDIQ contracts and new PTOs issued under them. *Id.* Additionally, the agency noted that the LOGCAP VI contract awards, unlike task orders issued through the LOGCAP V.V competition, would be subject to protest through the federal court system. *Id.* Based on experience with previous LOGCAP procurements, the agency expected such protests to occur, and that such protests could “delay start of performance approximately two to three years on average.” *Id.*

Considering the eight elements required by the 2024 NDAA, the agency concluded that under COA 1, “the benefits of continuing with the planned recompetes of the operational task orders of the geographic combatant commands under the LOGCAP V contract outweigh the possible benefits and the high degree of uncertainty and risks associated with moving directly to the LOGCAP VI contract.” *Id.* at 7.

² When using this acquisition technique, “[a] developer or sole producer of a product or system is designated . . . to be the leader company, and to furnish assistance and know-how under an approved contract to one or more designated follower companies, so they can become a source of supply.” FAR 17.401.

APS Task Order Protests

On June 26, 2024, approximately a month before the agency submitted the Section 113 Report to Congress, several contractors filed protests with GAO challenging the June 14 issuance of the APS task orders that had been competed under LOGCAP V. COS/MOL at 4. On October 4, just over two months after the agency submitted the Section 113 Report, our Office issued decisions sustaining the protests challenging the issuance of task orders for APS-3, APS-4, and APS-5, recommending in each decision that the agency reevaluate proposals consistent with the solicitation and the decision, to include reopening discussions and soliciting revised proposals as appropriate, and make a new source selection decision. See *KBR Servs., LLC; Vectrus Sys. Corp.*, B-422697 *et al.*, Oct. 4, 2024, 2024 CPD ¶ 203 at 15; *KBR Servs., LLC; Vectrus Sys. Corp.*, B-422697.2 *et al.*, Oct. 4, 2024, 2024 CPD ¶ 241 at 12; *Vectrus Sys., LLC*, B-422697.6, B-422697.10, Oct. 4, 2024, 2024 CPD ¶ 242 at 10. The agency is currently implementing the recommendations from those sustained protests. COS/MOL at 5.

Class Justification for Exception to Fair Opportunity

Following the decisions sustaining the APS task order protests, the agency determined that the associated corrective actions, as well as changes in requirements and combatant command priorities, had affected the COA timelines the agency considered at the time it submitted the Section 113 Report. *Id.* In reviewing those effects, the agency concluded that the efficiencies in time and economic advantages of COA 2 now outweighed the benefits of COA 1. *Id.* at 6. As discussed above, proceeding with COA 2 entails extending the existing PTOs on a sole-source basis to permit the agency time to complete the LOGCAP VI procurement and issue new PTOs under that new IDIQ vehicle. On April 2, 2025, therefore, the agency executed a class justification for exception to fair opportunity (JEFO) to support the sole-source extensions of the existing PTOs through the addition of option periods. *Id.*; AR, Tab 11, JEFO.

As authority for the extensions, the JEFO cited FAR section 16.505(b)(2)(i)(C), which permits the issuance of a task order on a sole-source basis where “[t]he order must be issued on a sole-source basis in the interest of economy and efficiency because it is a logical follow-on to an order already issued under the contract, provided that all awardees were given a fair opportunity to be considered for the original order.” AR, Tab 11, JEFO at 9. The reason for citing that authority was “the successful GAO protests of the APS task order awards, and the unforeseen reporting requirements of Section 113 of [the 2024 NDAA.]” *Id.*

To that end, the JEFO discussed as factual background how the timelines the agency considered at the time it submitted the Section 113 Report had been affected by those events. *Id.* at 10-12. The JEFO noted that the timelines associated with COA 1 had shifted as follows:

	EAGLE APS to LOGCAP		LOGCAP V.V		LOGCAP VI	
	Original	Updated	Original	Updated	Original	Updated
RFP Released	May 2023	May 2023	July 2024	April 2025	June 2026	November 2027
Source Selection Completed	May 2024	September 2025	July 2025	August 2027	November 2027	September 2030
Award	July 2024	November 2025	September 2025	October 2027	January 2028	October 2030
Protest Completed	September 2024	March 2026	January 2026	October 2028	January 2029	October 2031
Transition Completed	February 2025	August 2026	November 2026	April 2029	August 2029	April 2032

Id. at 10, 11.

The JEFO also discussed how the timelines associated with COA 2 had been affected, stating as follows:

	EAGLE APS to LOGCAP		LOGCAP VI	
	Original	Updated	Original	Updated
RFP Released	May 2023	May 2023	August 2024	December 2025
Source Selection Completed	May 2024	September 2025	January 2026	July 2028
Award	July 2024	November 2025	March 2026	August 2028
Protest Completed	September 2024	March 2026	March 2027	August 2029
Transition Completed	February 2025	August 2026	October 2027	February 2030

Id. at 10-12.

As discussed above, the Section 113 Report stated that COA 2--pursuant to which the agency would bypass the LOGCAP V.V procurement and instead compete and issue PTOs in connection with the LOGCAP VI procurement--entailed extending the existing PTOs on a sole-source basis to permit the agency time to complete the LOGCAP VI procurement. Because of the newly-imposed delays to a LOGCAP V.V procurement, however, the JEFO stated that both COAs now required sole-source extensions to the PTOs. *Id.* at 12. Relevant to this protest, the last option period of the existing EUCOM PTO issued to KBR Services was set to expire on September 29, 2025. *Id.* at 6. Under COA 1, the agency expected transition to a successor EUCOM PTO to be complete in April 2029. The JEFO stated that COA 1 therefore would require extending the existing

EUCOM PTO on a sole-source basis for 4 years. *Id.* at 12, 17. Under COA 2, the agency expected transition to both LOGCAP VI and a successor EUCOM PTO issued under LOGCAP VI to be complete in February 2030. The JEFO stated that COA 2 therefore would require extending the existing EUCOM PTO on a sole-source basis for 4.5 years. *Id.* at 12-13, 17. The JEFO provided similar analysis for the other existing PTOs, including the sole source extension to the protester's own SOUTHCOM PTO. See *id.* at 6-8, 12-13, 16-17.

JEFO--Economy Analysis

In discussing the reasons of economy supporting extending the existing PTOs on a sole-source basis in order to enable the agency to pursue COA 2, the JEFO identified three areas of cost savings to the agency:

(1) cost savings from an efficient use of Army resources in fewer contracting actions; (2) enhancing competition by allowing a greater number of offerors on the base contract who can utilize innovative approaches and new technology; and (3) the cost savings from awarding new task orders under competitive circumstances with the shortest possible sole source extensions.

Id. at 12.

With respect to the first area, the agency noted that COA 2 would present "cost savings associated with the time and resource efficiencies of only having one competition versus two, plus the contract savings associated with fewer transitions." *Id.* The agency estimated that conducting only one competition under COA 2--*i.e.*, the LOGCAP VI procurement--as opposed to two competitions under COA 1--*i.e.*, the LOGCAP V.V procurement followed by the LOGCAP VI procurement--would "have a substantial economic cost savings resulting in approximately \$3M per year for 25 Full Time Equivalents."³ *Id.* at 13.

With respect to the second area, the agency stated that it expected to compete the LOGCAP VI procurement on a full and open basis, thereby opening up the competition for successor PTOs beyond the four LOGCAP V contractors. *Id.* The agency therefore expected that "[m]oving directly to LOGCAP VI under COA 2 will lower overall costs by

³ While the JEFO did not discuss the costs associated with task order transitions in a similar fashion, the agency's business case analysis that formed part of the Section 113 Report stated that among the agency's assumptions was that "[t]ransition costs for an incumbent to incoming contractor are 13 [percent] of task order value; this figure is based on a historical average from the LOGCAP IV to V transition. For cost prediction purposes, the [agency] assumed each transition, whether LOGCAP V recompetes or LOGCAP V to LOGCAP VI, will entail an incumbent to incoming contractor transition." AR, Tab 9, Section 113 Report, encl. 1, Business Case Analysis at 12.

bringing in additional offerors and incorporating technological advancements and innovative approaches.” *Id.*

With respect to the third area, the agency stated that “sole source contracting is significantly more expensive than contracting through competitive measures.” *Id.* at 12. The agency stated that “COA 1 would require sole-source extensions of task orders and the base LOGCAP V IDIQ contracts for a total of three to six years.” *Id.* By comparison, the agency stated that “COA 2 would only require sole-source extensions of task orders for two to five years and should allow performance to commence on LOGCAP VI by 2030 and potentially no sole source extension to the base LOGCAP V IDIQ.” *Id.* at 12-13. The agency calculated that “[t]he reduction of sole source contracting by two years due to awarding under competitive circumstances will lead to a cost savings of approximately \$100M[.]” *Id.* at 13.

JEFO--Efficiency Analysis

The JEFO next addressed the reasons of efficiency supporting extending the PTOs on a sole-source basis. The agency identified three primary sources of efficiencies:

(1) elimination of time and effort spent by Army Contracting Command and LOGCAP Program Office personnel on redundant LOGCAP V.V PTO recompetes when a full LOGCAP VI competition will likely provide better results with similar efforts; (2) elimination of an additional round of contractor transitions on performance task orders[;] and (3) the ability to realize potential innovation sooner from a broader LOGCAP VI competition.

Id.

With respect to the first source of efficiencies, the JEFO discussed the delays that the APS task order procurements, protests, and corrective actions had caused to the start of the planned LOGCAP V.V procurements under COA 1. *Id.* The agency noted that “[t]he requirements and contracting team that was designated to start working the LOGCAP V.V task order competitions was . . . consumed with responding to the [APS task order] protests and ongoing corrective actions.” *Id.* The JEFO also discussed delays caused by the reporting requirements of the 2024 NDAA, stating that “[t]he same team that was working the [APS task order] protests was also required to submit the [Section 113 Report.]” *Id.* The JEFO further cited “additional questions received on the [Section 113 Report]” as contributing to delays to the COA 1 timelines. *Id.*

Similar to the economy section, the efficiency section of the JEFO also discussed the need for sole-source contracting actions under both COAs. Because of the delays to the LOGCAP V.V procurement, the agency stated that COA 1 would require sole-source extensions to the existing PTOs of between two and a half to four years, as well as extensions to the LOGCAP V IDIQ contracts themselves of two years to reach the transition to LOGCAP VI, which now was expected to occur in April 2032 under the

updated COA 1 timelines. *Id.* at 14. By contrast, COA 2 would require sole-source extensions of the existing PTOs of between two to five years but would not require sole-source extensions of the LOGCAP V IDIQ contracts, as transition to LOGCAP VI was expected to occur in February 2030 under the updated COA 2 timelines. *Id.* Accordingly, the agency concluded, “the total combined time of sole source extensions under COA 2 is shorter and therefore more efficient than the total combined time of sole source extensions under COA 1.” *Id.*

With respect to the second source of efficiencies, the JEFO stated that “[t]ransitioning requirements from one contractor to another is often challenging in any environment and that challenge is exacerbated in the type of contingency environments that LOGCAP often serves.” *Id.* The agency noted that “moving forward with the LOGCAP V.V competitions [followed by the LOGCAP VI procurement] instead of moving straight to LOGCAP VI will create the potential of multiple, inefficient transitions in a short period of time.” *Id.* Additionally, “[e]liminating the additional competition of LOGCAP V.V will reduce the schedule delay for the award of LOGCAP VI.” *Id.*

Finally, with respect to the third source of efficiencies, the JEFO noted that the Section 113 Report had “identified potential innovations and efficiencies derived from a LOGCAP VI competition[.]” *Id.* The agency stated that moving directly to the LOGCAP VI procurement without the intervening step of the LOGCAP V.V procurement “will allow the Government to more quickly analyze and receive the potential benefits from full competition on the cited proposed improvements in the LOGCAP VI requirement, including a web-based rapid requirements development and cost estimating tool, additional cost control measures, and dual sourcing concepts.” *Id.*

JEFO--Logical Follow-On Analysis

The JEFO also concluded that the sole-source extensions to the existing PTOs were logical follow-ons, stating that “[t]he work to be performed under each of the extended task orders is the same work that is being performed under the current task orders.” *Id.* at 15. The JEFO further stated that “[a]ll the task orders to be extended under this JEFO . . . have been previously competed.” *Id.* Additionally, the JEFO noted that each individual period of performance under the sole-source extensions would be 12 months, which matched the individual periods of performance of the existing PTOs. *Id.* The agency therefore concluded that “all the task orders to be extended under this JEFO are logical follow-ons to previous task orders that were competed.”⁴ *Id.*

⁴ As noted above, the JEFO provides the agency’s justification for extending all of the LOGCAP V PTOs, including the protester’s SOUTHCOM PTO, on a sole-source basis. The protester challenges only the sole-source extension of KBR Services’ EUCOM PTO.

The agency posted the JEFO to the System for Award Management (SAM.gov)⁵ on April 17, 2025. COS/MOL at 6. On April 18, the protester submitted an agency-level protest challenging the sole-source extension of the EUCOM PTO. *Id.* The protester supplemented that protest on April 28. *Id.* On September 10, the agency denied the agency-level protests. *Id.* at 7.

This protest to our Office followed on September 22.⁶

DISCUSSION

The protester alleges that the agency has not properly justified extending the EUCOM PTO on a sole-source basis under FAR section 16.505(b)(2)(i)(C), contending that the timelines underlying the agency's analysis are exaggerated and internally inconsistent, the decision to proceed directly to the LOGCAP VI procurement and bypass the planned LOGCAP V.V recompetition of the PTOs is not in the interest of economy and efficiency, and the sole-source extensions of the PTOs are not logical follow-ons to task orders that were previously competed.⁷ As discussed below, we find no basis on which to sustain the protest.

Standard of Review

While we have issued decisions involving the "logical follow-on" exception to fair opportunity procedures contemplated by FAR section 16.505(b)(2)(i)(C), those decisions did not specifically address the standard under which we will review a protest that an agency improperly relied upon that authority. *See, e.g., Nolij Consulting, LLC*, B-421563, July 3, 2023, 2023 CPD ¶ 166 at 6 (protester was not an interested party to challenge use of the logical follow-on exception to modify a task order because it did not hold an IDIQ contract under which the task order was issued); *Palmetto GBA, LLC*, B-299154, Dec. 19, 2006, 2006 CPD ¶ 200 at 6 n.5 (where solicitation for IDIQ contract advised that only firms receiving task orders for certain requirements would be eligible to receive task orders for related optional requirements, the protester had an opportunity

⁵ SAM.gov is the current governmentwide point of entry which serves as the single point where government business opportunities greater than \$25,000, including synopses of proposed contract actions, solicitations, and associated information, can be accessed electronically by the public. FAR 2.101.

⁶ Per the JEFO, the anticipated value of each 1-year option to be added to the EUCOM PTO is \$621 million, making the total value of the five options \$3.105 billion. *See* AR, Tab 11, JEFO at 6-7. Accordingly, this protest is within our jurisdiction to hear protests related to the issuance of orders under multiple-award IDIQ contracts that were awarded under the authority of title 10 of the United States Code. 10 U.S.C. § 3406(f)(1)(B).

⁷ The protester raises other collateral arguments. While we do not address each of the protester's allegations and variations thereof, we have reviewed them all and conclude that none provides a basis to sustain the protest.

to compete for the optional requirements, and a task order for such optional requirements “could also be considered a ‘logical follow-on’”).

The provisions of the FAR governing Federal Supply Schedule (FSS) procedures discuss the circumstances that justify limiting sources in terms closely similar to those found in FAR subpart 16.5. *Compare* FAR 8.405-6(a)(1)(i)(C), stating that among “the only circumstances that may justify” limiting sources is that:

[i]n the interest of economy and efficiency, the new work is a logical follow-on to an original Federal Supply Schedule order provided that the original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures. The original order or [blanket purchase agreement] must not have been previously issued under sole-source or limited-sources procedures.

with FAR 16.505(b)(2)(i)(C):

The contracting officer shall give every awardee a fair opportunity to be considered for a delivery order or task order exceeding the micro-purchase threshold unless . . . [t]he order must be issued on a sole-source basis in the interest of economy and efficiency because it is a logical follow-on to an order already issued under the contract, provided that all awardees were given a fair opportunity to be considered for the original order.

Thus, in order to justify departing from the presumption of open competition and issue an order on a sole-source basis, both provisions require that: (1) the interests of economy and efficiency support limiting competition; (2) the requirement is a logical follow-on to a previously-issued order; and (3) the previous order was issued on the basis of relevant competition requirements.

We previously have stated that we will review an agency’s use of a limited sources justification under FAR subpart 8.4, including a decision to issue a noncompetitive follow-on order pursuant to FAR subsection 8.405-6(a)(1)(i)(C), for reasonableness. *Harmonia Holdings Grp., LLC*, B-417465, July 16, 2019, 2019 CPD ¶ 257 at 12; *XTec, Inc.*, B-405505, Nov. 8, 2011, 2011 CPD ¶ 249 at 5; *see also KoHealth Techs., LLC*, B-423440, July 10, 2025, 2025 CPD ¶ 155 at 4 (applying same standard to sole-source extension of FSS task order that relied on FAR subsection 8.405-6(a)(1)(i)(C)). In conducting such a review, we consistently have stated that an agency’s limited sources justification is reasonably made in the interest of economy and efficiency where it is based upon documented concerns regarding disruption of service, duplication of efforts, transition delays, and/or increased costs. *KoHealth, supra* at 5; *Harmonia Holdings, supra* at 12-13.

The protester argues that applying “the deferential standard” outlined above with respect to review of limited sources justifications under FAR subsection

8.405-6(a)(1)(i)(C) to procurements conducted under FAR subpart 16.5 “would be erroneous and fatally flawed as FAR [section] 8.405 does not contain the same competition requirements of FAR [section] 16.505.” Protest at 26. Consequently, the protester contends, “agencies must provide a compelling reason why ‘economy and efficiency’ requires a sole-source task order.” *Id.* at 27. As the agency points out, however, “FAR [p]art 8 is not completely devoid of competition requirements.” COS/MOL at 14. In that regard, FAR section 16.505(b)(1) requires that each awardee of a multiple-award IDIQ contract be provided “a fair opportunity to be considered for each order exceeding the micro-purchase threshold” unless the agency justifies an exception to the fair opportunity process under paragraph (b)(2) of that section. Similarly, for services requiring a statement of work and that exceed the simplified acquisition threshold, FAR subsection 8.405-2(c)(3)(i) requires that each order “be placed on a competitive basis . . . unless this requirement is waived on the basis of a justification that is prepared and approved in accordance with [FAR subsection] 8.405-6.”

Given that both FAR subsection 8.405-6(a)(1)(i)(C) and FAR section 16.505(b)(2)(i)(C) provide authority for excepting an action from otherwise-applicable competition requirements, and describe the circumstances under which competition may be limited in nearly identical terms, we conclude that our decisions addressing the standard to be applied to limited sources justification under FAR subsection 8.405-6(a)(1)(i)(C) are instructive when considering similar circumstances under FAR section 16.505(b)(2)(i)(C). See also *PricewaterhouseCoopers Public Sector, LLP*, B-415504, B-415504.2, Jan. 18, 2018, 2018 CPD ¶ 35 at 5-6 (rejecting argument that the RFQ exception to the late proposal rule should not apply to a fair opportunity competition because FAR subpart 16.5 “require[s] a significantly greater level of procedural rigor’ than task order competitions conducted under FAR subpart 8.4”). We therefore apply that same standard here in examining the agency’s justification for excepting the challenged action from the fair opportunity requirements of FAR subpart 16.5 pursuant to FAR section 16.505(b)(2)(i)(C).

Timelines

The protester alleges that the timelines upon which the JEFO rests are exaggerated and internally inconsistent, thereby rendering the agency’s conclusions unreasonable. Protest at 29-33; Comments at 26-28. The protester focuses on four areas in contending that the JEFO is unreasonable.

First, the protester argues that the agency’s corrective actions in response to the sustained protests of the APS task orders “were minor and do not require the amount of time captured in the updated timeline.” Protest at 31; Comments at 27. Notwithstanding the fact that the protester filed its challenge with our Office on September 22, 2025, the protester contends that “[m]aking new source selections should not take until September 2025[.]” *Id.* The agency responds that it is within its discretion to determine the amount of time it estimates those corrective actions will take,

and states that as of December 2025 such corrective action is ongoing. COS/MOL at 5, 16.

The details of implementing corrective action largely are within the discretion of the contracting agency, and we generally will not object to any particular corrective action, provided it is appropriate to remedy the concern that prompted the agency to take corrective action. *ManTech Advanced Sys. Int'l, Inc.*, B-421560.4, Aug. 14, 2023, 2023 CPD ¶ 210 at 11. Here, the protester's sole basis for arguing that the agency's estimate of the time to complete the corrective actions for the APS procurements is the protester's belief that those actions should not take as long as the agency estimates. We have recognized, however, that an objection to the length of time taken to complete corrective action is not a cognizable basis of protest, absent identification of some violation of procurement law or regulation by the agency. *AboutWeb LLC--Protest and Costs*, B-416116.2, Nov. 9, 2018, 2018 CPD ¶ 386 at 4; *LS3 Inc.*, B-415635.2, Nov. 2, 2018, 2018 CPD ¶ 380 at 3-4; *Computer Cite*, B-412162.3, July 15, 2016, 2016 CPD ¶ 186 at 4. That the protester believes the agency could move more expeditiously does not render the agency's estimate unreasonable.

Second, the protester contends that the agency's estimate of two and a half years to complete the LOGCAP V.V procurement is excessive. Protest at 31-32; Comments at 27. The protester cites the development of labor staffing models under LOGCAP V to expedite the procurement timeline for task orders under that contract, as well as GAO's analysis of the agency's procurement administrative lead time (PALT). *Id.* (citing *Defense Contracts: Better Monitoring Could Improve DOD's Management of Award Lead Times*, GAO-24-106528 at 13 (Mar. 2024)). The agency responds that its estimate is reasonable, based on the size and complexity of the LOGCAP V.V procurement, and that the protester's reliance on GAO's analysis is misplaced, as the protester cites discussion of the median PALT, which "does not account for the complexity and size of the LOGCAP contracts or the internal discussions and senior leader involvement." COS/MOL at 15. The agency further points to GAO's conclusion that the median PALT increased for awards valued at or above \$50 million, which a new EUCOM PTO would substantially exceed. *Id.*

On this record, we conclude that the protester has not demonstrated that the agency's time estimate for the LOGCAP V.V procurement is unreasonable. In assessing its procurement options, the agency considered the specific facts applicable to the LOGCAP V.V procurement, including the anticipated size and complexity of the procurement, as well as internal agency processes the agency expected would affect the time to issue and transition to successor PTOs under that course of action. Similarly, the agency has articulated a reasonable basis why conclusions based on an analysis of a broader set of procurements are not applicable to this particular requirement.

Additionally, we have recognized that a delay in meeting procurement milestones generally is a procedural deficiency which does not provide a basis of protest because it has no effect on the validity of the procurement. *See, e.g., Federal Sales Servs., Inc.*,

B-237978, Feb. 28, 1990, 90-1 CPD ¶ 249; *American Fuel Cell & Coated Fabrics Co.*, B-234395, Feb. 21, 1989, 89-1 CPD ¶ 183; *Trim-Flite, Inc.*, B-229926.4, July 28, 1988, 88-2 CPD ¶ 124. We generally will not review such challenges absent a showing of improper conduct on the part of the procuring agency. *Second Street Holdings LLC et al.*, B-417006.4 *et al.*, Jan. 13, 2022, 2022 CPD ¶ 33 at 11. As with the protester's allegation relating to implementation of corrective action in the APS task order procurements, the protester's belief that the agency could execute the LOGCAP V.V procurement more quickly, on its own, is insufficient to demonstrate improper conduct by the agency here.

Third, the protester argues that the agency has not explained why it cannot begin the LOGCAP VI procurement concurrently with conducting the LOGCAP V.V competition, alleging that "absolutely nothing would prevent the agency from proceeding with the LOGCAP V.V recompetete . . . and still issuing the LOGCAP VI solicitation at the end of 2025." Protest at 32; Comments at 27-28. The agency responds that it is within its discretion to determine what method of procurement will best satisfy its needs. COS/MOL at 16.

We note that both COA 1 and COA 2 assumed sequential execution of the procurements involved. Thus, COA 1 assumed completion of the APS task order procurement under LOGCAP V before proceeding to LOGCAP V.V, and, in turn, completion of the LOGCAP V.V procurement before proceeding to LOGCAP VI. Similarly, COA 2 assumed completion of the APS task order procurement under LOGCAP V before proceeding to LOGCAP VI. Thus, both courses of action assumed the same resource constraints, which were reflected in both the JEFO and the Section 113 Report. See, e.g., AR, Tab 11, JEFO at 13 (noting that the same requirements and contracting team designated for the LOGCAP V.V procurement was responsible for responding to the APS task order protests and implementing the associated corrective action); Tab 9, Section 113 Report, encl. 1, Business Case Analysis at 21-22 (noting that the agency has "a limited amount of acquisition professionals available" and therefore would rate lower "a scenario where one acquisition team has to work on multiple solicitation actions simultaneously, or with periods of overlap between multiple solicitations, and/or require the stakeholder commands to form multiple acquisition teams to cover the workload").

By requiring the agency to consider simultaneous execution of the LOGCAP V.V and LOGCAP VI procurements under COA 1, but sequential execution of procurements under COA 2, however, the protester's argument would entail the application of different resource constraints to each scenario. In the protester's proffered strategy, the agency would dedicate resources to simultaneously execute procurements only under COA 1 but not under COA 2, thereby giving rise to an apples-to-oranges comparison between the agency's two courses of action. In this way, the protester's argument fails to demonstrate the unreasonableness of the agency's analysis. Furthermore, to the extent the protester suggests that the agency was required to consider a third course of action, we have stated in the context of limited source justifications under FAR subsection 8.405-6(a)(1)(i)(C) that a follow-on award is permissible under that authority if it is in the

interest of economy and efficiency, despite the existence of alternative acquisition strategies. *KoHealth, supra* at 5; *Harmonia Holdings, supra* at 14 n.13. Thus, the protester's proffer of an alternative acquisition strategy also fails to demonstrate that the reasoning underlying the JEFO is unreasonable.

Finally, the protester alleges that the agency "has not attempted to explain why the estimated duration of every single one of the procurements, whether in COA 1 or COA 2, increased so significantly in its revised timeline." Protest at 32; Comments at 27. While the protester's argument that the revised timelines are unreasonable relies in part on the GAO analysis addressed above, the protester also points to the period for protests in the revised timeline, noting that the original estimate of 4 months for protests of the LOGCAP V.V procurement is consistent with the 100-day period for protests filed with GAO, while the revised estimate of 1 year for such protests is not. Protest at 31-32, 39 n.31, 40; Comments at 28 n.23. The agency again responds that this argument represents only the protester's disagreement with the agency's reasonable exercise of its discretion. COS/MOL at 16.

The protester is correct that the record provides little enlightenment as to why the JEFO's estimate of the duration of protests of the LOGCAP V.V procurement grew from 4 months in the original timeline to 12 months in the revised timeline. We further note that the record is similarly unclear as to why the JEFO's estimate of the duration of protests of the LOGCAP VI procurement in both the original and revised timelines is 12 months; in comparison, the Section 113 Report stated that protests to the U.S. Court of Federal Claims and appeals thereof to the U.S. Court of Appeals for the Federal Circuit--which would have jurisdiction over protests of the LOGCAP VI awards but not the issuance of the LOGCAP V.V PTOs--could "delay start of performance approximately two to three years on average."⁸ AR, Tab 9, Section 113 Report at 15.

As discussed above, the agency concluded that, as a result of intervening events, both COA 1 and COA 2 now entail sole-source contracting actions. The JEFO's conclusion that it was in the interest of economy and efficiency to extend the existing PTOs on a sole-source basis to enable the agency to proceed directly to the LOGCAP VI procurement rested in part on the agency's analysis that the total combined time of sole-source actions under COA 2 was shorter, and that the associated reduction in sole-source contracting offered cost savings of approximately \$100 million. AR, Tab 11, JEFO at 13, 14.

To the extent the JEFO's protest duration estimates had the effect of extending the timeline for COA 1 and abbreviating the timeline for COA 2, we nevertheless cannot conclude that the agency's judgment in this regard was unreasonable under the circumstances presented here. The agency's judgment at the time it submitted the Section 113 Report was that COA 1 would require no sole-source actions, while COA 2

⁸ With respect to the LOGCAP VI procurement, the timelines for each course of action in the Section 113 Report assumed a GAO protest period of 4 months followed by a court protest period of 22 months. AR, Tab 9, Section 113 Report, encl. 4, COA timelines.

would require such actions. Because of the delays caused by intervening events, however, the agency found that both courses of action now would require sole-source actions. Even if the JEFO's timelines were adjusted to reflect the protest durations contemplated in the Section 113 Report, both courses of action nevertheless would require sole-source actions for substantial periods of time.⁹

The protester has not demonstrated that such an adjustment would render the agency's conclusions unreasonable in this regard. Rather, the protester's objection reflects its disagreement with the agency's estimate of the periods of time necessary to resolve any potential protests or to implement any necessary responsive corrective actions to such protests. While reasonable minds may differ as to whether such estimates are overly optimistic or conservative, such a disagreement, without more, fails to provide a basis to object to the agency's reasonable subjective judgments as to its forecasted schedule estimates. Furthermore, we have recognized that FAR subsection 8.405-6(a)(1)(C) does not require an agency to quantify the potential economic and efficiency benefits of a logical follow-on order or otherwise find that such a follow-on award would definitively result in the most significant potential cost savings to the government. *Harmonia Holdings, supra* at 13. We also discern no similar such requirement in FAR section 16.505(b)(2) and therefore do not impose one here.

Although agencies are obligated to engage in reasonable advance planning prior to conducting procurements, our Office has recognized that the specific activities associated with this requirement may vary from procurement to procurement, and that the obligation does not constitute a requirement that procurement planning be perfect, that is, completely error-free. *Raytheon Co.*, B-410719.10, B-410719.11, Nov. 15, 2016, 2019 CPD ¶ 119 at 13. For the reasons stated above, we deny the protester's allegation that the agency's justification for the sole-source extension of the EUCOM PTO is unreasonable because the timelines upon which the justification rests are exaggerated and internally inconsistent.

Economy and Efficiency

The protester raises various challenges to the agency's conclusion that extending the existing PTOs in order to accelerate the transition from LOGCAP V to LOGCAP VI is in the interest of economy and efficiency. Protest at 33-36; Comments at 20-25. The agency responds that it has documented a reasonable basis for determining that the sole-source extensions of the PTOs is in the interest of economy and efficiency, and that the protester's concerns reflect only its disagreement with the agency's judgment. COS/MOL at 16-18. Upon review of the record, we find no basis to sustain the protest.

⁹ As noted above, the protest durations contemplated by the Section 113 Report for the LOGCAP VI procurement were the same under both COA 1 and COA 2. See n.8 *supra*. Thus, any such adjustment would apply equally to both courses of action with respect to the timelines for the LOGCAP VI procurement.

As stated above, we will apply the same principles here as those we have applied in conducting a review of an agency's reliance upon the logical follow-on exception to competition in FAR subsection 8.405-6(a)(1)(C). Thus, we have stated that an agency's limited sources justification is reasonably made in the interest of economy and efficiency where it is based upon documented concerns regarding disruption of service, duplication of efforts, transition delays, or increased costs. *KoHealth, supra* at 5; *Harmonia Holdings, supra* at 12-13. Additionally, there is no requirement that an agency consider competitive acquisition strategies prior to issuing a logical follow-on order. *KoHealth, supra* at 5. Nor is there a requirement that an agency consider whether the logical follow-on order is the most economical or efficient acquisition strategy. *Id.* Thus, the question is not whether another strategy or another source could satisfy the agency's needs, but whether the agency reasonably determined it would likely conserve time and other resources by issuing the follow-on order. *Id.*

The protester contends that the agency's conclusion that competing successor PTOs under LOGCAP VI rather than under LOGCAP V.V will enhance competition "lacks any basis in logic[.]" because, regardless of which course of action the agency undertakes, the agency will conduct the LOGCAP VI competition and issue new PTOs under that new IDIQ vehicle. Protest at 33-34. The protester focuses on the fact that the agency "is instead opting for zero competition for LOGCAP V.V[.]" *Id.* at 34. The protester's narrow focus on the LOGCAP V.V procurement, however, does not squarely meet the agency's consideration of the broader picture.

The JEFO, citing the Section 113 Report, states that the agency expects the LOGCAP VI procurement to offer innovations and efficiencies that are not presently available under LOGCAP V. AR, Tab 11, JEFO at 14; Tab 9, Section 113 Report at 18-19. The protester has not adduced any facts to show that the agency's expectation is unreasonable in this regard. The JEFO also states that the agency expects to obtain additional benefits, including cost savings, for successor PTOs issued under LOGCAP VI rather than LOGCAP V.V, as the pool of offerors will not be limited to only those four contractors holding LOGCAP V contracts. AR, Tab 11, JEFO at 14. We do not find unreasonable the agency's conclusion that a larger pool of potential contractors presents an opportunity for greater competitive pressure likely to lead to reduced costs. In sum, the agency's judgment is that accelerating the benefits expected under LOGCAP VI outweighs delaying its receipt of those benefits for a competition under LOGCAP V.V. While the protester disagrees with that judgment, its disagreement, without more, is insufficient to demonstrate that the agency's conclusions are unreasonable.¹⁰

¹⁰ The protester similarly alleges that the agency "does not explain what the 'better results' [under COA 2] would be." Protest at 35. As detailed above, however, the JEFO both points to the Section 113 Report's identification of potential innovations and efficiencies to be derived from the LOGCAP VI competition, as well as cites specific examples "including a web-based rapid requirements development and cost estimating tool, additional cost control measures, and dual sourcing concepts." AR, Tab 11, JEFO at 14.

The protester also alleges that the agency's conclusion that COA 2 would result in less sole-source contracting than COA 1 overall is based upon flawed timeline estimates. Protest at 34. As discussed above, the protester's disagreement with the agency's estimates is insufficient to demonstrate that they are unreasonable, and it was reasonable for the agency to conclude that both courses of action would require sole-source contracting actions for substantial amounts of time, thereby minimizing a key advantage of COA 1 at the time the agency submitted the Section 113 Report. Consequently, this argument also fails to show that the agency's conclusions are unreasonable. Additionally, the agency's concerns about the need for sole-source contracting are grounded in part on cost considerations; the JEFO states that "[a]s generally understood, sole source contracting is significantly more expensive than contracting through competitive measures." AR, Tab 11, JEFO at 12. Thus, the agency's justification is based upon documented concerns regarding increased costs.

Next, the protester contends that the reasons of efficiency cited by the agency's justification are inapplicable because the agency "could simultaneously work on LOGCAP V.V and LOGCAP VI" and "could recompetete the PTOs with sufficient length to coincide with its (suspect) beginning of LOGCAP VI in 2032." Protest at 35-36. As discussed above, that the protester believes the agency could execute a different acquisition strategy is not sufficient to demonstrate that the agency's analysis is unreasonable. This argument, too, therefore provides no basis to sustain the protest.

The protester further argues that the agency's consideration of transition costs is unreasonable because the agency's concerns are hypothetical, and that "the contractors' [LOGCAP V.V] offers will provide concrete information about any transition(s) to inform the [agency's] decision." *Id.* at 36. The JEFO stated that among the cost savings the agency expected by proceeding with COA 2 were "the contract savings associated with fewer transitions[.]" AR, Tab 11, JEFO at 12, which the Section 113 Report estimated at "13 [percent] of task order value" based on historical data, AR, Tab 9, Section 113 Report, encl. 1, Business Case Analysis at 12. Because the agency expected two PTO transitions under COA 1--first following the LOGCAP V.V competition and second following the LOGCAP VI competition--as compared to one transition under COA 2--solely following the LOGCAP VI competition--the agency concluded that COA 2 would present cost savings with respect to transition costs. Thus, the agency's justification rests in part on concerns about duplication of costs, estimated at 13 percent of the value of each PTO for each transition.

We previously have stated that such concerns about duplication of costs associated with a transition to a new contractor may reasonably support excepting a logical follow-on requirement from competition for reasons of economy and efficiency. See, e.g., *Noble Supply & Logistics*, B-417269, Apr. 30, 2019, 2019 CPD ¶ 167 at 7-8; *XTec*, *supra* at 6-8. While the protester is correct that the agency could obtain more certainty about transition costs associated with the LOGCAP V.V procurement if it proceeded with that competition, requiring the agency to do so would require the agency to conduct a competition to then ascertain whether it would be more economical and efficient to

issue a logical follow-on order. This process, which would force the agency to delay its decision-making, would defeat the very purpose of the logical follow-on exception. Here, the agency's analysis is based upon a good-faith estimate, grounded in past experience, of transition costs it expects to incur. The protester has not demonstrated that the agency's estimate was unreasonable, and the agency properly relied upon it in reaching its conclusions in the JEFO. We therefore deny this allegation.

Finally, the protester contends that the JEFO inappropriately cites the cost savings of conducting only one competition under COA 2, as compared to conducting two competitions under COA 1. Protest at 33; Comments at 21-22. The protester argues that "the agency's concerns relate to purely administrative costs of conducting the [LOGCAP V.V] procurement[.]" Comments at 21, and that if the "cost savings by avoiding the allocation of resources to perform contracting actions . . . [were] a sufficient demonstration of 'economy' pursuant to FAR [section] 16.505(b)(2), every single follow-on task order could be awarded on a non-competitive basis, and contrary to statute and regulation, the exception would completely swallow the general rule of competition[.]" Protest at 33.

We have not located--and no party has cited--any decisional authority examining an agency's citation of administrative cost savings in support of the use of a logical follow-on exception to competition requirements. In decisions issued by our Office, the cost and time savings cited by agencies have related to savings associated with the services being procured, not any savings attributable to a reduced burden on agency contracting personnel. See, e.g., *KoHealth, supra* at 4 (agency's judgment that "changing contractors in the middle of an extremely complex project with impending critical and mandatory programmatic deadlines poses unnecessary risk to both project schedule and cost" was reasonable); *Harmonia Holdings, supra* at 12 (same); *Noble Supply, supra* at 7 (noting that "costs identified by [the agency], such as onboarding the new vendor and transporting its products to South Korea, would unquestionably be duplicated by a transition"); *XTec, supra* at 7 (replacement of hardware and custom interfaces would "likely involve a significant investment of time--and thus transition delay and potential disruption--and money").

Nonetheless, the record here does not show that the agency seeks to justify excepting this requirement from competition solely because of the cost, time, and effort associated with conducting one fewer competitive procurement and extending the PTOs on a sole-source basis. As discussed above, the agency also reasonably cites the benefits of accelerating transition to LOGCAP VI, including new approaches and technology resulting from a broader competition and the agency's ability to explore more flexible contracting structures. Additionally, the agency cites the duplication of costs that arises from contractor transitions. Proceeding with COA 1 potentially implicates two such transitions: one resulting from the LOGCAP V.V procurement and another following the LOGCAP VI procurement. COA 2, on the other hand, gives rise to only one transition, following the LOGCAP VI procurement. As the Section 113 Report notes, those costs are substantial, with the agency estimating transition costs at 13 percent of task order value based on historical data. Both courses of action achieve the same end state, *i.e.*,

the ultimate award of LOGCAP VI IDIQ contracts and the issuance of new PTOs under them. COA 2 both accelerates reaching that end state--thereby allowing the agency to reap the benefits of increased competition, new approaches and technology, and contract flexibility sooner--and eliminates the significant transition costs the agency expects it would incur pursuant to the LOGCAP V.V procurement.

Thus, the agency's justification for excepting this requirement from fair opportunity is reasonably based upon the interest of economy and efficiency. The agency has documented concerns regarding duplication of efforts and increased costs associated with transitioning contractors under the PTOs, delays in transitioning to LOGCAP VI, and increased costs resulting from delaying the LOGCAP VI procurement if the agency were to proceed with the LOGCAP V.V procurement. These concerns are the type that our Office has concluded reasonably support reliance upon a logical follow-on exception from competition requirements. We therefore deny the protester's allegation that the agency's justification is not reasonably made in the interest of economy and efficiency.

Logical Follow-On and Previous Competition

Lastly, the protester contends that the sole-source extension is not a logical follow-on to the existing EUCOM PTO, and that the previous competition requirement is not satisfied because of work that has been added to the PTO since it was competed as part of the LOGCAP V procurement. Protest at 36-37; Comments at 25-26. The agency responds that the JEFO reasonably documents the reasons why the sole-source extension is a logical follow-on to the EUCOM PTO, pointing to statements that the work to be performed is the same as under the current PTO and that the 12-month period of performance for each option matches the base and option periods of performance of the current PTO. COS/MOL at 13 (citing AR, Tab 11, JEFO at 15). The agency further points to the JEFO's statement that all of the existing PTOs were previously competed. *Id.*

Under FAR section 16.505(b)(2)(ii)(B)(4), a written justification for an exception to fair opportunity relying upon the logical follow-on exception "shall describe why the relationship between the initial order and the follow-on is logical (e.g., in terms of scope, period of performance, or value)." The JEFO here reasonably does so. As it states, the work to be performed under the sole-source extensions of each PTO, including the EUCOM PTO, is the same work that is currently being performed under each PTO. Thus, the work contemplated by the sole-source extension is a logical continuation of the services that have been provided under the EUCOM PTO to date. The JEFO therefore demonstrates that the follow-on sole-source extension has a logical relationship in terms of scope to the current PTO. Additionally, as the JEFO points out, the durations of the periods of performance under the sole-source extension match those under the current PTO.

The protester points to work that has been added to the EUCOM PTO on a noncompetitive basis as reasons both that the sole-source extension is not reasonably characterized as a logical follow-on and that FAR section 16.505(b)(2)(i)(C)'s

requirement that “all awardees were given a fair opportunity to be considered for the original order” is not satisfied. Comments at 25-26. Citing figures from the JEFO, the protester points out that, as originally issued, the EUCOM PTO’s value was approximately \$163 million. *Id.* at 25 (citing AR, Tab 11, JEFO at 18). The protester represents that the current amount obligated under the EUCOM PTO is approximately \$2.5 billion. *Id.* The protester states that most of that increase “relates to new work that was identified after award of the original EUCOM PTO, and added to the PTO on a sole source basis as a result of urgent circumstances. The new work was not competed, but added by UCA on a sole source basis, and paid for on a cost reimbursable basis.” *Id.* at 25-26.

In short, the protester argues that the value of the EUCOM PTO has grown to such a degree that the work contemplated by the sole-source extension, even to the extent it matches that currently being performed, does not bear a sufficiently close relationship to the work that was contemplated at the time the agency competed the EUCOM PTO to permit a finding that the sole-source extension is a logical follow-on or that the agency previously competed the requirement.

Both of these arguments are resolved by the terms of the LOGCAP V request for proposals (RFP). That RFP contained provisions expressly recognizing that, as needed, services could be added to PTOs, stating that “[t]he parties recognize the dynamic nature of LOGCAP support to current, future, and emergent requirements and expect the quantities, types, and locations of the services associated with the performance work statement [(PWS)] to change.” AR, Tab 5, LOGCAP V RFP at 25. To that end, the RFP outlined a process “to establish and/or adjust task order baselines (cost and fee) for non-competitive contract actions.” *Id.* The RFP identified several criteria for such changes, including “[t]he addition or elimination of an entire site (or multiple sites); . . . [t]he activation or deactivation of a PWS element . . .”; and “[w]orkload fluctuation[.]” among others. *Id.* at 26.

Thus, the RFP contemplated--and the LOGCAP V contractors competed for--a dynamic requirement that the parties expected would change and potentially grow and further expected such growth would be accounted for through noncompetitive changes to all of the PTOs, including the EUCOM PTO. *See Palmetto GBA, supra* at 6 n.5 (where solicitation for IDIQ contract advised that only firms receiving task orders for certain requirements would be eligible to receive task orders for related optional requirements, the protester had an opportunity to compete for the optional requirements, and a task order for such optional requirements “could also be considered a ‘logical follow-on’”); *cf. Lasmer Indus., Inc., B-400866.2 et al.*, Mar. 30, 2009, 2009 CPD ¶ 77 at 6 (explaining in determining whether a modification is a “cardinal change” that triggers the Competition in Contracting Act’s competition requirements that we “consider whether the solicitation for the original contract adequately advised offerors of the potential for the type of change found in the modification, and thus whether the modification could have changed the field of competition”).

Accordingly, the work contemplated by the sole-source extension bears a logical relationship to the scope of the EUCOM PTO as issued, even taking into consideration work and value that has been added to that PTO since its issuance. Similarly, the protester and the other LOGCAP V contractors had a fair opportunity to be considered for the EUCOM PTO, which contemplated that such growth might occur.¹¹ We therefore conclude that the agency has reasonably demonstrated that the sole-source extension is a logical follow-on to the EUCOM PTO, and that all LOGCAP V IDIQ contract holders had a fair opportunity to be considered for that PTO.

The protest is denied.

Edda Emmanuelli Perez
General Counsel

¹¹ Because the LOGCAP V RFP expressly contemplated that the PTOs, including the EUCOM PTO, might grow and that such growth would be accounted for through noncompetitive actions, we need not and do not reach the premise of the protester's argument that satisfaction of the logical follow-on exception's requirement for previous fair opportunity requires that contract holders have had a fair opportunity to compete for the task order as it exists at the time of the agency's justification, rather than as it existed as originally issued.