



**NATIONAL GUARD BUREAU
1000 AIR FORCE PENTAGON, 4E126
WASHINGTON, DC 20330-1000**

20 August 2024

Maj Gen Duke A. Pirak
Acting Director
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Senator Sullivan,

Thank you for the opportunity to address your concerns regarding the impact of Fulltime Leveling (FTL) on the Alaska Air National Guard (AK ANG). After comprehensively researching the issue and reviewing the conclusions of a report and analysis conducted by the ANG staff, I have determined the following: 1) The AK ANG must be fully “excepted” from the FTL initiative; the unit manning documents for FY25 will be changed by 24 Aug 2024 to mirror FY24, 2) The AK ANG performs unique missions that require Active Guard Reserve (AGR) resources over and above that required for Organize, Train, and Equip (OT&E) which justifies this exception (see attached report), and 3) An increase in ANG AGR authorizations and funding of 576 to 25,909 would enable the ANG to equitably fund readiness across all missions without having to execute FTL. Furthermore, an increase of 3,767 to 29,100 would enable full mission readiness for the entire ANG enterprise.

The aforementioned report was a result of an ANG staff visit on 22-23 May 2024 in coordination with the AK ANG. In short, the report concludes the AK ANG executes four missions above OT&E requirements that are incompatible with Dual Status Technician (DST) resources. These additive missions are Personnel Recovery (PR) Alert, PR Rescue Coordination Center, Alaska Air Defense Sector, and Ground Based Missile Warning. While above ANG OT&E requirements, AGRs are necessary for these missions due to duty requirements to perform alert operations, the ability to automatically convert to Title 10 duty status, and perform shift work that are incompatible with DST resources and prohibited by ANG policy. Fulltime Leveling did not fully consider these requirements.

By 24 August, I intend to personally inform Maj Gen Saxe (Adjutant General AK), Lieutenant General Nahom (11 AF/CC), General Guillot (Commander NORAD/NORTHCOM), and General Schneider (Commander, PACAF) of my intent to forego full time leveling in Alaska. I greatly appreciate your concern, patience, and understanding in this matter.

Sincerely

A handwritten signature in cursive script that reads "Duke Pirak".

DUKE A. PIRAK, Maj Gen, USAF
Acting Director, Air National Guard

Attachment:

1. Fulltime Leveling Mission Impact Analysis for the Alaska Air National Guard

FULLTIME LEVELING MISSION IMPACT ANALYSIS FOR THE ALASKA AIR NATIONAL GUARD

PURPOSE: Provide the mission analysis conducted by the Air National Guard Readiness Center (ANGRC) on the impact of Fulltime Leveling on the programmatic mission requirements of the Alaska ANG (AK ANG).

BACKGROUND: The ANG implemented an initiative referred to as “Fulltime Leveling” (FTL) in Jan 2024 with associated manpower changes to take effect on 1 October 2024. The intent is twofold: to level the percentage of FT manpower resources of similar missions equitably across the ANG enterprise to meet readiness requirements, while living under manpower authorization limits provided by Congress. The ANG is funded at an average of 78% of the FT manpower requirement to organize, administer, recruit, instruct, and train (OARIT) across all weapons systems. Before applying FTL, some Wings were funded as high as 91% while others were funded as low as 69%. Standardized funding enables the National Guard Bureau (NGB) to understand gaps in capability and resourcing and then make data-driven decisions for programmatic change requests to Congress. Authorized FT manpower resources provided by Congress include AGRs, Title 32 Dual Status Technicians (DSTs), and Title 5 Civilians, all of which can be grouped and referred to as full-time equivalents (FTEs). A Congressionally mandated ceiling limits the number of AGRs, and the number of DSTs is limited by civilian-pay funds available to meet the Congressionally mandated minimum or floor. Active-Duty Operational Support (ADOS) and Military Personnel Account (MPA) are manpower funding substitutes that can be used to execute FTEs positions when filling Title 10 mission requirements.

The results of FTL for the AK ANG provide the state with an additional eight funded FT manpower resources. This resulted in the addition of 88 DSTs in exchange for 80 AGRs. This increase raises AK ANG’s FT manpower funding percentage from 81% to 82%. Most of the additional 4% above the enterprise average of 78% is due to FT manpower requirements for additional mission requirements which include Personnel Recovery (PR) Alert, PR Rescue Coordination Center (RCC), Alaska Air Defense Sector (AADS), and Ground Based Missile Warning (GBMW). These mission requirements are in addition to AK ANG’s in-garrison organized, train, and equip (OT&E) missions.

Upon receiving the results of FTL, the AK ANG raised concern about its ability to execute mission requirements given the conversion of many AGR resources to DSTs. These concerns included the ability to auto-convert personnel to Title 10 status for specific missions and the ability to recruit and retain DSTs.

In response to AK ANG’s concerns, two actions were immediately taken. First, the ANG provided 80 temporary AGR resources through 1 October 2025, in addition to the 88 DSTs that become effective 1 October 2024, to smooth the transition toward FTL’s end-state. Second, to understand these concerns and to ensure the state could continue successfully executing its missions, the ANGRC staff visited the state and conducted a mission impact analysis on 22-23 May 2024.

SUMMARY OF FINDINGS: The results of the ANGRC staff visit and internal review concluded that FTL decisions were appropriate for the baseline OT&E missions, but that Alaska should receive additional consideration for the additional programmatic missions above and beyond OT&E requirements. ANG commits to continued funding of these additional requirements through internal ANG Title 32 AGR resources.

Over the last 30 years, the AK ANG has been tasked with missions requiring FT manpower above and beyond OT&E requirements necessary to perform OARIT. The specific missions above OARIT requirements are PR Alert, PR RCC, AADS, and GBMW. These missions have been validated through Program Change Requests (PCRs) which programmatically transferred FT manpower requirements to NGB. FTL did not fully consider these mission requirements over and above OARIT. Each PCR provided the NGB a specific number of Officer and Enlisted manpower resources, both FT and traditional Drill Status Guardsmen. These PCRs expanded manpower requirements and authorizations of the NGB over the last 30 years, even though current Air Force programming and budgeting has unsuccessfully kept pace with all associated bills to adequately fund these additional mission requirements.

Additionally, due to unique duty status requirements of these missions, the loss of AGR resources directly impacts the AK ANG's ability to execute missions above OARIT requirements. FT positions for these additional missions have duty status requirements incompatible with DST resources. Unique mission requirements requiring AGR resources include alert duty, the ability to auto-covert to Title 10 status, recurrent Title 10 operations, and shiftwork – ANG policy prohibits performing these duties as a DST.

Given these validated and unique mission requirements, the missions above OARIT for the AK ANG should have been excepted from FTL.

Reference Appendix 1 for mission impact analysis for specific programmatic mission requirements for the AK ANG.

APPENDIX A:

AK ANG Programmatic Mission Requirements and Mission Impact Analysis due to FTL

A.1. **168th Wing (168WG):** Primary missions of Aerial Refueling with KC-135s, ground-based missile warning (GBMW), and required support forces.

A.1.1. Mission Requirement: Department of Air Force (DAF) assigned per Designed Operational Capability (DOC) Statement and associated Unit Type Codes (UTCs)

A.1.2. Funding: ANG Appropriation for OARIT, MPA for additive missions described below

A.1.3. FT Manning Requirement: Based on OARIT and defined by the Unit Manning Document (UMD) for OT&E missions

A.1.4. Analysis of FT Leveling Impact: **Restore FT manpower resources to pre-FTL for mission above OARIT.** KC-135 operations and aircraft maintenance are resourced equitably with other other KC-135 units.

A.2. **168WG - Tanker Alert:** Tasked to provide one tail and two crews plus aircraft maintenance support. Fulfills 100% of Alaska NORAD Region Alert in support of Operation NOBLE EAGLE (ONE).

A.2.1. Mission Requirement: Documented in ONE EXORD and GFMAP Base Order

A.2.2. Funding: Pacific Air Forces (PACAF) MPA

A.2.3. FT Manning Requirement: There is no ANG FT manning requirement for the Tanker Alert mission. All manning provided by PACAF MPA

A.2.4. Analysis of FT Leveling Impact: **No impact** – fully funded by PACAF MPA and manpower is robust compared with AMC funded alert sites (13 operations, 26 maintenance and 4 logistics personnel).

A.3. **168WG - Ground Based Missile Warning (GBMW):** 213SWS is primary force provider to the USSF's 13SWS providing support 24/7/365 for space operations.

A.3.1. Mission Requirement: 2020 MoA between Alaska, NGB, and USSF. The 2020 MoA passed the three-year renewal date on 10 April 2023, but it remains in effect until replaced. An updated MoA is currently in coordination

A.3.2. Funding: ANG Appropriation for FT manpower, USSF MPA for Title 10 requirements

A.3.3. FT Manning Requirement: NGB has been unable to locate the original funding document(s) for the creation of the 213SWS; therefore, source of FT manpower for the unit is undetermined. 2003 Site Activation Task Force (SATAF) sponsored FT manpower study determined 13 officer (13S) and 17 enlisted (1C6) space operators were required. These positions are provided MPA when mission requires Title 10 status.

A.3.4. Analysis of FT Leveling Impact: **Restore FT manpower resources to pre-FTL.** With no change of resources, this mission will be significantly impacted. FTL reduced officers from one below requirements to five below. Due to the shift work and Title 10 status requirements, DST status is incompatible for the five officer shortfall. Mitigation will require moving AGR-Os from another unit or increased MPA-O by up to ~1460. Enlisted support positions are able to absorb the conversion to DST without impacting mission.

A.4. **176th Wing (176WG):** Primary missions of PR with HC-130J, HH-60G, and Guardian Angel; Strategic Airlift with C-17 Active Association; Air Defense Command and Control, and required support forces.

A.4.1. Mission Requirement: DAF assigned per DOC Statement and associated UTCs

A.4.2. Funding: ANG Appropriation for OARIT, Program Change Request (PCR) directed for additive missions detailed in sections below

A.4.3. FT Manning Requirement: Based on OARIT and defined by the UMD for OT&E mission and PCR for additive missions

A.4.4. Analysis of FT Leveling Impact: **Restore FT manpower resources to pre-FTL for mission above OARIT.** Strategic Airlift (C-17) operations and aircraft maintenance are resourced equitably with other strategic airlift and critical support functions at other wings.

A.5. **176WG – Alaska Air Defense Sector (AADS):** 176th Air Defense Squadron (176ADS) is the Battle Control Center providing 24/7/365 command-and-control for ONE and Northern Sovereignty Operations (NSO) in support of NORAD and USNORTHCOM.

A.5.1. Mission Requirement: PCR 00-02 effective in FY01

A.5.2. Funding: ANG Appropriation (PCR directed)

A.5.3. FT Manpower Requirement: Set by PCR and updated in accordance with subsequent ANG Manpower Requirements Determination Studies

A.5.4. Analysis of FT Leveling Impact: **Recommend restoring FT manpower resources to pre-FTL.** With no change of resources, this mission will be minimally impacted. FTL added 10 DSTs and removed 11 AGR-Es. Although some positions within the 176ADS require AGR resources in order to auto-convert to Title 10, the 176ADS still has more AGR resources than required to fill the auto-convert positions and may utilize DSTs for non-kill chain positions. A manpower study is currently in progress to validate full-time manpower requirements and is anticipated to be completed by August 2024.

A.6. **176WG - PR Alert:** Conducts PR alert from two locations for ONE and NSO supporting NORAD; and Search and Rescue (SAR) support for training and exercise activities and civil SAR requirements in support of USNORTHCOM. Executed 24/7/365 at Joint Base Elmendorf-Richardson (JBER) and 12 hours per day, 5 days per week at Eielson AFB.

A.6.1. Mission Requirement: PCRs 93-06 and 95-02 effective in respectively in FY93 and FY95. A MoA dated 25 July 2011 between TAG AK and the Commander, 11th Air Force (PACAF) only details responsibilities for both JBER and Eielson AFB

A.6.2. Funding: ANG Appropriation (PCR directed)

A.6.3. FT Manning Requirement: Initially set by PCRs, updated on recurring basis

A.6.4. Analysis of FT Leveling Impact: **Recommend restoring FT manpower resources to pre-FTL.** ANGRC staff visit to AK determined 71 FT personnel (ops, maintenance, support) are required for this mission. FTL exchanged AGRs for DSTs for this mission and with no change of resources, this mission will be impacted. Alert missions require members to be in Title 10 status or to auto-convert from AGR. DST status is not authorized for alert duty status per ANGI 10-203. Mitigation requires moving AGRs from another unit or increased ADOS.

A.7. **176WG – Rescue Coordination Center (RCC):** 176th Operations Group (176OG) provides personnel to the RCC for the Commander, Alaska Command (ALCOM/CC) to plan,

coordinate, and control DoD participation in SAR operations in the Alaska Search and Rescue Region (SRR) per the National SAR Plan.

A.7.1. Mission Requirement: PCR 93-03 effective in FY94

A.7.2. Funding: ANG Appropriation (PCR directed)

A.7.3. FT Manning Requirement: Set by PCR and provides the following FT resources:

A.7.4. Analysis of FT Leveling Impact: **Recommend restoring FT manpower resources to pre-FTL.** FTL exchanged 4 AGR-Os for 1 DST and puts this mission at moderate risk if FT resources are not reallocated. Missions require members to be in Title 10 status or to auto-convert from AGR. DST status is not authorized for this mission per ANGI 10-203. Mitigation will require moving AGR-Os from another unit or increased ADOS-O. FTL on the RCC, combined with impacts to the other PR missions above, have a compounding effect on the Wing's ability to perform PR missions.