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BY EMAIL AND US MAIL

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Diane LeMasters
Contract Administrator
William S. Hart School District
21380 Centre Pointe Parkway
Santa Clarita, CA 91350

Re: RFP Package No. WSH16-06B MFD Lease and Maintenance Services

Dear Ms. LeMasters

Xerox understands that the William S. Hart Union High School District (the "District") has awarded a contract to American Business Machines ("ABM") with respect to the above-referenced solicitation (the "RFP"). For the reasons set forth below, Xerox hereby protests that award, and respectfully requests the District to rescind the award, and either award the contract to Xerox or, in the alternative, issue a new solicitation.

The equipment in ABM's proposal fails to meet the mandatory specifications of the RFP for the following reasons:

1. Web and MFD Scan Requirement 1 (page 93 of the RFP) requires:

RSA QDirect.Scan, or operationally equivalent system, with full "quick-copy" job ticketing at MFD and resides as an integrated element on the user interface.

ABM's Canon UniFlow solution does not meet this requirement as indicated in their description of the workflow provided in response to question 6 of Exhibit C. ABM clearly describes a two-step workflow whereby teachers will need to first scan their documents at the MFP and then submit them to the Print Center via a web submission tool (which implies they will then need to subsequently access the scanned file(s) at a computer workstation as the 2nd step in the workflow). There is no "quick-copy" job ticketing at the MFD nor does the job ticket reside as an integrated element on the user interface.

2. Web and MFD Scan Requirement 3 (page 93 of the RFP) requires:

RSA QDirect.Scan, or operationally equivalent system, with full job ticketing. Job ticket is embedded on MFP user interface for scanning to Copy Center with no re-ticketing.

Since ABM's Canon UniFlow solution is two-step workflow whereby teachers will need to first scan their documents at the MFP and then submit them to the Print Center via a web submission tool, this is not a direct scan to the Print Center. Therefore there is no job ticket embedded on the MFP nor is the job submitted to the Print Center without re-ticketing.

3. Web and MFD Scan Requirement 5 (page 93 of the RFP) requires:

Update to the ticketing on the MFD's QDirect.Scan, or operationally equivalent system, with full job ticketing can be broadcast from the server seamlessly and quickly.

Since ABM's Canon UniFlow solution is a two-step workflow whereby teachers will need to first scan their documents at the MFP and then submit them to the Print Center via a web submission tool, this requirement cannot be met since there is no job ticket at the MFD.

4. Web and MFD Scan Requirement 7.4.4 (page 99 of the RFP):

Rules-based printing:

ABM's Canon UniFlow solution does not have a rules-based printing functionality whereby the Print Center staff can batch submit jobs based on rules such as common paper type or color, simplex or duplex, stapling, etc. Therefore, this requirement cannot be met.

5. Web and MFD Scan Requirement 7.8.4.1 (page 99 of the RFP) requires:

The system shall be capable of making intelligent processing decisions in an automated fashion. For example, if the job meets specific configurable business rules (e.g. less than 200 impressions of simplex B/W), it should automatically be released to an appropriate printer without the need for operator intervention.

Since ABM's Canon UniFlow solution does not have a rules-based printing functionality this requirement cannot be met as it is a primary function of rules-based printing.

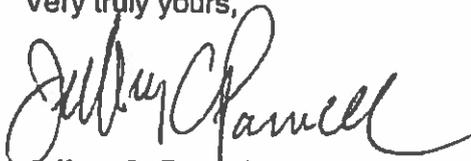
6. Web and MFD Scan Requirement 11 (page 102 of the RFP) requires:

RSA WebCRD, or operationally equivalent system, with full job ticketing has intelligent finishing, meaning finishing commands are carried all the way thru to the production device.

ABM's Canon UniFlow solution does not support auto-flow of job ticketing parameters from end-user submission to Print Center release to printer. Therefore, every print job submitted will require Print Center staff to input job details into printer submission job-ticket. Therefore, the "intelligent finishing" requirement cannot be met as the finishing commands are not carried all the way thru to the production device.

For the foregoing reasons, ABM's proposed equipment fails to meet the mandatory specifications. Therefore, Xerox respectfully requests that the award to ABM be withdrawn and that the contract be awarded to Xerox. In the alternative, Xerox requests that the RFP be re-issued.

Very truly yours,



Jeffrey C. Parnell
Senior Managing Counsel

cc: Leigh Hansen, Director of Purchasing and Warehouse
Theodore Lieu
Erin Lillibridge