

Congress of the United States
Washington, DC 20515

January 31, 2018

The Honorable Mark T. Esper
Secretary of the Army
101 Army Pentagon
Washington, D.C. 20310-0101

General Mark A. Milley
Chief of Staff
United States Army
200 Army Pentagon
Washington D.C. 20310-0200

Dear Secretary Esper and General Milley,

Thank you for your response to our proposal for an interim solution to retain six Attack Reconnaissance Battalions (ARBs) in the Army National Guard. We appreciate your engagement on this issue. Respectfully, we would like to highlight certain points included in your response which are subject to honest dispute and which underscore our continued concern about the impacts this decision may have on the readiness of the Total Force:

Number of ARBs. While the Army is currently building ARBs 21 and 22 for the 11th CAB in accordance with NCFA guidance, they are programmed to build ARBs 23 and 24 for a 12th CAB by ~FY20. The Army has also conducted planning associated with creating an Armored Cavalry Regiment that includes attack aviation assets coinciding with the build of a 16th Armored Brigade Combat Team.

Warrant Officer Shortage. According the Army's own G1 Aviation Dashboard from November 2017, the Army was 89% manned for all Warrant Officers, and 84% manned for AH specific Warrant Officers. As of the November report, the Army was short 204 AH-64 Warrant Officers. There are 47 Warrant Officers authorized for an ARB. If equated to ARBs, the Army has a shortage of 4.3 Battalions worth of Warrant Officer aviators.

The Army also continues to make mention of its plan to address current and future shortages. This has been defined in multiple orders, and the plan is dependent on the success of utilizing Call to Active Duty, Retiree Recall, ARNG personnel in ADOS status, and aviator retention bonuses. With the exception of retiree recall, all of these programs are uncontrollable by the Army and, to date, all have been unsuccessful in achieving the goal of eliminating Warrant Officer shortages. One example is the recently released aviator bonus. The bonus had a historically low acceptance rate of ~10% and

resulted in an increase of Unqualified Resignation submittals. As a result, the Army is currently revising the bonus, and time will tell of success of the next iteration.

Shortage of ARNG AH-64-Specific Officers. One example of the misleading assertion that the Active Component is healthier than the ARNG can be seen with 1-285th ARB, currently stationed in both Arizona (AZ) and Missouri (MO). While MO has largely transitioned to its new assault aircraft structure, they have retained an AH company that was moved from AZ structure to MO structure. MO currently does not fill its company with qualified aviators and has used the authorizations to hold personnel awaiting flight school training. In turn, even with the loss of the company structure, AZ has the capability to fully man all three companies (2 x AZ/ 1 x MO) and carries the additional unauthorized personnel in an excess status. Essentially, the structure moved, but the people stayed—a fact not addressed in your response.

Dwell Ratios of Units vs. Individuals. Per our understanding, while the Active Component currently has the force structure to maintain an appropriate dwell ratio for the ARBs, it continues to shuffle personnel between the ARBs to fill manning gaps. Often aviators will be deployed, return from deployment, and after only a brief stabilization, be processed for permanent Change of Station (PSC) to the next deploying unit. Thus, while the physical unit has adequate dwell between deployments, the individual does not. We feel this practice is a contributing factor to the increasing attrition rate of Active Component aviators. We would be interested to see a report on the deployment-to-dwell ratio by individual AH-64 aviators to support the claim in your letter.

Additionally, your letter specifically states that it would take eight ARNG ARBs to continuously support a deployment requirement. Given the Army's decision to accept the bare minimum National Commission on the Future of the Army (NCFA) requirement of retaining only four ARBs in the ARNG, how does the Army plan to ensure the success of the ARNG and its ability to meet deployment requirements with less than half of the required force structure that you claim is needed?

Costs Associated with Retaining Six ARNG ARBs. The Army attributes the cost of keeping six ARNG ARBs to the cost of building up two brand new ARNG ARBs. However, with the AZ ARB specifically, we disagree with this cost assessment. The 1-285th is fully manned today. With a small allocation of training seats and the return of aircraft could deploy in short turn, with its unit infrastructure completely intact. Therefore, if the Army were to keep the 1-285th, the cost would only amount to normal annual operation and maintenance costs, not the costs of standing up a new unit.

Further, AZ has the capability within the state today to man its ARB without any need for pass back to another organization. While it is true that personnel would be moved from other organizations, we feel the readiness benefits of keeping an RL-1 combat ready unit in the short term would outweigh inefficiencies.

Lack of Availability of Training Quotas for ARNG at USAACE. We have been informed that the National Guard has not been allotted sufficient training seats at the U.S. Army Aviation Center of

Excellence (USAACE) Ft. Rucker in line with codified regulations. Rather, records show that Active Component aviators are specifically prioritized over National Guard and Foreign Military Sales (FMS) training to the detriment of overall readiness. In fact, according to our state leaders, AZ ARNG units have not been allotted AH training seats in the past three years. The ARNG ARBs were told that training seats were not made available until an ARB stationing decision was made, so we would appreciate a further explanation and justification for why training seats would not be provided to Soldiers actively serving in their MOS and in the appropriate force structure, regardless of the component in which they serve in or what basing decision was being finalized.

Ability of Ft. Rucker to Deliver Actual Aviator Requirements. We also take issue with the method by which Ft. Rucker reports its student throughput. Rather than assessing its requirements based on the number of aviators needed to man ARBs planned currently and in the near future, USAACE calculates its “requirements” based on the number of aviators it has the ability to train each year. In other words, it bases its success rate on the number of aviators it *can* graduate; not the number of aviators we *need* to graduate in order to solve the current pilot shortage.

Additionally, despite having 110 AH-64s located at Ft. Rucker (30 over the 80 recommended in NCFA), there has been no significant increase to Ft. Rucker’s student throughput; in fact, student throughput is roughly the same as previous years when Rucker had fewer airframes on hand. According to our calculations, the 10% of AH-64s slated for remanufacture from AH-64D models to AH-64E models does not account for this discrepancy. This raises concerns given that the Army has chosen to make Ft. Rucker its sole rotary wing training site over keeping the Western and Eastern Army Aviation Training Sites (AATS) open to alleviate these throughput challenges. This also raises concerns about whether, even with additional aircraft and consolidating training, Ft. Rucker is able to take on additional training loads to meet demand for Active Component and National Guard aviators, as well as ensuring the U.S. keeps pace with contract commitments to FMS buyers of U.S. rotary wing aircraft.

Inefficiency of Mobile Training Teams Compared to AATS Locations. Further, we feel the use of Mobile Training Teams (MTTs) obfuscates the challenges Ft. Rucker faces in producing needed numbers of aviators. By the Army’s own metrics, MTTs are less efficient than WAATS: where WAATS has a 3:1 ratio of aviators to aircraft compared to Ft. Rucker’s 6:1 ratio, the MTT is currently tracking a 2:1 ratio. If the argument for standing down the AATS locations is that consolidating rotary wing training into one location is more efficient, the use of MTTs, which result in fewer aircraft available for training at USAACE, contradicts the premise of this argument.

We agree that delaying a decision on attack aviation basing in the National Guard is indeed harmful to readiness. However, rushing to complete a flawed plan that could have a lasting impact on readiness will continue to increase risk in a high-threat environment. Further, this decision would not support the current Administration’s “peace through strength” initiative as referenced in the 2018 National Defense Strategy, which prioritizes “preparedness for war” today—not two years from today.

As a result of these disputes in good faith, we request that the Army suspend the transfer order for the four remaining AH-64s from the 1-285th, ordered to be effective February 15, 2018, and rescind authorization for the National Guard Bureau to transfer additional Apaches until we can collectively view the following documents (detailed for the last 16 months) in a classified setting:

- Monthly Aviation Readiness Review (MARR)
- Strategic Portfolio Analysis Review (SPAR)
- G1 Aviation Dashboard with full details, including rank and air frame

We also request, following the viewing of these documents, an in-person discussion that includes our respective state Army National Guard leaders as well as Active Component Army leadership, in order to resolve these disputes and have confidence in a way forward for attack aviation across the Total Force.

Again, we sincerely appreciate your engagement on this vital attack capability. We look forward to your prompt response.

Very respectfully,



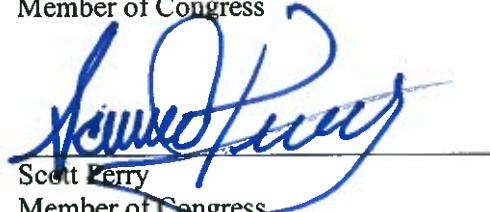
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