Audit Report

OFFICE OF THE INSPECTOR GENERAL

QUICK-REACTION REPORT ON MODIFYING C-26 AIRCRAFT FOR COUNTERDRUG MISSIONS

Report No. 94-067 March 23, 1994

Department of Defense

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March 23, 1994

MEMORANDUM FOR ASSISTANT SECRETARY OF THE AIR FORCE
(FINANCIAL MANAGEMENT AND COMPTROLLER)

SUBJECT: Quick-Reaction Audit Report on Modifying C-26 Aircraft for Counterdrug Missions (Report No. 94-067)

We are providing this report for your review and comments. As part of our ongoing audit of National Guard Support to Drug Interdiction (Project No. 3RF-0055), we evaluated the National Guard's plan to modify 10 C-26 aircraft for counterdrug use. A $6.8 million contract award is tentatively scheduled for the second quarter of FY 1994 to modify two of the C-26 aircraft. However, the urgent need for the aircraft in a counterdrug mission has not been validated and alternatives have not been evaluated.

A draft of this report was issued to the Department of the Air Force on February 25, 1994, requesting comments to be provided by March 14, 1994, for inclusion in the final report. Comments were not provided by the suspense date. Comments received after issuance of this report will be considered comments on the final report. This report and our analysis of Air Force comments that may be provided will be forwarded directly to the Assistant Inspector General for Analysis and Followup to initiate mediation and/or elevation of the issue in accordance with DoD Directive 7650.3.

The courtesies extended to the audit staff are appreciated. If you have any questions on this audit, please contact Mr. Harrell D. Spoons, Program Director, at (703) 692-2846 or Mr. Marvin L. Peek, Project Manager, at (703) 692-2939. The distribution of this report is listed in Appendix C.

Robert J. Lieberman
Assistant Inspector General
for Auditing

Office of the Inspector General, DoD

Report No. 94-067
Project No. 3RF-0055.01

March 23, 1994

QUICK-REACTION REPORT ON MODIFYING C-26 AIRCRAFT FOR COUNTERDRUG MISSIONS

EXECUTIVE SUMMARY

Introduction. As part of our ongoing Audit of National Guard Support to Drug Interdiction (Project No. 3RF-0055), we evaluated the Air National Guard's plan to modify 10 C-26 aircraft to provide photo reconnaissance and surveillance support to law enforcement agencies for counterdrug missions. One of the 10 aircraft is already being modified. A contract award is tentatively scheduled for the second quarter of FY 1994 to modify two more aircraft.

Objective. The audit objective was to determine whether the National Guard Bureau validated the need to modify the C-26 aircraft or evaluated other alternatives before approving modification of 10 C-26 aircraft for use in counterdrug missions. We reviewed applicable internal controls.

Audit Results. The National Guard Bureau approved modification of 10 C-26 aircraft without validating the need for modifying the aircraft, verifying the quantity of aircraft needed, or evaluating alternatives. Funds may be expended unnecessarily to modify the aircraft.

Internal Controls. We limited our review of internal controls to the processes used to approve and modify the C-26 for counterdrug support. We did not identify any material internal control weaknesses. See Part I for the internal controls assessed.

Potential Benefits of Audit. Canceling the modification of two C-26 aircraft could result in about $6.8 million being put to better use. Additionally, if plans to modify the other seven C-26 aircraft are canceled, expenditures estimated at $15.8 million will be avoided in future years (see Appendix A).

Summary of Recommendation. We recommended that the Chief, National Guard Bureau, notify the Air Force Materiel Command to suspend contract award on the C-26 modification project until the requirement is validated and a cost and operational effectiveness analysis is conducted.

Management Comments. The Air Force did not provide comments on a draft of this report. Because award of the questioned contract is imminent, comments received after issuance of this report will be considered comments on the final report. For purposes of expediency, this report will be forwarded directly to the Assistant Inspector General for Analysis and Followup to initiate mediation and/or elevation of the issue in accordance with DoD Directive 7650.3.

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Part I - Introduction

Background

State governors submit annual counterdrug plans to the Secretary of Defense through the National Guard Bureau (the Guard). The plans identify mission requirements for the National Guard's support to law enforcement agencies in counterdrug operations. Within the Air National Guard (ANG), the Directorate of Counterdrug (Counterdrug Directorate) is responsible for identifying mission needs based on each state's counterdrug plans. If assets must be acquired or modified, the Directorate of Acquisition (Acquisition Directorate), ANG, is responsible for evaluating acquisition alternatives to determine cost, capability, and expected delivery dates. Also, the Director, Acquisition Directorate, is responsible for the development of system specifications, based on mission needs; for supplying reconnaissance and mission support aircraft; and for the test and evaluation of systems to ensure that the ANG is fully capable of meeting its mission.

Objective

The audit objective was to determine whether the Guard validated the requirement to modify 10 C-26 aircraft and evaluated other alternatives before approving modification of the C-26 aircraft for counterdrug use. We also evaluated applicable internal controls.

Scope and Methodology

We evaluated the Guard's plans for modifying C-26 aircraft in the ANG inventory with counterdrug sensor equipment. We examined C-26 operational requirements documents; the contract, dated January 4, 1993, for the first of 10 C-26 aircraft to be modified; acquisition plans for modifications of additional aircraft; and documents on existing and planned counterdrug aircraft that have photo reconnaissance and surveillance capabilities.[1] The records we reviewed related to the C-26 modifications were dated from November 1989 through February 1994. We interviewed cognizant Air Force, Air and Army National Guard personnel, and contractor officials involved in the C-26 modification project. Appendix B lists the organizations visited or contacted during the audit. We did not rely on computer-processed data to develop conclusions on this audit.

[1]The Active Air Force and the Army and Air National Guard had aircraft with photo reconnaissance and surveillance capabilities in their inventories.

This economy and efficiency audit was made from June 1993 to January 1994. The audit was made in accordance with auditing standards issued by the Comptroller General of the United States, as implemented by the Inspector General, DoD. Accordingly, we included tests of internal controls considered necessary.

Internal Controls

We limited our review of internal controls to the process that the Guard used in approving and directing the modification of C-26 aircraft for counterdrug support. Although the Guard did not follow DoD procedures for selecting and approving the C-26 aircraft for modification, we did not deem the weakness to be material. We will assess internal controls over the Guard's Drug Interdiction Program and the implementation of the DoD Internal Management Control Program in our overall audit of National Guard Support to Drug Interdiction.

Prior Audits and Other Reviews

The General Accounting Office Report No. GAO/NSIAD 92-260 (Office of the Secretary of Defense Case No. 9100), "Drug Control: Oversight Needed to Prevent Acquisition of Unnecessary Equipment," July 1992, discusses the Guard's acquisition of the UC-26C aircraft. The report states that the Guard did not follow DoD acquisition policy. Specifically, the Guard did not:

- define requirements in broad operating capabilities;

- base the acquisition of the UC-26C aircraft on a validated threat;

- determine whether existing resources could have satisfied the counterdrug role; and

- evaluate alternatives to the acquisition.

The General Accounting Office recommended that the DoD Coordinator for Drug Enforcement Policy and Support disapprove future requests for counterdrug funds for the UC-26C program, "unless a valid requirement for the aircraft is established and the Coordinator's office verifies that the requirement cannot be met with existing or planned assets of either DoD or another interdiction agency."

The DoD Drug Coordinator partially concurred with the recommendation, and the Guard indicated it would continue to evaluate evolving systems that show potential, cost-effective use in the counterdrug mission. Our current audit showed that the Guard did not validate the requirement to modify 10 C-26 aircraft and did not sufficiently evaluate alternative aircraft.

Part II - Finding and Recommendations

Modifying C-26 Aircraft for Counterdrug Use

The National Guard Bureau (the Guard) approved the modification of 10 C-26 aircraft for counterdrug use without validating the need for modifications, verifying the number of aircraft to modify, or evaluating other alternatives. The Air National Guard (ANG) decided that the C-26 aircraft should be used in a counterdrug role without preparing a cost and operational effectiveness analysis to aid in the decisionmaking process. As a result, one C-26 is being modified, and an estimated $6.8 million in counterdrug funds may be spent unnecessarily to modify two other C-26 aircraft. An additional seven aircraft, that may not be needed, will be modified at an estimated cost of $15.8 million if the plan is completed.

Using the C-26 Aircraft to meet Counterdrug Requirements

The FY 1989 counterdrug plans prepared by Texas and California identified a requirement for an aircraft capable of performing aerial interdiction of aircraft crossing the U.S./Mexican border and detection of marijuana growing areas. The Director, ANG, decided that the C-26, a medium-size, turbo-prop aircraft, would ideally satisfy the requirement. The C-26 aircraft was assigned to ANG units in 26 states to provide operational support (transporting personnel and equipment) to state Adjutants General and wartime support to combatant commanders. In FY 1991, the ANG developed a concept of operations with the C-26 operating in an air interdiction role as part of a "hub" concept. The "hub" concept was fully supported by the Commander in Chief, North American Aerospace Defense Command, and was approved by the Secretary of the Air Force. The C-26 would be deployed along with ground mobile radars and Blackhawk helicopters to work in conjunction with the North American Aerospace Defense Command in detecting and tracking suspected drug smugglers and in assisting the law enforcement agencies in interdiction and apprehension.

Satisfying the "Hub" Concept of Operations. In June 1991, the ANG Acquisition Directorate procured a modified C-26 aircraft, designated the UC-26C, to satisfy the "hub" concept of operations. The UC-26C was already equipped with air-to-air radar, sensor equipment, (that is, cameras, and forward-looking infrared radar), and communication equipment. The aircraft was later modified to add more sensor and communication equipment for the counterdrug mission. The Acquisition Directorate conducted operational testing and evaluation of the UC-26C aircraft from January through April 1992 to assess the operational effectiveness and suitability of the proposed counterdrug aircraft and to assess the feasibility of modifying additional C-26 aircraft. Results of the testing and evaluation showed that the UC-26C, as configured, was an operationally effective aircraft in supporting Federal and State law enforcement agencies.

However, the aerial interdiction capability was not needed based on a study made by National Security Analysts, Inc., in April 1992, at the request of the ANG Counterdrug Directorate. A report on the study identified other DoD and non-DoD agencies having an aerial interdiction and detection capability and suggested using the C-26 in support of photo reconnaissance, surveillance, and tracking of ground targets throughout the United States.

Using the ANG's Inventory of C-26s. On November 24, 1992, the Chief, National Guard Bureau, directed the Acquisition Directorate to modify 10 C-26 aircraft in the ANG's inventory with counterdrug sensor equipment. The Chief based that decision on the results of the operational testing and evaluation of the UC-26C aircraft. Since the C-26s were used for operational support, the Director, Acquisition Directorate, determined that the counterdrug sensor equipment should be integrated into a removable pod attached to the bottom of the C-26 airframe and operated from a console within the aircraft. The Director also determined that users either attach or remove the pod and console from the C-26 within 4 hours to maintain the integrity of both operational and counterdrug support.

Awarding a Contract for C-26 Aircraft Modifications. On January 4, 1993, the Special Activities Contracting Division, Air Force Materiel Command, awarded a sole source, cost-plus-incentive-fee contract to Lockheed Fort Worth Company, (formerly General Dynamics). The award was for preliminary system design and analysis, installation, and fabrication of a "dummy" pod[2] for flight test certification. Lockheed subcontracted the structure modifications for attaching the pod to the airframe to Fairchild, Inc., the manufacturer of the C-26 aircraft. Lockheed conducted engineering design and analysis and fabrication of a sensor pod containing cameras and forward-looking infrared radar for installation on the first of 10 C-26 aircraft to be modified.

The first modified C-26, estimated to cost about $8.8 million, is scheduled for delivery in May 1994. Additionally, as of the time of the audit, the Special Activities Contracting Division had spent $4.3 million of ANG counterdrug procurement funds for forward-looking infrared radars for production number two through seven C-26 aircraft to be modified. The Special Activities Contracting Division plans to award a contract in the second quarter of FY 1994 to modify two aircraft, at a cost of about $6.8 million. The ANG plan is to modify seven additional aircraft, at an estimated cost of $15.8 million, to complete the 10-aircraft program.

Validating the Need to Modify the C-26 Aircraft

The ANG did not validate the need to modify 10 C-26 aircraft. Paragraph B.4. of an undated document (Air National Guard State Plans, Project

[2]The "dummy pod" is ballasted to represent pod weight and center of gravity, but does not contain sensor equipment.

No. 7403) prepared to support the FY 1994 through FY 1999 Counterdrug Program Objective Memorandum states that the ANG ". . . currently has the capability to support the operations listed above." The operations referred to included the following:

- o aerial reconnaissance,
- o aerial surveillance,
- o aerial photo reconnaissance,
- o film processing for photo reconnaissance, and
- o aerial interdiction.

That same document states that the ANGs support capability would substantially increase when additional C-26 aircraft are modified with counterdrug specific support equipment. Thus, modifications to C-26 aircraft consume diminishing resources to enhance an existing capability rather than meet a shortfall in operational capability.

Following the decisions on the type and quantity of aircraft to be modified, the ANG Counterdrug Directorate solicited the state Adjutants General to identify candidate states that could use a modified C-26 aircraft. The Counterdrug Directorate received requests from 23 states for the C-26 aircraft for counterdrug missions. However, only seven states indicated they would use the modified C-26 aircraft for photo reconnaissance and surveillance operations.

The ANG Counterdrug Directorate indicated to the Chief, National Guard Bureau, that the requests from the 23 states validated the need for additional photo reconnaissance capability. DoD Instruction 5000.2, "Defense Acquisition Management Policies and Procedures," February 23, 1991, part 4, section B, "Evolutionary Requirements Definition," states that requirements should be identified in broad operational capability and not be described in terms of equipment or system-specific performance characteristics. The decision to modify the C-26 aircraft for photo reconnaissance capability constituted a system-specific solution to satisfy a suggestion made in the National Security Analysts study report. Although photo reconnaissance is a valid counterdrug mission, the 23 states' responses merely indicated that a modified C-26 aircraft could be put to use rather than validated the need for modifying 10 C-26 aircraft.

In satisfying the need for photo reconnaissance and surveillance capabilities, the ANG could have identified a nonmateriel solution, to include changes in operational doctrine, tactics, or concepts, rather than modification of the C-26 aircraft. According to DoD Instruction 5000.2, materiel solutions require that the DoD Component responsible for identifying requirements prepare a mission need statement describing the operational deficiency in terms of broad

operational capability (such as mission and objective). The mission need statement is then submitted for approval. The ANG prepared a draft mission need statement but did not submit it to the Air Force, Deputy Chief of Staff, Plans and Operations.

Evaluating Alternatives to the C-26 Aircraft

Before deciding to modify the C-26 aircraft, the ANG Acquisition Directorate did not evaluate existing and planned capabilities that showed potential cost-effective and operationally effective use in the counterdrug mission. In accordance with DoD Instruction 5000.2, a cost and operational effectiveness analysis should be prepared by the DoD Component responsible for the mission area in which an operational deficiency has been found. The following paragraphs discuss the existing and planned aircraft that had the potential to satisfy the Guard's mission requirement.

Use of C-130 Cargo Aircraft for Counterdrug Photo Reconnaissance. The Oklahoma and California ANG each have one C-130 aircraft that is equipped with a ramp-mounted camera system devised to support counterdrug photo reconnaissance missions. In FY 1993, the Oklahoma ANG flew 145.5 counterdrug hours in support of law enforcement agencies in Oklahoma, California, Nebraska, Texas, Louisiana, and Arizona. Records showed that the Oklahoma ANG responded in a timely manner to more than 90 percent of requests for support when flying hours and funding were available. California used the RF4-C aircraft in FY 1993, but planned to fly 282 counterdrug hours with the C-130 in FY 1994. Although the C-130 cannot match all the planned capabilities of the C-26, the C-130 ramp-mounted camera system is operationally effective in satisfying photo reconnaissance counterdrug missions because of its flying hour productivity and versatility.

The C-130 can fly at relatively slow speeds to ensure precise target identification. Moreover, the interior space and lift capacity of the C-130 can be easily modified for different cameras and emerging technologies. During flight, the C-130 air crew or photo imagery personnel can add film; identify and correct malfunctioning of the cameras; and change types of film, camera settings, and filters for several targets during the same mission. The ramp-mounted camera system that the 137th Air Wing built for its C-130 can be attached in about 20 minutes to the tail ramp of standard C-130H aircraft without modifications to the airframe. Although the C-130 is used for other missions, 112 C-130H aircraft in the ANG inventory could be equipped with the removable camera system to provide photo reconnaissance support to law enforcement agencies.

Potential Availability of C-130 Pacer Coin Aircraft for Counterdrug Missions. The Air Force is transferring four C-130 Pacer Coin aircraft to the ANG for use in counterdrug operations in FY 1995. At the time of the audit, the U.S. Southern Command was using the four aircraft.

The C-130 Pacer Coin aircraft flies low enough to provide high resolution photographs and is configured with day/night photo imagery, an infrared line scanner (aids in tracking of the target), electro-optical sensors, and forward-looking infrared radar sensors for photo reconnaissance and surveillance.

OH-58 Helicopters Planned for Use in the Counterdrug Mission. During the audit, the Army National Guard was modifying 76 OH-58 helicopters with thermal imagery system sensors to identify indoor marijuana crops, drug processing laboratories, or drug smugglers entering the United States. Those helicopters will be used in counterdrug Reconnaissance and Interdiction Detachments in 27 states by the end of FY 1994.

Requesting Immediate Modification of the C-26 Aircraft

The Counterdrug Directorate requested that the Chief, National Guard Bureau, approve immediate modification of the C-26 aircraft based on the National Security Analysts, Inc., study and on the 23 states' requests for the aircraft. Records kept by the Guard showed that 12 states either performed (in FY 1993) or planned to perform (in FY 1994) photo reconnaissance and surveillance missions. Those states informed us that they were using and would continue to use the Army National Guard UH-1 and the OH-58 helicopters with hand-held, 35-millimeter and video cameras; the OH-58+ helicopters equipped with infrared radar and film recording capability; the ANG C-130 cargo aircraft with a ramp-mounted camera system; and the Air Force RF-4C aircraft for more sophisticated aerial photography.[3] Because the states indicated that the capabilities of those aircraft adequately met mission needs, we concluded that an urgent need to field the modified C-26 aircraft did not exist.

In addition to the UH-1, OH-58 and RF-4C aircraft, the UC-26C aircraft supported photo reconnaissance and surveillance missions. The UC-26C, located at the 147th Fighter Group, Ellington Air Force Base, Texas ANG, supported law enforcement agencies in Texas and in 13 other states. Mission files on the UC-26C aircraft at the Texas National Guard Counterdrug Office indicated that only 3 of 52 missions requested in FY 1993 had not been flown due to scheduling conflicts.

[3]All RF-4C aircraft are scheduled to be retired by FY 1995 except those assigned to the 152nd RF-4C Reconnaissance Group in Reno, Nevada. The Reconnaissance Group has 18 RF-4C aircraft that could support the photo reconnaissance mission when not assigned to other missions.

Conclusion

The need to modify C-26 aircraft for use in photo reconnaissance and surveillance missions has not been validated. The C-130 cargo aircraft, the UC-26C and the RF-4C aircraft, and the OH-58 helicopters adequately satisfy counterdrug requirements for photo reconnaissance and surveillance capability. Furthermore, the one modified C-26 aircraft expected to be delivered in May 1994, and the four C-130 Pacer Coin aircraft expected to be transferred to the ANG in FY 1995 will enhance the already satisfactory capability to provide photo reconnaissance and surveillance support to law enforcement agencies.

Recommendations for Corrective Action

We recommend that the Chief, National Guard Bureau:

1. Notify the Air Force Materiel Command not to award the imminent contract to modify two C-26 aircraft.

2. Validate the requirement for additional aerial photo reconnaissance and surveillance capabilities for the counterdrug mission, and perform a cost and operational effectiveness analysis to determine the most cost-effective means of satisfying and validating mission need.

3. Eliminate the requirement for funds to modify the C-26 aircraft from the Counterdrug Program Objective Memorandum if the actions required by Recommendation 2. do not validate the need for modification.

Part III - Additional Information

Appendix A. Summary of Potential Benefits Resulting from Audit

Recommendation Reference	Description of Benefit	Amount and/or Type of Benefit
1.	Economy and Efficiency. Avoids unnecessary modifications and procurement costs.	Canceling the modification of two C-26 aircraft could result in funds of about $6.8 million* put to better use. ($6.26 million in FY 1992 funds and $0.54 million in FY 1993 funds).
2.	Internal Controls and Compliance With Regulations. Validates requirements before approval is granted to use counterdrug resources.	Nonmonetary.
3.	Economy and Efficiency. Avoids unnecessary modifications and procurement costs.	If plans to modify the other seven C-26 aircraft are canceled, costs estimated at $15.8 million* will be avoided in future years.

*Appropriation: 97X0350 - Guard and Reserve Equipment, Defense

Appendix B. Organizations Visited or Contacted

Departments of the Army and the Air Force

National Guard Bureau, Arlington, VA
- Counterdrug Task Force (Counterdrug Support Division), Arlington, VA
- Arizona National Guard
- Colorado National Guard
- Georgia National Guard
- Idaho National Guard
- Illinois National Guard
- Louisiana National Guard
- Massachusetts National Guard
- Nebraska National Guard
- Nevada National Guard
- New Mexico National Guard
- New York National Guard
- Tennessee National Guard

Department of the Air Force

Headquarters, Air National Guard
- Directorate of Acquisition, Arlington, VA
- Directorate of Financial Management, Arlington, VA
- Directorate of Counterdrug, Andrews Air Force Base, MD
- California Air National Guard, Sacramento, CA
- Texas Air National Guard
  - Headquarters, 147th Fighter Group, Ellington Air Force Base, TX
- Oklahoma Air National Guard
  - Headquarters, 137th Air Wing, Oklahoma City, OK

Headquarters, Aeronautical Systems Center, Wright-Patterson Air Force Base, OH
Big Safari Program, Air Force Materiel Command, Fort Worth, TX

Non-DoD Organizations

Lockheed Fort Worth Company, Fort Worth, TX
Fairchild Aircraft, Inc., San Antonio, TX

Appendix C. Report Distribution

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House Committee on Government Operations
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