

**From:** Young, Kristin  
**To:** [Cunningham, Monica](#)  
**Cc:** [Stevenson, Jennifer](#); [Shelley Hartmann](#); [Bowman, Randal](#); [Andrew W Havelly](#); [timothy\\_wight@ios.doi.gov](#); [sylvia\\_burns@ios.doi.gov](#); [Oluwarotimi Abimbola](#); [Marcia Cash](#); [Bruce Downs](#); [Lawrence Ruffin@ios.doi.gov](#); [teri\\_barnett@ios.doi.gov](#); [Eichenbaum, Louis](#); [williemae\\_johnson@fws.gov](#); [Marilyn Brower](#); [Sirotzky, Pamela](#); [Julie Spano](#); [Tina Campbell](#); [Sharon Roberts](#); [Brendon Johnson](#)  
**Subject:** Re: Update on DiscoverText procurement (was Re: Invitation: Discuss DiscoverText @ Thu May 11, 2017 7:30am - 8am (andrew\_havelly@ios.doi.gov))  
**Date:** Monday, May 15, 2017 3:15:07 PM  
**Attachments:** [SOW for DiscoverText Contract Services - 5.12.17 revised clean.docx](#)  
[Texifter LLC PO.pdf](#)

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All - After conversations with Sharon Roberts, BPC for OS/IBC, we both agree having her office issue a new order for these services will be faster and more streamlined than having FWS issue a modification (a mod would require an IAA, adding an extra layer to the process requiring more time). The licenses will still be used as part of the FWS Contract (no mod needed) but the need for services in the amount of \$5,800 will be awarded as a new purchase order to the same vendor. Sharon and her team have reviewed the sow along with our existing PO and believe they can have this awarded before the end of the week (both are attached).

Sharon - As part of this email chain the funding to be used is listed below. I'm not sure who creates the PR's but they'll need this info.

The SIO's line of accounting is:

Cost Center: DS10100000  
Funct. Area: DLSN00000.000000  
WBS: DX10101  
Fund: 178D0102DM

Going forward if anyone has additional questions feel free to reach out. Assuming Marcia and Tina will continue to be looped in from FWS but the contracting POC's do not need to be unless other questions come up.

Thanks so much and sorry I couldn't close this out on Friday.

Kristin Young  
Chief, Division of Contracting and General Services  
Bureau Procurement Chief  
Office: (703) 358-2176 Cell: (703) 517-1279

On Fri, May 12, 2017 at 10:03 AM, Cunningham, Monica  
<[monica\\_cunningham@ios.doi.gov](mailto:monica_cunningham@ios.doi.gov)> wrote:

The SIO's line of accounting is:

Cost Center: DS10100000  
Funct. Area: DLSN00000.000000  
WBS: DX10101  
Fund: 178D0102DM

On Fri, May 12, 2017 at 12:45 PM, Stevenson, Jennifer <[jennifer\\_stevenson@ios.doi.gov](mailto:jennifer_stevenson@ios.doi.gov)> wrote:

Hi,

Julie Spano or Monica Cunningham has the funding code. I'm copying them in on the email so they can provide that to you.

Jennifer

**Jennifer Stevenson**

OS Print Services Specialist

US Department of the Interior

Assistant Secretary for Policy, Management & Budget

Office of the Chief of Staff

Business and Administrative Division

1849 C Street NW - Room 5013

Washington, DC 20240

Office (202)-208-3169

[jennifer\\_stevenson@ios.doi.gov](mailto:jennifer_stevenson@ios.doi.gov)

On Fri, May 12, 2017 at 12:21 PM, Shelley Hartmann <[shelley\\_hartmann@fws.gov](mailto:shelley_hartmann@fws.gov)> wrote:

So we can't process as a PR as I thought. We will need to do an IAA or use One of our RSAs to add funds for this.

Shelley Hartmann

Deputy ADIR

703-358-2004

202-412-5602

On May 12, 2017, at 12:17 PM, Bowman, Randal <[randal\\_bowman@ios.doi.gov](mailto:randal_bowman@ios.doi.gov)> wrote:

I thought the funding was arranged, but had to leave the Thursday meeting before it was concluded. Jennifer is out today but is checking email periodically, and I will see if I can reach her by phone.

On Fri, May 12, 2017 at 12:11 PM, Andrew W Havelly <[andrew\\_havelly@ios.doi.gov](mailto:andrew_havelly@ios.doi.gov)> wrote:

All,  
FWS have confirmed that they can modify their contract for DiscoverText to include the additional labor components indicated on Marcia's market research quote.

Jennifer, Randal: in order to proceed, FWS will need a funding code... you'll find the FWS team CCed on this email.

Marcia and survey response team: I think it is wise to review the modification in order to ensure that the licensing and services you require are fully included before you execute (and so that you understand the cost)!

Thanks, all! I will follow up separately with our Information Assurance teams on next steps on that front.

-andrew



**Andrew W Havely** Chief Technology Officer  
US Department of the Interior | Office of the Chief Information  
Officer  
[andrew\\_havely@ios.doi.gov](mailto:andrew_havely@ios.doi.gov) | Office: [303.236.7011](tel:303.236.7011) |  
Cell: [303.717.2509](tel:303.717.2509)  
[www.doi.gov/ocio](http://www.doi.gov/ocio)

From: Oluwarotimi Abimbola <[oluwarotimi\\_abimbola@ios.doi.gov](mailto:oluwarotimi_abimbola@ios.doi.gov)>  
Reply: Oluwarotimi Abimbola <[oluwarotimi\\_abimbola@ios.doi.gov](mailto:oluwarotimi_abimbola@ios.doi.gov)>  
Date: May 10, 2017 at 3:30:52 PM  
To: [andrew\\_havely@ios.doi.gov](mailto:andrew_havely@ios.doi.gov) <[andrew\\_havely@ios.doi.gov](mailto:andrew_havely@ios.doi.gov)>,  
[timothy\\_wight@ios.doi.gov](mailto:timothy_wight@ios.doi.gov) <[timothy\\_wight@ios.doi.gov](mailto:timothy_wight@ios.doi.gov)>,  
[randal\\_bowman@ios.doi.gov](mailto:randal_bowman@ios.doi.gov) <[randal\\_bowman@ios.doi.gov](mailto:randal_bowman@ios.doi.gov)>,  
[jennifer\\_stevenson@ios.doi.gov](mailto:jennifer_stevenson@ios.doi.gov) <[jennifer\\_stevenson@ios.doi.gov](mailto:jennifer_stevenson@ios.doi.gov)>,  
[Lawrence\\_Ruffin@ios.doi.gov](mailto:Lawrence_Ruffin@ios.doi.gov) <[Lawrence\\_Ruffin@ios.doi.gov](mailto:Lawrence_Ruffin@ios.doi.gov)>,  
[teri\\_barnett@ios.doi.gov](mailto:teri_barnett@ios.doi.gov) <[teri\\_barnett@ios.doi.gov](mailto:teri_barnett@ios.doi.gov)>,  
[marcia\\_cash@fws.gov](mailto:marcia_cash@fws.gov) <[marcia\\_cash@fws.gov](mailto:marcia_cash@fws.gov)>  
Cc: [sylvia\\_burns@ios.doi.gov](mailto:sylvia_burns@ios.doi.gov) <[sylvia\\_burns@ios.doi.gov](mailto:sylvia_burns@ios.doi.gov)>  
Subject: Invitation: Discuss DiscoverText @ Thu May 11, 2017 7:30am -  
8am ([andrew\\_havely@ios.doi.gov](mailto:andrew_havely@ios.doi.gov))

### Discuss DiscoverText

[more details »](#)

Meet to discuss the use of existing FWS contract for DiscoverText

When Thu May 11, 2017 7:30am – 8am Mountain Time

Where (b) (5) CIP OS-OCIO Sweet Gum Conference  
Room 7115 MIB ([map](#))

Video call (b) (5) CIP

Calendar [andrew\\_havely@ios.doi.gov](mailto:andrew_havely@ios.doi.gov)

Who

- [oluwarotimi\\_abimbola@ios.doi.gov](mailto:oluwarotimi_abimbola@ios.doi.gov) - organizer
- [andrew\\_havely@ios.doi.gov](mailto:andrew_havely@ios.doi.gov)
- [timothy\\_wight@ios.doi.gov](mailto:timothy_wight@ios.doi.gov)
- [randal\\_bowman@ios.doi.gov](mailto:randal_bowman@ios.doi.gov)
- [jennifer\\_stevenson@ios.doi.gov](mailto:jennifer_stevenson@ios.doi.gov)
- [Lawrence\\_Ruffin@ios.doi.gov](mailto:Lawrence_Ruffin@ios.doi.gov)
- [teri\\_barnett@ios.doi.gov](mailto:teri_barnett@ios.doi.gov)
- [marcia\\_cash@fws.gov](mailto:marcia_cash@fws.gov)
- [sylvia\\_burns@ios.doi.gov](mailto:sylvia_burns@ios.doi.gov) - optional

Going?

[Yes](#) - [Maybe](#) - [No](#) [more options »](#)

Invitation from [Google Calendar](#)

You are receiving this email at the account [andrew\\_havely@ios.doi.gov](mailto:andrew_havely@ios.doi.gov) because you are subscribed for invitations on calendar [andrew\\_havely@ios.doi.gov](mailto:andrew_havely@ios.doi.gov).

To stop receiving these emails, please log in to <https://www.google.com/calendar/> and change your notification settings for this calendar.

Forwarding this invitation could allow any recipient to modify your RSVP response. [Learn More](#).

--  
**Monica Cunningham**  
**Program Analyst**  
Office of Policy, Management & Budget  
Business & Administrative Division

**wk: 202-208-3294**  
**office cell: 202-295-7256**  
**fax: 202-208-3633**

## Statement of Work for DiscoverText Assistance

The Department of the Interior needs assistance with comment management for a Notice published in the Federal Register on May 11, 2017. The Notice has two separate comment periods. The first comment period ends on May 26, 2017, and the second comment period ends on July 10, 2017. The Department of the Interior expects to receive a large number of public comments beginning immediately for both comment periods and requires support organizing and reviewing these comments.

The Department plans to use the U. S. Fish and Wildlife Service's existing DiscoverText contracted licenses and software to analyze the comments, but requires additional contract support to facilitate organizing, reviewing, and analyzing the public comments received. Below is a brief summary of the requirements:

This initiative includes:

- Assisting FWS/DOI Subject Matter Experts (SMEs) in the planning and deployment of comment review.
- Providing graduate students to prepare the preliminary data at the vendor's direction and sorting multiple iterations of bulk extract records from the Federal Docket Management System (FDMS).
- Briefing and training DOI Subject Matter Experts on best practice approaches to developing coding protocols to organize the records contained in bulk extracts.
- Ensuring proper and continuous functioning of DiscoverText throughout the project including the following.
  - Upload FDMS Bulk Extracts into DiscoverText.
  - To keep up with the workload, bulk extracts will be provided multiple times per week. The vendor will prepare "buckets" and "datasets" from these extracts making sure there are no omissions or overlaps. Deduplication should be performed on each extract.
  - Vendor will manage DOI user credentials, granting access to DiscoverText as requested by DOI.
  - The vendor will provide guidance on best practices for creating and using "buckets" to achieve the desired analysis ability.
  - The vendor will advise DOI on nomenclature of "buckets" and "datasets", and any other relevant subsets, so SMEs understand where their records can be found.
  - The goal of this pre-processing work is that the "starting point" for the SMEs is only to open the dataset assigned to that person and begin coding.
  - Vendor will also provide guidance on the most efficient use of DiscoverText, including identifying where "annotations" made by all SMEs can be found, how to add/edit codes, and any other DiscoverText tool that will assist the effort.
  - Once the records are coded, Vendor will assist in preparing management reports.

The support effort estimate is included below:

Labor	Hourly Rate	Hours	Total
Project Manager	\$175	20	\$3290*
Graduate Students	\$25	100	\$2500
<b>Total</b>			<b>\$5790</b>

\*includes GSA discount

## ORDER FOR SUPPLIES OR SERVICES

PAGE OF PAGES

1

3

IMPORTANT: Mark all packages and papers with contract and/or order numbers.

1. DATE OF ORDER 03/14/2017		2. CONTRACT NO. (If any) GS-35F-002CA		6. SHIP TO:			
3. ORDER NO. F17PD00383		4. REQUISITION/REFERENCE NO. 0040314065		a. NAME OF CONSIGNEE FWS DIV OF PLCY AND DIRCTVS MGMT			
5. ISSUING OFFICE (Address correspondence to) FWS, DIV OF CONTRACTING AND FA 5275 Leesburg Pike MS: BMO Falls Church VA 22041-3803				b. STREET ADDRESS 5275 Leesburg Pike MS: BPHC			
				c. CITY Falls Church	d. STATE VA	e. ZIP CODE 22041-3803	
7. TO: ATTN GOVERNMENT POC				f. SHIP VIA			
a. NAME OF CONTRACTOR TEXIFTER, LLC				8. TYPE OF ORDER			
b. COMPANY NAME				<input type="checkbox"/> a. PURCHASE			
c. STREET ADDRESS 237 SHUTESBURY RD.				REFERENCE YOUR:			
d. CITY AMHERST				e. STATE MA			
				f. ZIP CODE 01002-1267			
9. ACCOUNTING AND APPROPRIATION DATA See Schedule				10. REQUISITIONING OFFICE FWS DIV OF PLCY AND DIRCTVS MGMT			
11. BUSINESS CLASSIFICATION (Check appropriate box(es)) <input checked="" type="checkbox"/> a. SMALL <input type="checkbox"/> b. OTHER THAN SMALL <input type="checkbox"/> c. DISADVANTAGED <input type="checkbox"/> d. WOMEN-OWNED <input type="checkbox"/> e. HUBZone <input type="checkbox"/> f. SERVICE-DISABLED VETERAN-OWNED <input type="checkbox"/> g. WOMEN-OWNED SMALL BUSINESS (WOSB) ELIGIBLE UNDER THE WOSB PROGRAM <input type="checkbox"/> h. EDWOSB						12. F.O.B. POINT Destination	
13. PLACE OF a. INSPECTION Destination		b. ACCEPTANCE Destination		14. GOVERNMENT B/L NO.		15. DELIVER TO F.O.B. POINT ON OR BEFORE (Date)	
						16. DISCOUNT TERMS PP30	
17. SCHEDULE (See reverse for Rejections)							
ITEM NO. (a)	SUPPLIES OR SERVICES (b)			QUANTITY ORDERED (c)	UNIT (d)	UNIT PRICE (e)	
	:PPR# 15036 Legacy Doc #: FWS  Continued ...						
18. SHIPPING POINT		19. GROSS SHIPPING WEIGHT		20. INVOICE NO.		17(h) TOTAL (Cont. pages)	
21. MAIL INVOICE TO						\$94,710.33	
a. NAME Invoice Processing Platform System							
b. STREET ADDRESS (or P.O. Box) US Department of Treasury http://www.ipp.gov							
c. CITY						\$94,710.33	17(i) GRAND TOTAL
d. STATE							
e. ZIP CODE							

22. UNITED STATES OF  
AMERICA BY (Signature)

MICHAEL COGHILL

Digitally signed by MICHAEL  
COGHILL  
Date: 2017.03.15 14:03:03 -04'00'23. NAME (Typed)  
Michael Coghill  
TITLE CONTRACTING/ORDERING OFFICER

**ORDER FOR SUPPLIES OR SERVICES**  
**SCHEDULE - CONTINUATION**

PAGE NO

2

**IMPORTANT:** Mark all packages and papers with contract and/or order numbers.

DATE OF ORDER

CONTRACT NO.

ORDER NO.

03/14/2017

GS-35F-002CA

F17PD00383

ITEM NO (a)	SUPPLIES/SERVICES (b)	QUANTITY ORDERED (c)	UNIT (d)	UNIT PRICE (e)	AMOUNT (f)	QUANTITY ACCEPTED (g)
00010	<p>Admin Office: FWS, DIV OF CONTRACTING AND FA 5275 Leesburg Pike MS: BMO Falls Church VA 22041-3803 Period of Performance: 03/01/2017 to 02/28/2018</p> <p>SIN 132-52 Texifter Enterprise License.</p> <p>Accounting Info: 01 Account Assignm: K G/L Account: 6100.233N0 Business Area: F000 Commitment Item: 233N00 Cost Center: FF09E23000 Functional Area: FES111100.000000 Fund: 178F1611MD Fund Center: FF09E23000 Project/WBS: FX.ES111109000000 PR Acct Assign: 01 Funded: \$23,677.59</p> <p>Accounting Info: 02 Account Assignm: K G/L Account: 6100.233N0 Business Area: F000 Commitment Item: 233N00 Cost Center: FF09E42000 Functional Area: FES111300.000000 Fund: 178F1611MD Fund Center: FF09E42000 Project/WBS: FX.ES111309000000 PR Acct Assign: 02 Funded: \$71,032.74</p> <p>ELECTRONIC INVOICING AND PAYMENT REQUIREMENT - INTERNET PAYMENT PLATFORM (IPP) (SEPTEMBER 2011) Payment request must be submitted electronically through the U.S. Department of the Treasury's Internet Payment Platform System (IPP). "Payment request" means any request for contract financing payment or invoice payment by the Contractor. To constitute a proper invoice, the payment request must comply with the requirements identified in the applicable Prompt Payment clause included in the contract, or the clause 52.214-4 Contract Terms and Conditions - Commercial Items included in commercial Continued ...</p>				94,710.33	

TOTAL CARRIED FORWARD TO 1ST PAGE (ITEM 17(H))

\$94,710.33

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OPTIONAL FORM 348 (Rev 4/2006)  
Prescribed by GSA FAR (48 CFR) 53.213(f)

DOI-2018-07 01126

**ORDER FOR SUPPLIES OR SERVICES**  
**SCHEDULE - CONTINUATION**

PAGE NO

3

IMPORTANT: Mark all packages and papers with contract and/or order numbers.

DATE OF ORDER

CONTRACT NO.

ORDER NO

03/14/2017

GS-35F-002CA

F17PD00383

ITEM NO (a)	SUPPLIES/SERVICES (b)	QUANTITY ORDERED (c)	UNIT (d)	UNIT PRICE (e)	AMOUNT (f)	QUANTITY ACCEPTED (g)
	<p>item contracts. The IPP website address is: <a href="https://www.ipp.gov">https://www.ipp.gov</a>.</p> <p>Direct questions regarding this order to Michael Coghill (703) 358-2288 or via email: <a href="mailto:michael_coghill@fws.gov">michael_coghill@fws.gov</a></p> <p>Direct technical questions to Marcia Cash 703-358-2013</p> <p>The total amount of award: \$94,710.33. The obligation for this award is shown in box 17(i).</p>					

TOTAL CARRIED FORWARD TO 1ST PAGE (ITEM 17(H))

\$0.00

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DOI-2018-07 01127





## Sole Source Justification

### A. Description

The Service publishes approximately 150 proposed rules each year. All proposed rules are available for public comment in Regulations.gov. Members of the public have the option to submit comments electronically via Regulations.gov or to mail their comments to the Service. All mailed-in comments are scanned and uploaded into the agency-side program of Regulations.gov – the Federal Docket Management System (FDMS).

At the end of the rulemaking comment process, the Service's rule writers must review each comment received for consideration as they develop the final rulemaking document. The Service often receives tens of thousands - occasionally hundreds of thousands - comments from the public. In some cases, there are time-sensitive, court-ordered deadlines that the Service must comply with making it essential that we are able to review and analyze the public's comments in an expeditious fashion.

The use of Regulations.gov and FDMS are mandatory for all Federal agencies. The programs were designed to meet the needs of most agencies; however the Service is among a small group of Federal users that have needs that exceed the program design of FDMS. To meet these needs, some agencies have outsourced the entire comment analysis process or hired additional staff to process the comments. Due to the decentralized nature of the Service, such options are not suitable for us.

Rulemaking originates from a variety of offices located throughout the country, to include individual refuges and field offices. Since the responsibility for comment review is so wide-spread, the tools for analysis must be available to all Service personnel. Therefore, the Service needs a web-based comment analysis tool that:

- Is available Service-wide with sufficient access to accommodate multiple docket reviews;
- Enables rule writers to upload all electronic comments received via Regulations.gov;
- Provides peer access to comments so multiple users can share in the reviewing process;
- Finds duplicate comments;
- Allows users to make notes and bookmark individual comments;
- Prepares reports;
- Provides Help Desk service;
- Is intuitive so that Service users do not have to change their business practices.

### B. Justification

#### a. Circumstances

Dr. Stuart Shulman, PhD is the founder and CEO of Texifter, LLC – whose major product is DiscoverText. He has a PhD in Political Science from the University of Oregon.

Texifter, LLC is a spin-out company based on text analysis research by Dr. Stuart Shulman, the founder of Qualitative Data Analysis Program (QDAP) at the University of Pittsburgh and former Director of QDAP-University of Massachusetts Amherst. Dr. Shulman has conducted research primarily in the domain of electronic rulemaking, with a specific focus on the development of human language tools for reviewing large numbers of public comments. He has been sole inventor on five distinct software applications that support tasks ranging from text classification, blog capture, and manuscript review management, to the development of better annotation for improving optical character recognition. New research focuses on the detection of threats and novel ideas communicated in public comments, blogs and other media. Texifter is a vehicle for the widespread use of new tools developed in the QDAP labs.

DiscoverText's capabilities are a direct result of Dr. Shulman's background and expertise. This program was designed specifically for the kind of comment management required by the Service. His program more than meets the needs of the Service's rulewriters and provides capabilities that can be used in the future.

#### **b. Other Capable Sources**

When FDMS and Regulations.gov were originally launched several years ago, there was an expectation that an adequate comment management module would eventually be part of FDMS. The agencies with exceptional needs had to find ways outside of FDMS to handle their comment analysis until that module was developed.

Over the years, FDMS has added a few comment management tools that are available while a user is logged in to the program. These tools provide de-duplication analysis – which is just the first step in comment review.

Since the user must remain in FDMS in order to use these tools, each review request is sent to the FDMS programmers to run scripts and return results by the next day. The navigation options in FDMS are limited, which makes the review process slow.

Lack of navigation efficiency is magnified when tens of thousands of comments are involved – a scenario common to the Service. Beyond these preliminary de-duplication tools, there are no plans in the near or long-term future for additional tools to be added to FDMS. Any further development would be wholly within FDMS, and not be an efficient way to handle thousands of records.

The Department of the Interior has adopted a policy that user access to FDMS be limited as each "seat" adds to the cost. Therefore, docket managers and peer reviewers will not have access to the comments, and don't have access to the tools at all.

The Service tried a variety of ways to address its pressing need for a way to review, manage, and analyze the thousands of public comments received in response to our rulemaking activities, including trials of existing programs and consultants. One consultant, Texifter, had a web-based program (Public Comment Analysis Tool or PCAT) that some Service employees tested on a trial basis. As comment activity from Regulations.gov increased, the Service's need for assistance with comment review, management, and analysis increased and evolved.

In 2010, the Service contracted with Texifter's training partner, AEEC, Inc., to provide training and access to PCAT. During this time, the program was upgraded and customized to address the Service's unique needs. The customization and upgrade of the software to address the needs of the Service make this tool the most complete and efficient solution available to meet our comment management needs. Texifter allowed Service users to access the newer upgraded software known as DiscoverText.

When that license agreement expired, the Service contracted with DiscoverText, with one base year and four option years. The fourth option year is expiring in 2017.

The Service continued to participate in a discussion with representatives from the National Park Service (NPS) during which NPS described a program developed by their contractor that contains a module that has the capability to analyze comments. This module, which is only one of eight modules that comprise the program, does address some of the same requirements of FDMS comment analysis. However, the intent of NPS's program is not eRulemaking. With their program, much of the processing must be done manually by their contract programmers. The files/comments to be analyzed must be hosted on their servers. NPS does not have adequate program support staff to add another user such as the Service. Therefore, in its present configuration, this does not represent a reasonable solution for the Service.

The Federal rulewriters who use consultants to manage the entire process, the going rate for comment management is about \$1 per comment. With this method, one comment collection could cost more than the annual fee for DiscoverText.

There are several highly controversial proposed rules that will be published in the near future that we expect to generate hundreds of thousands of public comments, thus making our need for this software even more critical.

**c. Barriers to Competition**

The Service is unique among government agencies – Federal, State and Local – in their comment management requirements. There are several high-profile proposed rulemakings every year that easily generate 500,000 – 1,000,000+ comments each. Other agencies either don't generate that volume, have large staffs, or hire consultants to handle to process. They may have more "comment periods", but the volume of comments received per "period" is significantly lower.

The source of public comments for the Service is via Regulations.gov. The public submits comments directly on that website. Mailed-in comments are scanned and uploaded manually to Regulations.gov. No other method is used for receiving public comments.

Other public comment management software offers "full service" tool that includes a front-end comment entry module, "dashboards", and other features not needed by the Service. Customizing these kinds of programs to address the Service-specific requirement usually is more expensive than the original software.

There are a number of developers and software tools that can process records. They will customize the software to "fit your needs". Not being a developer, or someone familiar with the latest in technological advances, its not always an advantage for a Biologist, for example, to tell a programmer how to program.

The advantage of working with DiscoverText is that Dr. Shulman, as a political scientist with a computer lab at his disposal, knows our requirements and designed his program with the Service's specific needs addressed. As users of DiscoverText, we don't have to give instructions to the programmers. Dr. Shulman takes care of it all.

**C. Recommendation and Certification by Program Office**

Based on the above justification, I recommend this acquisition to be conducted using sole source acquisition procedures as specified in FAR Part 13. I hereby certify that this justification is accurate and complete to the best of my knowledge and belief.

\_\_\_\_\_  
Program/Project Officer Name, Program/Project Officer

\_\_\_\_\_  
Date

**D. Contracting Officer Certification and Approval**

Based on the above justification, I hereby certify that the circumstances of this contract action deem only one source reasonably available and approve the use of sole source acquisition procedures for this purchase.

\_\_\_\_\_  
Contracting Officer Name, Contracting Officer

\_\_\_\_\_  
Date

**E. Concurrence by Chief of Contracting Office (*only required for awards exceeding \$25,000*)**

I hereby concur that the circumstances of this contract action deem only one source reasonably available.

\_\_\_\_\_  
Chief of Contracting Office Name, Chief of Contracting Office

\_\_\_\_\_  
Date

## Statement of Work

The US Fish & Wildlife Service is seeking Custom Computer Programming Services (NAICS 541511) to provide support for regulation writers analyzing public comments submitted to the agency in a variety of ways, including via electronic mail or through [www.regulations.gov](http://www.regulations.gov).

The Service is seeking a Web-based software solution that can import bulk downloads from the Federal Docket Management System as well as email servers. The system must offer advanced search and tag cloud tools, advanced bucket, code, and memo capabilities, peer-based collaboration and communication tools, a minimum of 50,000,000 documents total storage, comment analytic services including duplicate detection, near-duplicate detection, threshold-sensitive clustering, extraction from PDF files to text, and automatic identification of unique and offensive language in comments.

There must be sufficient access to the software for all Service personnel to include multiple docket processing during the same time period. Service users should be able to perform imports of files into the web-based system. Peer-review grouping is needed to share in the reviewing process. A means of communication among peers is required.

The program must allow the project files to be either assigned to specific reviewers, or shared randomly. There must be a mechanism to attach a reviewer's identification to each record as a means of showing that all comments have been examined. The program should provide a report of records that have not be reviewed.

The program must identify duplicate and near-duplicate records. The user should be able to identify the degree of "identical" for each process. Files must be sorted into categories that can be retrieved after sorting, based on criteria chosen by the user.

The program must present subsets of records and their attachments in an efficient manner. Minimizing keystrokes should be a major consideration in the ability to move from record to record rapidly.

Users must be able to make notes and bookmarks on records in a way that can be retrieved for sharing among peers and for reporting purposes.

The program must have a reporting capability to show the various stages of review. A report showing the results of the final analysis must be available.

The contractor must provide Help Desk services by phone and email. Web-based training guides on all aspects of the program must be available.

The contractor should offer comment analysis services for additional fees for in-depth comment analysis by subject matter experts familiar with using the software. These consulting services are separate from this license.

The contract should cover a one-year license, with four option years.

Independent Government Estimate (IGE):

Base Year: \$100,000  
Option Year 1: \$100,000  
Option Year 2: \$100,000  
Option Year 3: \$100,000  
Option Year 4: \$100,000