JUSTIFICATION AND APPROVAL  
FOR OTHER THAN FULL AND OPEN COMPETITION

1. **CONTRACTING AGENCY:** Kansas City District, U.S. Army Corps of Engineers, Contracting Division, 601 E. 12th Street, Kansas City, MO 64106

2. **DESCRIPTION OF ACTION:** This action is a new single source requirement for the procurement of a Knox Box to accommodate the Fire Alarm system. The Knox Box will be procured and installed as part of a firm-fixed price design build construction contract. This procurement is being funded with FY 19 or FY 20 MILCON funds for approximately

3. **DESCRIPTION OF SUPPLIES/SERVICES OR NATURE OF CONSTRUCTION:**
The U.S. Army Corps of Engineers, Kansas City District, requires this partial sole source action for the purchase of one Knox Box, a high-security key box system by the selected Design-Build awarded constructor. The estimated value of this procurement is approximately installed as part of the total Fort Leonard Wood Replacement Program. The action is a firm fixed price, design-build construction contract with an estimated period of performance of 4+ years. Options and continuation services clauses are not applicable to this action.

4. **AUTHORITY CITED:** *FAR 13.106-1(b), Soliciting from a single source.*

5. **REASON FOR AUTHORITY CITED:**
   a. **BACKGROUND:** The Fire Department is in the process of standardizing security entrance boxes for the installation at Fort Leonard Wood. For the past ten years, the only type in use is the proprietary “Knox Box” systems.

   Fort Leonard Wood (FLW) adopted a Rapid Entry System Policy utilizing the "Knox Box" key box system in 2009. There are currently 205 Knox Box’s installed on FLW facilities. These buildings were chosen based on several factors including after hour fire department response (199 Monitored by FAS & 6 not monitored). There are an additional 224 Facilities, tied to Fire Alarm system that the FD recommends Knox Box’s be installed on.

   A Knox Box is a high-security key box system, designed to give firefighters and emergency services immediate access to locked buildings, elevators, and other secured areas. When hooked to the Fire Alarm system, the Knox Box will send a supervisory alarm to “E-911” when someone opens the door to the Knox Box. The Knox-Box Rapid Entry System provides non-destructive emergency access. Many DoD installations use Knox Key Boxes for safe and secure rapid entry into buildings, after duty hours, or where keys are required to access buildings to minimize property loss and speedy entry of first responders. Delays in the fire department gaining rapid entry reduces the occupants chance of survival in a fire, the chances for substantial property damage increases because of delays in gaining entry to the structure and fire fighter safety and survival may be compromised because of delays.

   b. **JUSTIFICATION:** Installation of a Knox-Box allows firefighters faster access in case of an emergency, prevents expensive forcible entry should emergency services be required while the premises are unoccupied. Costly front doors and entry ways needn't be
harmed if entry keys are available on-site. Delays in the fire department gaining rapid entry reduce the occupants’ chance of survival in a fire, increase the chance for substantial property damage due to delays in gaining entry and fire fighter safety and survival may be compromised. Designed for maximum protection, each virtually indestructible box features a special high-security Medeco lock and key. This Medeco restricted locking system guards against unauthorized key duplication. Keys aren't even available to locksmiths or lock distributors. Only the Knox Company can supply these keys! Each installation has their own exclusive key code. All Knox-Box stations on that installation are keyed alike. FLW has their own key code and only the FD has master keys. On FLW, master keys are secured on our fire apparatus and are accessed with only a key access code. The Knox Box units are a commercial off-the-shelf item available to the general public in the same form as provided to the Government. As such, there should be no impact on the required delivery of the FTLW Hospital replacement.

References provided by the FTLW Fire Chief, Kevin Curtis, who is directing the continued use of Knox Boxes and reviewed by the FTLW Hospital team included: --

i.) In accordance with AR 190-51, Page 55, D-6. Rapid-entry key boxes:

   a. Emergency personnel such as police and firefighters will be provided card keys, key codes, lock combinations, keys or other similar entry control devices needed to enter facilities.

   b. Entry control devices (e.g., key, card, access code record) may be secured in a rapid-entry key box affixed to the exterior of the facility or adjacent to it to avoid emergency personnel having to maintain a large amount of entry control devices.

   c. Rapid-entry key box specifications will meet-

      (1) Underwriters Laboratory standards 437, 1037, 1332, and 1610.
      (2) A factory mutual equivalency to the UL standards.
      (3) A nationally recognized test laboratory equivalency to the UL standards.
      (4) Organizations outside the continental United States will employ a local equivalency per the status of forces agreement.

ii.) NFPA 1: Access Box(s) and FDC's:

   Chapter 3.3.2. An approved secure box, accessible by the authority having jurisdiction's master key control, containing entrance keys or other devices to gain access to a structure or area.

   Chapter 18.2.2.1. The AHJ shall have the authority to require an access box(s) to be installed in an accessible location where access to or within a structure of area is difficult because of security. The access box(s) shall be of an approved type listed in accordance with UL 1037.

iii.) International Fire Code:

   Chapter 2 Definitions:

   Fire Department Master Key - A limited issue key of special or controlled design to be carried by fire department officials in command which will open key boxes on specified properties.
Key Box - A secure device with a lock operable only by a fire department master key, and containing building entry keys and other keys that may be required for access in an emergency.

Section 506 Key Boxes - Where access to or within a structure or an area is restricted because of secured openings or where immediate access is necessary for life-saving or fire-fighting purposes, the fire code official is authorized to require a key box to be installed in an approved location. The key box shall be of an approved type listed in accordance with UL 1037, and shall contain keys to gain necessary access as required for the fire code official.

Section 506.1.1. Locks. An approved lock shall be installed on gates or similar barriers when required by the fire code official.

c. IMPACT: The Fire Department is actively standardizing security entrance boxes on FTLW and the approved standard system is Knox Box. It is imperative that all new lock boxes provided continue using the Knox Box brand for the following reasons:

   (1) Fort Leonard Wood has a Knox Box computer program up and running, that provides security for Access Boxes that hold the facility Knox Box keys.

   (2) Using a different company’s equipment would result in a greater expense, due to two separate systems that the fire department would have to keep track of with no guarantee of compatibility with the system in place. Using a different vendor would result in additional expenses in funding additional vehicle Access Boxes ($10.8K), as well as requiring two separate computer programs to manage both systems, and increase the likelihood of loss of property and/or life in the event of an emergency.

d. ALTERNATIVES: None. The Knox Company is the sole inventor, manufacturer, and supplier of the Knox Rapid Entry System. The Knox Company uses no distributors to sell their products. All products are sold factory direct to the end user.

6. EFFORTS TO OBTAIN COMPETITION: None. The request is for an existing system that is utilized at the Fort Leonard Wood Installation. The manufacturer, The Knox Company, had been previously contacted and confirmed that they have no authorized distributors.

7. ACTIONS TO INCREASE COMPETITION: None – Adding to an existing system adopted by Army Regulation 190-51 – Military Police - Security of Unclassified Army Resources (Sensitive and Nonsensitive) for the Fort Leonard Wood Installation. See Section D-6.- Rapid Entry Key Boxes.

8. MARKET RESEARCH: In accordance with FAR Part 10, Market research was reviewed and updated in December 2018 by reviewing available product literature published by manufacturers, distributors, and dealers available on-line utilizing searches of “Knox Box, “emergency personnel lock boxes” and the information and literature posted on knoxbox.com. In addition, fbo.gov was searched for other sources sought and J&A postings for the same requirement. These included a sources sought announcement from USACE Alaska district in 2018 and an approved J&A from 2015 from RAF Alconbury for the Knox Box Systems.

The research demonstrated that there were only a few authorized network management software suites and the Knox Box best met the requirements for both scalability and size with the appropriate built in tools to accomplish the mission. The provision of an alternative Open Market or GSA security system would compromise the existing System by the additional need to obtain,
secure, and track additional keys with the resultant risk to confusion and delay during an emergency response giving rise to risk to life and Government Property.

In addition, Market Research was originally conducted in 2009 to find the best system for the Fort Leonard Wood Installation. The customer attempted to ascertain whether any other qualified sources could fulfill the requirement for a Rapid Entry Key System. There were no other available sources of supply on the market for a similar system with secure, limited access. General Electric revealed that the other key boxes were combination-operated which could not be secured. The Knox Company is the only authorized distributor of the Knox-Box, with sole propriety of the Knox Master Keys and associated key codes. It is critical to remain with The Knox Company to ensure compatibility and guarantee the security of the Knox System to continue to enable reduced response time, property damage and the liability for lost keys. There are no other qualified sources capable of satisfying this subject requirement.

9. INTERESTED SOURCES:

THE KNOX COMPANY
1601 W. Deer Valley Road
Phoenix, AZ 85027

To date, no other sources have expressed an interest in writing. However, all offers received shall be considered. The notices required by FAR 5.201 shall be published and any bids or proposals received shall be considered.

This J&A will be synopsized on fbo.gov with the following information: “The proposed contract action is for supplies or services for which the Government intends to require from only one source under the authority of FAR 6.302. Interested persons may identify their interest and capability to respond to the requirement or submit proposals. This notice of intent is not a request for competitive proposals. However, all proposals received within forty-five days after date of publication of this synopsis will be considered by the Government.” A determination by the Government not to compete with this proposed contract based upon responses to this notice is solely within the discretion of the Government. Information received will normally be considered solely for the purpose of determining whether to conduct a competitive procurement.

10. TECHNICAL CERTIFICATION:

I certify that the supporting data under my cognizance which are included in the justification are accurate and complete to the best of my knowledge and belief.

NAME: Kelly Miller
TITLE: Program Manager
DATE: 15 February 2019
SIGNATURE: [Redacted]

11. DETERMINATION:

I certify that the information supporting this single source determination is accurate and complete to the best of my knowledge based on the supporting data provided by technical or requirements personnel and my own research. I hereby determine the circumstances of this contract action deem only one source reasonably available due to compatibility issues with the current Fort Leonard Wood Knox Box system. The previous J&As for Knox Box system have been approved in the past at various DoD locations and there is very little risk to this requirement to approve the
sole source determination for the Knox Boxes required to be purchased and constructed within the firm fixed price, design-build contract.

I hereby determine that the anticipated cost or price to the Government for this contract action will be fair and reasonable in accordance with FAR 13.106-3(a) (1) based on competition between offerors for the larger Design-Build construction solicitation.

NAME: Lacy Kay
TITLE: Contracting Officer
DATE: 15 February 2019
SIGNATURE: ____________
Based on the foregoing justification, I hereby approve the procurement Knox Boxes for the Fort Leonard Wood Hospital Replacement project on an other than full and open competition basis pursuant to the authority of FAR 13.106-1(b) Soliciting from a single source, subject to the availability of funds, and provided the products and construction herein described have otherwise been authorized for acquisition.

NAME: Lacy Kay  DATE: 15 February 2019
TITLE: Contracting Officer  SIGNATURE: KAY.LACY.1384539404