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U.S. Immigration and Customs Enforcement

Justification and Approval (J&A) for Other than Full & Open Competition

Pursuant to the requirements of 41 U.S.C. §3304(a)(1) Competition in Contracting Act of 1984 (CICA) as implemented by FAR Subpart 6.302-1 and in accordance with the requirements of FAR Subpart 6.303-1, the justification for the use of the statutory authority under FAR Subpart 6.3 is justified by the following facts and rationale required under FAR Subpart 6.303-2:

1. Agency and Contracting Activity.

The requiring activity is the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI).

The contracting activity is:

U.S. Department of Homeland Security (DHS)
U.S. Immigration and Customs Enforcement (ICE)
Information Technology Division
801 I Street, NW
Washington, DC 20536

2. Nature and/or Description of the Action being Approved.

The name of the proposed vendor is:

Palantir Technologies
100 Hamilton Avenue, Suite 300
Palo Alto, CA 94301

This procurement will acquire an exclusive firm-fixed price Gotham Unlimited License from Palantir Technologies. The base term of the license is 12 months; however, ICE will include options for two additional 12-month terms as well as a 6-month license term under this procurement. The Palantir Gotham Unlimited License includes at no additional cost hardware necessary for server core additions, a perpetual license for Gotham software, unlimited operations and maintenance support of the FALCON system, , and development of five new features and/or data set additions annually, as the parties may negotiate. (Hardware will be provided as necessary to maintain current benchmarks of system performance as FALCON is expanded with new users, new functionalities, and new data sets.)

3. Description of Supplies/Services.

(b)(7)(E)

4. Identification of Statutory Authority Permitting Other Than Full and Open Competition.

The statutory authority permitting other than full and open completion is 41 U.S.C 3304(a)(1) implemented by Federal Acquisition Regulation (FAR subpart 6.302-1 entitled "Only One Responsible source and no other supplies or services will satisfy agency requirements. ICE intends to enter into this contract with Palantir Technologies.

5. Demonstration that the Nature of the Acquisition Requires Use of the Authority Cited.

Due to the FALCON system being based upon proprietary software developed by Palantir Technologies and the fact that Palantir Technologies does not license or authorize any third-party vendors to offer operations and maintenance or support or development of its products, this will be a sole source acquisition.

FALCON is based upon Palantir Gotham, a proprietary Commercially Available, Off-the-Shelf (COTS) software product produced and sold solely by Palantir Technologies. Palantir's Gotham software has been modified for ICE's specific requirements and has been internally renamed as FALCON.

Palantir is the only source for the proposed license to use and support the FALCON system. FALCON is based on Palantir's proprietary Gotham software suite. Only Palantir has access to the system's source components and underlying software. The Palantir Gotham Unlimited License will allow ICE to maintain and update current databases with the most accurate information for the additional end users. Since the Palantir software products are proprietary, Palantir has stated that Palantir is the only authorized seller and distributor of its software products and provider of any required maintenance services for its software. Palantir is unwilling to license other sources to support the FALCON system and as discussed below, it is not practicable or economically feasible for ICE to acquire sufficient data rights to compete an alternative to the FALCON system at this time.

6. Description of Efforts Made to Ensure that Offers are Solicited from as Many Potential Sources as is Practicable.

The Contracting Officer (CO) issued sources sought notices that detailed program requirements for a comprehensive software solution and related support, and requested that interested vendors submit technical capability documentation in response. No vendors responded to the notification. As a result of these sources sought notices, Palantir software was procured under a fixed price award HSCETE-11-F-00125 followed by a maintenance support bridge contract award number HSCETC-13-F-00010. A new contract, HSCETC-13-F-00030, with Palantir was awarded on June 14, 2013. As market research revealed, Palantir, Inc., is the sole source of Palantir Gotham software. Palantir does not currently authorize, license, or certify any third-party vendors to provide support services for their Gotham software.

7. Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable.

The contracting officer has determined that the anticipated price will be fair and reasonable based on an evaluation of Palantir's commercial pricing data. The contracting officer will also compare Palantir's price to individual items on Palantir's GSA Schedule and the IGCE to determine price reasonableness.

8. Description of Market Research, as required by FAR Part 10.

(b)(7)(E)

9. Any Other Facts Supporting the Use of Other Than Full and Open Competition.

In order to meet the mission needs of HSI, ICE needs to retain the FALCON capabilities and expand the functionality and user base of the product.

ICE/HSI Information Sharing and Infrastructure Management’s (ISIM) shall continue to monitor available software products and review HSI operating procedures to determine if any additional software products become available that more effectively and efficiently meet functional requirements. The structure of the current procurement with its three optional license terms, allows for multiple doorways into alternative procurements as FALCON ages and ICE HSI’s analytics needs to evolve. ICE’s chosen architecture moving forward (the forthcoming use of the ICE Big Data Environment, or BDE, to house the majority of its law enforcement-related data sets, which can potentially be hooked into any of a number of alternative front-end applications) will allow for open competition for an analytics platform if ICE management decides to replace or rework its existing analytics platform.

10. A Listing of the Sources, if any That Expressed in Writing an Interest in the Acquisition.

ICE-HSI has determined that only Palantir can provide the supplies and services required by the program office; therefore, it has been determined that Palantir is the sole source vendor for the proprietary software license. In accordance with FAR 5.201, the CO will synopsise this requirement to the Federal Business Opportunities (FBO) website, which is the Government-wide Point of Entry (GPE). Any responses will be evaluated by the Program Management Office and considered by the Contracting Office.

11. A Statement of the Actions, if any, the Agency May Take to Remove or Overcome Any Barriers to Competition Before Any Subsequent Acquisition for Supplies or Services Required.

In order to meet the mission needs of HSI, ICE retained the Palantir capabilities in order to expand the functionality and user base of the product. ICE/HSI/MS/LESIM shall continue to monitor available software products and review HSI operating procedures to determine if any additional software products become available that more effectively and efficiently meet functional requirements.

12. Certifications

I certify that the facts and representations under my cognizance, which are included in this justification, meet the Government’s minimum need and that the supporting data, which forms a basis for this justification, is accurate and complete to the best of my knowledge and belief.

Technical/Requirements Personnel Certification:

Christopher Moman

Date

Contracting Officer:

I hereby certify, in accordance with FAR 6.303-1(a)(2) as the Contracting Officer that this justification for other than full and open competition is accurate and complete to the best of my knowledge and belief.

M. L. McDaniel, Contracting Officer

Date

REVIEW:

Cheri Tyner, ICE Competition Advocate

Date

APPROVAL:

J. William Weinberg, Head of Contracting Activity

Date



U.S. Immigration
and Customs
Enforcement

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FALCON OPERATIONS & MAINTENANCE SUPPORT & SYSTEM ENHANCEMENT Performance Work Statement

(amended)

May 2, 2016

Homeland Security Investigations (HSI)

Mission Support



Homeland
Security

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U.S. Immigration
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Enforcement

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FALCON OPERATIONS & MAINTENANCE SUPPORT & SYSTEM ENHANCEMENT Performance Work Statement

May 11, 2015

Homeland Security Investigations (HSI)

Mission Support



Homeland
Security

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