**The below points are a rebuttal to the ACRC Tiger Team Preliminary Findings, dated 12 November 2014. v1.0**

1. ARI calls for 20 Active Component (AC) Attack Reconnaissance Battalions (ARBs) with no Guard ARBs, while transferring 111 Blackhawks to the Guard. The NGB Plan calls for 18 AC ARBs/6 NG ARBs while transferring 51 Blackhawks to the Guard. The difference is only a 2-3% ($89M-$176M) increase in total aviation operating cost that provides a 20% increase in combat power (4 more ARBs available).

It is unclear where AC is getting their math from. The cost per ARB is more likely$77m for an AC ARB and $32m for an NG ARB. Therefore, you save $154m by reducing 2 AC ARB and you spend $192m to keep 6 NG ARBs. The net is only a $38m cost per year to have 4 more ARB in the Guard Proposal. This is steady state, so if there are costs to spool up a NG ARB for deployment that would need to be added in. But it would still be significantly less in that year than the AC steady state cost of $77m. So the reality is the Guard option is more like a 1% cost increase for a 20% increase in combat power.

2. The Guard plan calls for a 1:4 dwell time for NG ARBs and requires 196 training days for a deployment (136 days during dwell time and 60 days post-mobilization). The AC disagrees with NGB’s assessment of 60 days mobilization train-up.

This is an issue that is clouded by UFTP. The last 5 ARB deployments from the Guard were in conjunction with Longbow fielding. Each of those 5 ARB commanders will tell you that the 4 months for both Longbow certification with 21st CAV and deployment validation with 1st Army was twice as long as needed. If you look at strictly 1st Army deployment validation, 60 days is likely 30 days too long – butabsolutely no more than 60 days is needed. Past practice doesn’t mean it was right, it was just what happened. The AC dictated this timeline, not the Guard. Oftentimes the NG ARBs were teaching the AC what right looked like since the AC trainers had little experience.

AH-64A model ARB deployments prior to Longbow UFTP and AZARNG UFTP had various timelines from 9 months or less. This indicates that 1st Army was still trying to figure out what right looks like and who is to say they got it right even now. If collective flight related mission training and other admin and green training were conducted home station, with pre-mob utilizing state staff and 1st Army oversight/validation, then costs of mobilization training time would come down significantly. Every state staff is manned and capable of doing this pre mob training, SRP and validation just like the AC Divisions do for their CABs.

3. Not in the slides, but all the Apache states provided NGB input on a 60 day mobilization model. The model is achievable by having a flying hour program based on mandated aircrew training requirements and by conducting gunnery prior to mobilization. To counter this, the AC will attack the NGB plan on the 60 day post-mobilization plan. They will use historical mobilization time-lines as their counter-point. As we know, the CAB/ARB mobilization plans were dictated to the Guard by the AC and, as in some cases the AC trained aviation brigade using an IBCT model.

4. ARI calls for leaving two battalion sets of aircraft for Korea rotations and remanufacture. The Guard considers these two full equipment sets out of operational units excessive.

Let the Guard take out of hide the remanufacture line like we have been doing. It is not a permanent situation and will end. As far as leaving 2 battalion sets in Korea, this is a nonsensical requirement. It basically is in place to eliminate Strat Air for the AC CAB that deploys each year to and from Korea. If they fall in on AC there, they leave AC at home with no-one using them. Those 2 battalion sets can stay in an operational Guard unit. It’s the same shell game we have been playing. The fleets would change hands between the AC and NG and within units, but it would only happen every 3 years based on the 10 AC CABs covering 3 deployments per year (CENTCOM, Europe and Korea). Better to change your fleet every 3 years than waste 2 battalion sets in storage. This would also ensure the AC fleet gets good maintenance on a regular basis as the NG would provide quality maintenance 3 of every 10 years.

5. A Guard ARB’s annual pre-deployment O&S\* (Operation & Support) costs are less than an AC ARB.Is this O&M (Operation & Maintenance) cost that AC used, as opposed to O&S?If so, isn’t this really part of the difference between $77m (AC) and $32m (NG) along with personnel costs (pay & allowance, health care, housing, BAS etc)?Regardless, a discussion of O&M costs is worth bringing up. Data out of AMCOM will prove that NG maintainers with their higher level of skill and experience use less Class IX as we are able to diagnosis and fix issues rather than pull and replace parts that may not be the problem.

6. Guard ARBs provide a place for highly experienced personnel coming off active duty to continue to serve.AC has worn out their aviators in 13 years of war and they have been leaving the Active Duty. The Guard was able to continue to use their previous Active Duty experience and training as Guard pilots during the war. That option won't be available in the future if ARI goes through.

7. Relative Combat Power of the Apache vice Kiowas(KW) and what does a CAB really need without KWs.ARI proposes to replace the ARS Squadron (OH-58D KWs) in the non-Heavy CABs with Apaches. This begs the question of how much combat power to conduct Security and Close Combat Attack (CCA) Missions does a CAB need? There is no requirement to provide a lost Recon capability as both the KW and Apache performed the same Security and CCA missions 99% of the time during OIF/OEF. The UAV is the only recon asset that will perform this mission for a CAB. ARI indicates that a KW has 80% the combat power of an Apache (24 Apaches vice 30 KW). If you take weapons load, station time, survivability, Aircraft Performance in high, hot and heavy, the Apache is a significantly more capable platform for security than a KW. So if a relative ratio of combat power is derived from these type criteria, likely the Apache is a 2 to 1 or better replacement for the KW. But even if it were a 60% ratio, by adding 18 additional Apaches to the CAB, each ARB would have 21 aircraft and no change to combat power. This is a more representative replacement ratio of Apaches for KW (18 vice 30) based on relative combat power of the 2 airframes. This would allow the Army 20 AC ARB, 8 NG ARB, 70 aircraft at Ft. Rucker and 32 aircraft for the remanufacture line/ORF. ARI is an arbitrary decision to take all Apaches with no analysis on what it takes to fill the void in Security and CCA Ops left by divestiture of the KW.

8. Accessibility of Guard ARBs.

One of the major concerns by AC, that they claim is addressed by ARI, is the accessibility of the low density high value system in the Apache. They claim the need to fight tonight. First, no conventional force fights tonight. The only AV force in the Army that may need to fight tonight is the SOAR. Second, the availability of Strat Air and Sea Lift will dictate the availability of AC units more than the BOG to Dwell and mobilization issues of an NG unit. Long before Strat Air and Sea lift is available to move a significant portion of AC CABs, Guard ARBs can have easily gone through post mobilization training. Finally, the past availability of NG ARBs was based on the patch chart, Longbow fielding andmobilization training timelines. The AC controlled all three of these variables and if they didn’t like the availability, it was their fault. For a future conflict, NG ARBs are fielded, UFTP complete or requirement waived and the patch chart and mob training can and should be changed to reflect a 1:4 BOG to Dwell and 60 day or less post mob validation schedule.

9. Ability to train for Decisive Action Operations.

One premise of ARI is that the AC is better suited to the complex training required for Apaches to participate in Decisive Action (DA) Operations. DA Ops is the new term for Full Spectrum Operations. The first point that must be taken into account is that the 6 of 8 NG ARBs that completed UFTP were certified by 21st CAV as trained and ready for Full Spectrum Operations (Decisive Actions). This training occurred at home station and during a mob window. If it happened once, it can happen again. Each state has ground units in their state. Many states have UAVs in their units as well as neighboring states. So complex air-ground integration training with Apaches and UAVs can and has been trained. Also, the Army’s primary method of training complex DA Ops is at the NTC. This is available to NG ARBs.

Second, the missions that an ARB conducts have not changed because we are transitioning from OIF/OEF to a period of training for a potential future conflict. By doctrine, an ARB conducts 4 types of missions: Reconnaissance, Security, Attack (Interdiction Attack and Close Combat Attack) and Movement to Contact. Since a Movement to Contact is planned and conducted as a Zone Reconnaissance, there are really only 3 missions an ARB conducts by doctrine – Recon, Attack and Security. Shortly after OIF began, 2 AC ARBs were rendered combat ineffective by the enemy in one night after an Interdiction Attack in the Karbala Gap. Thereafter, ARB training and focus moved almost exclusively to Security Operations and the other type of Attack Operation – Close Combat Attack (CCA). True reconnaissance has not and likely will not be conducted by Apaches. Rather, Apaches will conduct Recon only to confirm what is already known. During Decisive Actions against a sophisticated enemy, no one who wants to keep their Apaches flying will send them to recon an area they know nothing about. That mission will go to Recon assets starting in space, then to high altitude man and unmanned fixed wing, then to medium altitude manned and unmanned fixed wing and finally low altitude unmanned fixed and rotary wing platforms. Recon has been and will continue to be conducted by Apaches in low intensity conflicts with an unsophisticated enemy. So, the theory that NG units aren’t suited to complex training required for DA Ops is a fallacy as the NG ARBs have trained for this, been certified by the AC and continue to train to perform the doctrinal missions that will support DA Ops as well as Low Intensity Conflict Ops.

10. Apaches Have No Role in the National Guard’s Key Mission of Homeland Support.

Apache units have as much or more relevancy to the NG role in Homeland Support as an Armor, Cavalry or Artillery unit or Air Guard Fighter or Attack Aircraft unit. ARBs have as many Soldiers, generators and tents and more trucks and trailers for Homeland Support than any tracked vehicle Battalion. An Abrams tank, Bradley fighting vehicle or Paladin self propelled artillery piece will almost never be used in Domestic Operations, but an Apache can conduct aerial observation for infrastructure damage assessments, Search and Rescue as well as Aerial Command and Control to allow utility aircraft to be freed up for logistical movements. Although homeland support is a key role of the National Guard, it is not the Primary role of the National Guard. Constitutionally, the primary role of the NG is Homeland Defense. This is the single most important reason to keep Apaches in the NG, the Constitutional Intent for Separation of Powers while the Militia (Reserve Component) serves as the primary defenders of the nation.

Historically, the Reserve Component has been the larger portion of the Army as pre-WWII budgets would not allow for a large standing Active Army. As then COL Frank Tate testified in January 2014 to a sub-committee of the House Armed Services Committee, if it weren’t for Sequestration (a severe budget constraint) ARI would not be a proposed course of action for Army Aviation. So maybe a return to the historical affordability of our military is appropriate rather than gutting the combat power of the NG in favor of the Active Component.

\*O&S includes salaries, fuel, maintenance, HQ ops, civilian salaries/awards, travel funds, fuel, minor construction, operational military forces training, education, recruiting, deployment spare parts, base ops support, and other recurring costs.