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Decision

Matter of: Pacific Ohana Laulima, LLC

File: B-424314; B-424314.3

Date: June 9, 2026

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DIGEST

Protest challenging the agency's evaluation of the protester's proposal and resulting exclusion from the competition is denied where the record shows that the evaluation was reasonable and the exclusion of its proposal was consistent with the solicitation's two-phase selection process.

DECISION

Pacific Ohana Laulima, LLC (Pacific), a small business located in Tamuning, Guam, protests the exclusion of its proposal from the second phase of competition under request for proposals (RFP) No. W9128F26RA024, issued by the Department of the Army, Army Corps of Engineers (Corps), for design-build and design-bid-build construction services. Pacific contends that the agency's evaluation of its phase one proposal was unreasonable and not in accordance with the solicitation criteria.

We deny the protest.

BACKGROUND

On October 17, 2025, the Corps issued the RFP as a small business set-aside for the award of up to six indefinite-delivery indefinite-quantity (IDIQ) multiple award task order contracts (MATOC) with a 4-year base period and a 3-year option period. Contracting Officer Statement (COS) at 1. Task orders would be solicited and competed among the IDIQ contract holders, with the total value up to \$699 million for the entire pool of

contracts. Agency Report (AR), Exh. 8, RFP amend. 3, section 00 21 00 at 2; AR, Exh. 9, RFP amend. 3, section 00 22 00 at 2.¹

The procurement will provide construction services to support the military petroleum oil and lubricants (POL) facility requirements and mission of the Department of Defense fuels infrastructure within the continental United States, Alaska, Hawaii, and outlying areas. COS at 1; AR, Exh. 8, RFP amend. 3, section 00 21 00 at 2; AR, Exh. 9, RFP amend. 3, section 00 22 00 at 2. The scope of work includes, but is not limited to, replacement of aging fuel infrastructure and/or components, repair of storage tanks and containment areas, POL system upgrades and maintenance, facility demolition, construction of fuels support facilities, regulatory compliance, and design to support the construction work projects for the primary customer, Defense Logistics Agency. COS at 1.

The RFP further stated that the selected MATOC contractors will be required to perform various design and construction services described in RFP section 01 11 00 as specialized work requirements. These specialized work requirements were delineated in Table 1 of section 01 11 00 as follows:

1. Construction, maintenance, repair and demolition of POL facilities and infrastructure, to include design. Facilities and infrastructure include, but are not limited to, facilities in direct support of the fuel receipt, pipeline, storage, transfer, containment, laboratory testing, POL operations, quality control, equipment, and dispensing systems.
2. Tank rehabilitation. Work consists of construction, repairing, replacing, and upgrading coatings, worn components, corrosion, and deficiency to the tank systems necessary to make the tank fully functional for support of mission requirements. Components typically include valves, pumps, piping, controls, dikes/berms, structural components (shell/tank bottom), life safety, and fire safety systems.
3. Tank cleaning prior to inspection and upgrades. Work includes cleaning to remove residual fuel products, water/sludge removal, and preparation of tank for inspection.
4. Repairs and Emergency Inspections only. This includes POL facility inspections to determine condition. The inspection report documents current conditions and requirements for servicing, repairs, and upgrades.

AR, Exh. 10, RFP section 01 11 00, Specialized Work Requirements at 2.

¹ The RFP was amended three times. Citations to the record in this decision are to the Adobe PDF pagination of the documents produced by the parties.

The RFP established a two-phase competition. For phase one, which is the subject of this protest, offerors were required to submit proposals to address the following evaluation factors listed in descending order of importance: (1) past performance; and (2) overall program management/technical approach.² AR, Exh. 9, RFP amend. 3, section 00 22 00 at 2. Relevant here, the RFP stated that up to eight of the most highly qualified offerors would be invited to phase two of the competition. *Id.*

With respect to past performance, the RFP required the offeror to provide four past performance references for itself or a first-tier subcontractor. At least two references had to be design-build projects; the other two could be either design-build or design-bid-build projects. AR, Exh. 8, RFP amend. 3, section 00 21 00 at 11-12. The RFP advised that past performance references should demonstrate the extent and relevance of the offeror's experience in the types of projects identified in section 01 11 00 of the RFP, the specialized work requirements. *Id.* at 12. The RFP also required offerors to provide completed contractor performance assessment reporting system (CPARS) reports or past performance questionnaires (PPQs) for each reference. AR, Exh. 8, RFP amend. 3, section 00 21 00 at 14.

The RFP stated that the past performance evaluation would include an assessment of the recency, relevancy, and quality of each offeror's past performance to determine the agency's level of expectation that the offeror would successfully perform the required effort.³ AR, Exh. 9, RFP amend. 3, section 00 22 00 at 3. Based on these assessments, the agency would assign one of the following confidence assessment ratings: substantial, satisfactory, neutral, limited, or no confidence.⁴ *Id.* at 4. The

² Although not at issue here, under phase two, proposals would be evaluated under the following factors in descending order of importance: technical approach for the sample project (factor 3); resumes of key personnel (factor 4); and proposed price for the sample project (factor 5). AR, Exh. 9, RFP amend. 3, section 00 22 00 at 2; AR, Exh. 16, Phase Two Selection Memorandum at 2.

³ Recency was defined as a project completed within 10-years from the original date proposals were due. AR, Exh. 9, RFP amend. 3, section 00 22 00 at 3, 6. Projects whose completion date was closer to the original proposal due date would have more impact on the overall past performance evaluation. *Id.* In determining the relevancy of each submitted project, the agency would consider the prior experience as measured against the scope of work as identified in section 01 11 00 of the RFP. *Id.* at 3, 7. The solicitation identified the levels of relevancy as: very relevant; relevant; somewhat relevant; or not relevant. *Id.* at 7.

⁴ The RFP defined "substantial confidence" as "the Government has a high expectation that the offeror will successfully perform the required effort." AR, Exh. 9, RFP amend. 3, section 00 22 00 at 4. The solicitation defined "satisfactory confidence" as "the Government has a reasonable expectation that the offeror will successfully perform the required effort." *Id.*

solicitation further provided that the agency would take a holistic view of the offeror's performance history with respect to the present acquisition. *Id.* at 3.

For factor 2, overall program management/technical approach, the solicitation required offerors to describe their proposed program management approach and organizational structure to adequately perform the solicited requirements. The agency would evaluate proposals under this factor to determine the effectiveness of the offeror's proposed management approach and organization through an assessment of the strengths, weaknesses, deficiencies, and risks in the proposal. The combined technical/risk adjectival ratings for this factor were: outstanding; good; acceptable; marginal; or unacceptable.⁵ AR, Exh. 9, RFP amend. 3, section 00 22 00 at 4-5.

The agency received 21 proposals in response to the solicitation, including a proposal from Pacific, by the November 17 phase one proposal due date. COS at 2; AR, Exh. 16, Phase Two Selection Memorandum at 3. Pacific submitted four past performance references: three were design-build projects (projects 1, 2, and 3) and the fourth, a design-bid-build project.⁶ AR, Exh. 11, Pacific Proposal Vol. 1, Past Performance at 4-11. Pacific also submitted completed CPARs for projects 1, and 3; and completed PPQs for projects 2, and 4 with its proposal. *Id.* at 12-29.

As relevant here, the source selection evaluation board (SSEB) evaluated Pacific's past performance and found all four references were recent because each had been completed within 4-5 years of the phase one proposal due date. AR, Exh. 14, Revised SSEB Consensus Report at 38. The SSEB determined that two references were very relevant (project 2, and 3); one was considered relevant (project 1); and the remaining reference (project 4) was determined to be somewhat relevant.⁷ *Id.* at 38-39. Based on

⁵ The RFP defined "outstanding" as "[p]roposal demonstrates an exceptional approach and understanding of the requirements and contains multiple strengths and/or at least one significant strength, and risk of unsuccessful performance is low." AR, Exh. 9, RFP amend. 3, section 00 22 00 at 5. The RFP defined "good" as "[p]roposal indicates a thorough approach and understanding of the requirements and contains at least one strength or significant strength, and risk of unsuccessful performance is low to moderate." *Id.*

⁶ Project 1, completed in 2023, was a design-build task order project to construct a truck fill stand at Wheeler Army Air Force Base in Hawaii. Project 2, completed in 2024, was a design-build task order project to clean, inspect, and repair of bulk fuel tanks at a military installation in Guam. Project 3, completed in 2021, was a design-build project to clean, inspect, and repair tanks at the Naval Air Station in Texas. Project 4, completed in 2024, was a design-bid-build project for hardening of POL infrastructure at a military installation in Guam. AR, Exh. 11, Pacific Proposal Vol. 1 Past Performance at 4-11; see also AR, Exh. 14, Revised SSEB Consensus Report at 38-39.

⁷ The RFP defined a rating of "somewhat relevant" as describing an effort involving "some" of the scope and magnitude of effort and complexities that the effort here
(continued...)

an overall assessment of the protester's references, the agency assigned Pacific a rating of satisfactory confidence; that is, the government has a reasonable expectation that the offeror will successfully perform the required effort. *Id.* at 38. In evaluating Pacific's overall program management/technical approach proposal, the SSEB identified two strengths and no weaknesses, significant weaknesses, or deficiencies. *Id.* at 40. The agency assigned Pacific a combined technical/risk rating of good under this factor. *Id.* at 39.

The agency's source selection advisory council (SSAC) reviewed the evaluation assessments and ratings assigned by the SSEB for all 21 phase one proposals and performed a comparative analysis. The SSAC then prepared a report with its recommendations for the eight most highly-qualified offerors that should be selected to participate in phase two of the competition. AR, Exh. 15, SSAC Report.

The source selection authority (SSA) reviewed the evaluation reports from the SSEB and the SSAC and concurred with the evaluation findings and recommendations. AR, Exh. 16, Phase Two Selection Memorandum at 3. The SSA identified seven offerors as the most highly qualified and invited those seven to submit phase two proposals.⁸ *Id.* at 5-10, 23-24. The SSA did not include Pacific as one of the most highly-qualified offerors invited to phase two. *Id.* at 24.

The agency notified Pacific that its phase one proposal was not one of the most highly-rated and would not proceed to phase two of the competition. AR, Exh. 17, Notification of Non-Selection. Pacific requested and received a written pre-award debriefing that explained the agency's rationale for the exclusion of its proposal from phase two of the competition. AR, Exh. 18, Pre-Award Debriefing. This protest followed.

DISCUSSION

Pacific challenges the agency's evaluation of its proposal under each of the evaluation factors and the exclusion of Pacific from phase two of the competition. Protest at 13-17. While we do not address every argument raised by Pacific, we have considered all of them and find that none provides a basis to sustain the protest.

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requires. AR, Exh. 9, RFP amend. 3, section 00 22 00 at 7. Ratings of "relevant" or "very relevant" required findings that the effort involved "similar" or "essentially the same" scope and magnitude of effort and complexities, respectively. *Id.*

⁸ Of note, six of the seven selected offerors had received a past performance rating of substantial confidence; the other offeror, a past performance rating of satisfactory confidence. Under the overall program management/technical approach factor, all of the selected offerors had received a technical/risk rating of outstanding. AR, Exh. 16, Phase Two Selection Memorandum at 23.

Past Performance Evaluation

Pacific challenges the agency's past performance evaluation, asserting that the evaluation was unreasonable and inconsistent with the solicitation's criterion. Protest at 13-15. In this regard, the protester claims that the agency evaluated its past performance references in a manner inconsistent with the solicitation and, in doing so, inexplicitly failed to give proper credit for its past performance references that demonstrated very recent, very relevant, and high magnitude of effort. Comments & Supp. Protest at 14. Had the agency evaluated its proposal consistent with the stated evaluation criteria, the protester argues that its proposal should have received a past performance rating of substantial confidence. See *generally*, Protest at 13-15; Comments & Supp. Protest at 13-16; Supp. Comments at 2-4. The agency counters that its evaluation of Pacific's past performance proposal was reasonable and consistent with the stated solicitation criterion. See *generally*, Memorandum of Law (MOL) at 7-10. Based on our review of the record, we find no basis to object to the agency's evaluation.

An agency's evaluation of past performance, which includes its consideration of the recency, relevancy, and quality of an offeror's performance references, is a matter within the contracting agency's discretion that we will not disturb unless the agency's assessments are unreasonable, inconsistent with the solicitation, or undocumented. *Teya Enters., LLC*, B-420907, Oct. 24, 2022, at 3-4; *Jacobs Tech., Inc.*, B-420016, B-420016.2, Oct. 28, 2021, at 5; *Metropolitan Interpreters & Translators, Inc.*, B-415080.7, B-415080.8, May 14, 2019, at 10. The evaluation of past performance by its very nature is subjective and we will not substitute our judgment for reasonably-based past performance evaluation ratings. *Nexsys Elecs. Inc., d/b/a Medweb*, B-419616.4, Jan. 7, 2022, at 5; *Pricewaterhouse Coopers Public Sector, LLP*, B-415504, B-415504.2, Jan. 18, 2018, at 10-11. The fact that the protester disagrees with the agency's evaluation judgments, without more, does not demonstrate that those judgments are unreasonable. *Trilogy Fed., LLC*, B-418461.11, B-418461.18, Feb. 23, 2021, at 5; *Cape Envtl. Mgmt., Inc.*, B-412046.4, B-412046.5, May 9, 2016, at 8.

Here, the evaluation record reflects that the SSEB fully considered the recency, relevancy, quality, and similarities and differences in size, scope, and complexity between Pacific's four references and the requirements being solicited here. See AR, Exh. 14, Revised SSEB Consensus Report at 38-40. As discussed above, recency would be evaluated with respect to projects that were completed within 10-years from the date that proposals were due, with projects having a more recent completion date having more impact on the overall past performance evaluation. AR, Exh. 9, RFP amend. 3, section 00 22 00 at 6.

As to relevancy, the RFP provided that relevancy would be evaluated for each submitted project to the extent the project demonstrated work similar to the specialized work requirements set forth in RFP section 01 11 00, including, but not limited to: complexity; nature of work; work elements; schedule duration; and scope. *Id.* at 7-8. The RFP further provided that the agency was to consider the extent to which a

submitted project met or exceeded a minimum contract/task order award value of \$1 million; the extent to which a submitted design-build project demonstrated how the offeror actively participated in the design and construction aspects; whether the project was performed by the prime offeror or a first-tier subcontractor; and whether the project was completed on a military installation. *Id.* at 7. As to quality, the agency's assessment of the offeror's performance would include performance evaluation ratings; responsiveness to customer concerns; cost growth and adherence to budget; time growth, timeliness, and adherence to schedule; quality and quality control measures; management of personnel and subcontractors; compliance with safety standards/safety plans; regulatory compliance; and overall customer satisfaction. *Id.* at 8.

In evaluating the work summary for Pacific's project 1, the SSEB noted that this prior effort was completed in April 2023, the project was performed on a military installation and exceeded \$1 million. Additionally, the SSEB found that this prior effort demonstrated Pacific's experience in performing two of the four specialized work requirements as described in the RFP. Based on these findings, the SSEB assessed project 1 as relevant. AR, Exh. 14, Revised SSEB Consensus Report at 38. As to the quality of the offeror's performance under this project, the record indicates that Pacific received ratings that were all satisfactory except for a very good rating for management. *Id.*; see also AR, Exh. 22, CPARS Project 1 at 2.

In evaluating the work summaries for projects 2, and 3, the evaluation record indicates that the evaluators found the projects to be recent as they were completed in May 2024 and February 2021, respectively. AR, Exh. 14, Revised SSEB Consensus Report at 38-39. The SSEB determined both projects were very relevant because these references (projects 2, and 3) were performed on military installations, exceeded \$1 million, and demonstrated the protester's prior experience in performing all four of the specialized work requirements contemplated by the RFP. *Id.* Under project 2, the protester's quality performance ratings were all exceptional. *Id.* at 39; see also AR, Exh. 23, PPQ Project 2 at 4. Under project 3, the quality performance ratings were all very good except for a rating of satisfactory for cost control. AR, Exh. 14, Revised SSEB Consensus Report at 39; see also AR, Exh. 24, CPARS Project 3 at 2.

The SSEB found the remaining reference (project 4) to be recent and somewhat relevant because, although the work was performed on a military installation and exceeded \$1 million, the prior work demonstrated Pacific's experience in only one of the four specialized work requirements. AR, Exh. 14, Revised SSEB Consensus Report at 39. As to the quality of performance under project 4, Pacific received a mix of ratings: 14 out of 26 were satisfactory; 9 out of 26 were very good; 2 out of 26 were exceptional for customer service; and one was a rating of not applicable. See AR, Exh. 26, PPQ Project 4 at 3-4.

Based on an overall assessment of the protester's references as documented by the SSEB, the agency assigned Pacific a past performance rating of satisfactory confidence. AR, Exh. 14, Revised SSEB Consensus Report at 38.

The protester's various protest submissions raise a salvo of challenges to the agency's evaluative assessments of its past performance. As one example, the protester argues that the agency failed to properly credit its references for meeting various solicitation requirements that should, in the protester's view, have been given dispositive weight. Pacific claims the assigned relevancy ratings were inconsistent with the solicitation as the four references should have been given greater consideration for relevancy, as required by the RFP and, as a result, Pacific should have been assigned a higher confidence rating. See Protest at 13-14; Comments & Supp. Protest at 13-16 (*citing* AR, Exh. 9, RFP amend. 3, section 00 22 00 at 7). The agency defends its past performance evaluation as reasonable and consistent with the terms of the solicitation. MOL at 8-10; Supp. MOL at 2-4.

As a few representative examples of the sub-arguments raised under this overarching objection, the protester argues that the agency failed to properly credit its references for materially exceeding the RFP's relevancy requirement that past performance references exceed \$1 million in awarded value, and for having been performed on military installations. This argument, however, reflects only the protester's disagreement as to the agency's relative consideration of the weight that such factors played in the assessment of relevancy. In this regard, the record unquestionably demonstrates that the agency acknowledged that all four references exceeded the \$1 million valuation requirement and were performed on military installations, and these were considered in conjunction with other enumerated considerations, most notably scope and complexity as compared to the RFP's specialized work requirements. Beyond its disagreement, the protester provides no basis for why the agency needed to elevate the importance of magnitude or place of performance over other expressly enumerated considerations, especially where the RFP explicitly stated that relevancy would be measured as compared to the RFP's specialized work requirements.

The protester also expresses its strong disagreement with the agency's evaluation of project 4, hardening of POL infrastructure, as somewhat relevant. According to the protester, the evaluators gave little or no consideration to the fact that project 4 was an "intensely POL/Fuel related" task order. Protest at 13. The agency contests Pacific's allegations, asserting that based on the description of the prior work performed under project 4, the evaluators reasonably concluded that this project consisted of somewhat relevant scope items to include construction. See COS at 6, MOL at 8.

As the agency explains, the solicitation specified that past performance references would be evaluated to determine the offeror's competence, depth, and breadth of experience as it relates to the RFP's specialized work requirements. See COS at 5; see *also* AR, Exh. 8, RFP amend. 3, section 00 21 00 at 12. Here, the portion of Pacific's past performance proposal entitled "Description of the Project" (4) stated as follows:

The project consisted of constructing a reinforced concrete blast structure over an existing fuel manifold, including site grading and paving, installing fencing, temporary relocation of existing manifold, new electrical service to hardened building, potable water, fire protection water, cathodic protection,

and a new Integrated Petroleum Distribution System (PDS) hose connection vault.

AR, Exh. 11, Pacific Proposal, Vol. 1, Past Performance at 10.

The record shows that the SSEB relied on the project 4 work summary description, quoted above, to determine that this design-bid-build reference demonstrated the protester's experience in performing only one of the four specialized work requirements (*i.e.*, paragraph 1 of section 01 11 00). See MOL at 8 (*citing* AR, Exh. 14, Revised SSEB Consensus Report at 39). In this regard, the agency explains that based on the project description included in the protester's proposal this appeared to be a blast structure project, as opposed to a fuels project as contemplated by the RFP, and the limited allusions to cleaning and inspections were insufficiently related to those areas included in the RFP's specialized work requirements. MOL at 8. The agency therefore concluded that this reference (project 4) merited a relevancy rating of somewhat relevant. AR, Exh. 14, Revised SSEB Consensus Report at 38. Although Pacific disagrees with the agency's judgments, its disagreement does not demonstrate that those judgments were unreasonable or otherwise provide a basis to sustain the protest. See *Trilogy Fed., LLC, supra*. Furthermore, it is an offeror's responsibility in a negotiated procurement to submit a well-written proposal with adequately detailed information which clearly demonstrates compliance with the solicitation and allows for a meaningful review by the agency. *Patriot Def. Grp., LLC*, B-418720.3, Aug. 5, 2020, at 7.

To the extent that the protester suggests that the agency should have inferred that project 4 satisfied additional specialized work requirements based on passing fragments from its proposal narrative, such argument is unpersuasive and fails to demonstrate that the agency's contemporaneous evaluation was unreasonable. On this record, we find no basis to sustain the protester's objections to the agency's evaluation of its past performance.

Overall Program Management/Technical Approach Evaluation

Finally, Pacific argues that the agency unreasonably evaluated its proposal under the overall program management/technical approach factor. The focus of the protester's arguments here is that its proposal should have received six unique strengths instead of just the two ultimately assigned by the SSEB. The protester also argues that the agency otherwise should have assigned a rating of outstanding rather than good under this factor based on the assessment of multiple strengths and no weaknesses. Protest at 16-17; Comments & Supp. Protest at 16-17.

The agency responds that it evaluated Pacific's proposal under the overall program management/technical approach factor reasonably and in accordance with the solicitation's evaluation criteria. COS at 7; MOL at 10-16; Supp. MOL at 4-5; *see also* AR, Exh. 9, RFP amend. 3, section 00 22 00 at 8.

As stated previously, the agency assigned Pacific's proposal a combined technical/risk rating of good based on the SSEB's assessment of two strengths and no weaknesses or deficiencies in its proposal. See AR, Exh. 14, Revised SSEB Consensus Report at 40. The evaluation record shows that Pacific's proposal was assigned a strength for providing a thorough explanation of its quality control organizational structure that explained the design components, clearly delineated roles and responsibilities, and flows of communications between the contractor, designer, and the government. See AR, Exh. 14, Revised SSEB Consensus Report at 40; MOL at 12. The SSEB assigned a second strength under this factor based on Pacific's management approach demonstrating its in-house capabilities to successfully perform multiple concurring task orders with the SSEB noting Pacific's "hub and spoke" approach that will provide a workforce of 564 technical personnel located at regional offices located throughout the contract footprint. See *id.*

Pacific's arguments regarding the number of unique assigned strengths, the relative weight assigned to such strengths, and the ultimate adjectival rating assigned to its protest fail to state persuasive bases of protest because they "quintessentially elevate form over substance." *SMS Data Prods. Grp.*, B-418925.2 *et al.*, Nov. 25, 2020, at 7. As we have repeatedly recognized, an agency's judgment of whether to assess unique strengths is a matter within the agency's discretion and one that we will not disturb where the protester has failed to demonstrate that the evaluation was unreasonable or inconsistent with the applicable evaluation criteria. *Id.* at 6. The protester's arguments as to the number of strengths assigned only challenges the summary level assessments (e.g., number or significance of strengths, adjectival ratings) used by the agency, without demonstrating that the agency's underlying evaluation was unreasonable or inconsistent with the solicitation's evaluation criteria. We have repeatedly explained that these types of summary level assessments are merely guides to, and not a substitute for, intelligent decision making. In this regard, where an agency reasonably considers the underlying bases for the ratings, including advantages or disadvantages with the specific content of competing proposals, in a manner that is fair and equitable and consistent with the solicitation's terms, a protester's disagreement over the summary level assessments is essentially inconsequential in that it does not affect the reasonableness of the judgments made in the source selection decision. *Environmental Chem. Corp.*, B-416166.3 *et al.*, June 12, 2019, at 12.

We similarly find no merit to Pacific's argument that the agency erred in not rating its overall program management/technical approach proposal as good based on the two assessed strengths and no assessed weaknesses, or deficiencies. Agencies have considerable discretion in making subjective judgments about the technical merit of proposals, and technical evaluators are given the discretion to decide whether a proposal "deserves a 'good' as opposed to 'very good' rating." *JAM Corp.*, B-408775, Dec. 4, 2013, at 4 (quotation omitted). Moreover, it is well established that adjectival descriptions and ratings serve only as a guide to, and not a substitute for, intelligent decision-making. *PAE-Parsons Global Logistics Servs., LLC--Advisory Opinion*, B-417506.13, Oct. 18, 2019, at 15. Where an agency reasonably considers the underlying bases for the ratings, including advantages and disadvantages associated

with the specific content of competing proposals in a manner that is fair and equitable and consistent with the terms of the solicitation, a protester's disagreement over the actual adjectival or color rating assigned is essentially inconsequential in that it does not affect the reasonableness of the judgments made in the source selection decision. *Id.*

Here, the record reflects that the agency did not merely rely on the assigned adjectival ratings, but, rather, the agency thoroughly considered the relative merits of the proposals based on the underlying evaluation findings. As recounted above, the record shows that both the SSAC's recommendation and the SSA's phase one decision carefully considered the underlying qualitative differences between the offerors' proposals. See *generally* AR, Exh. 15, SSAC Report; Exh. 16, Phase Two Selection Memorandum. On this record, Pacific's disagreement with the adjectival rating assigned to its proposal, without more, provides no basis to object to the agency's evaluation.

The protest is denied.

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General Counsel