

ACQUISITION,  
TECHNOLOGY  
AND LOGISTICS**THE UNDER SECRETARY OF DEFENSE**3010 DEFENSE PENTAGON  
WASHINGTON, DC 20301-3010

MAR 9 2004

**MEMORANDUM FOR CHAIRMAN, HEADQUARTERS & SUPPORT ACTIVITIES  
JOINT CROSS-SERVICE GROUP****SUBJECT: Infrastructure Steering Group (ISG) Comments on the Headquarters & Support Activities Joint Cross-Service Group Draft Military Value Report**

The ISG has reviewed the draft Headquarters & Support Activities (H&SA) Joint Cross-Service Group (JCSG) Military Value Report, briefed to it on February 23, 2004.

The ISG appreciates the military judgment and dedicated effort that your members, as the experts in their field, put into the report. As you prepare your final report for formal coordination, please consider the following comments, consolidated from those submitted on behalf of ISG members. For your convenience, the original comments are also enclosed. Please note that general process comments provided by the Military Departments are for ISG consideration rather than your direct response. If the judgment of your group is not to incorporate any of the following suggestions, please provide a brief rationale in the memorandum transmitting your final report. Your final report is due to the OSD Base Realignment and Closure (BRAC) office on or before March 25, 2004. Additionally, please plan to attend the April 2, 2004, ISG meeting (1030-1230 in 3D1019) and be prepared to respond to any questions about your final report.

**General Comments**

The ISG discussed the need for the H&SA JCSG to clearly demonstrate how your military value approach evaluates the ability of the headquarters and support activities function to provide effective support to the war fighter. ISG members recognize the complicated and potentially contentious nature of your group's efforts, as well as the absence of historical guidance from previous BRAC rounds. Given those circumstances, consistency, clarity of effort, and easily understood logic are of primary importance as you finalize your report.

To the extent possible, the final report should be a complete, stand-alone document that contains the reasons for selecting attributes and metrics and assigning weights and scores, supported by official records of deliberation. Similarly, if your analysis relies on questions from the initial data call, the text of those questions, rather than just the reference number, should be included in the report.



The February 12, 2004, Federal Register notice providing the proposed final selection criteria makes a number of commitments related to how the Department will interpret and apply the final selection criteria. Please review this notice to determine if such commitments should be built into your military value approach. Additionally, please update the selection criteria and references thereto throughout the report to reflect the published proposed final criteria.

Your approach to military value would benefit from a sensitivity analysis using notional data to determine the viability of weights, scoring, and formulas in the report. A sensitivity analysis should point out where skewed and unintended results might occur, giving the H&SA JCSG the information it needs to make modification now. Your final report should discuss the results of the sensitivity analysis.

In the initial data call, installations were asked to identify each activity and building number with administrative space located on the installation. While the utility of this level of detail was questionable, installations were directed to respond to these questions as written. Because the complexity of some questions and the resulting data requirements for this data call may be more than installations can accurately support, please review the questions and resulting data requirements for the ability of an installation or facility to answer it within the time available. The H&SA JCSG should consider discussing with the Military Department BRAC organizations how the responses to the detailed questions will be used in the analyses. This may alleviate concerns that other detailed questions in the second data call will achieve analytical expectations.

Your final report should include a complete set of questions your JCSG will need to support the military value scoring plans. The questions should also clearly distinguish between those questions that have already been asked in the first data call and those that will be included in the next data call. Each JCSG will also be required to review the totality of its questions to ensure redundant questions are eliminated. Additionally, the second data call will provide an opportunity to include questions to support your capacity analysis that were either omitted in the first data call or, based on what you have learned through feedback from the query process, clarifying existing questions to ensure data received is consistent with your capacity analysis framework. These additional capacity-related questions should be included in a new section to your report.

As was done for the first data call, an Input Question Tool (IQT) will be provided to each JCSG through the Data Standardization Team (DST). Each JCSG and Military Department is required to submit their final questions in this tool, with appropriate amplification and references, no later than seven days after submission of their final report. The DST will provide guidelines for inputting questions in this tool, (e.g., tables are restricted to nine total columns –avoid submitting multiple questions in a single question, etc.). The DST review will vary from the one conducted for the first data call.

The primary focus of this review will be clarity, format (i.e., correct use of tables), and, to a smaller extent, duplication. Merging questions across JCSGs and the Military Departments is not the intent of this review.

In reviewing other military value reports, we have noticed the use of various dates for defining the data input boundary (e.g., POM 06, FY 03, etc.). To ensure the data received is consistent for analysis, we will be issuing policy that will define the cutoff dates that should be used in your analysis.

### Specific Comments

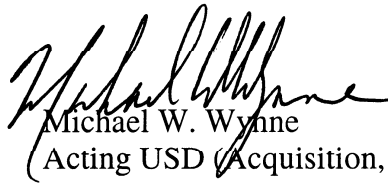
1. The guiding principals in your draft military value report indicate that one objective is to move “headquarters in leased space onto installations.” The scoring plans consistently imply that leased space will, in almost all instances, score unfavorably when compared to government-owned facilities. Please review your principles and common assumptions and consider providing amplification regarding leased space in relation to your analyses.
2. There remains general concern that the H&SA JCSG may be requesting information from activities not included in the initial data call. Specifically, your draft report contains a resubmission of question 446 in the initial data call, but now directed to activities above the installation and below the level of Major Headquarters. This appears to be inconsistent with the Army Major Headquarters Activity organizations your capacity report identified (in DoDD 5100.73 and Exhibit 22 of the President’s Budget). The ISG has recognized that there may be instances where a question in the initial data call may not have been sufficiently phrased to provide your JCSG with the data necessary to support your capacity analysis report. To this end, any questions contained in your scoring plan or needed to supplement your initial capacity questions that would solicit information from activities not previously identified in your capacity report should be clearly identified and a rationale provided for how it will be used within your capacity and/or military value analyses. Please review your report to ensure compliance with this guidance.
3. Service Ratio: Please review the question related to this metric for accuracy. As written, it appears the higher ratio 1 to 99 is a better answer than say 1 to 50, which does not seem logical. The grading may need to be reversed.
4. Civilian Personnel: Variable Base Operating Costs. Please review the question supporting this metric to ensure it clearly defines which personnel should be in the denominator: Military, Civilian, government contract, etc.

5. Fiber Network Architecture: Please consider editing the metric to reflect percentage of buildings connected as in the description paragraph (same comment applies to Fiber Network Architecture question on p. 70).
6. Continuity of Operations Metric: Requests number of Presidential declarations of disaster since 1965. Past occurrence of disaster in a 40-year time frame may be insufficient to determine probability of a disaster occurrence (e.g., 100 year flood plain). The information collected may provide little variation in this metric, which means it will add little discrimination to your model. Given these difficulties, and the low weight of 2%, the H&SA JCSG should reconsider the use of this metric.
7. Key Relationships in DC Area: As was discussed during your briefing to the ISG, please review this metric in light of its utility for measuring the need for an organization to be located in the NCR. If you decide to retain the metric, please consider identifying a more indicative means of measuring this relationship. Rather than asking about the number of scheduled meetings with senior leaders in Washington or with Members of Congress, consider an alternative metric to indicate the number of such meetings that were requested by the senior leaders or Members of Congress.
8. Quality of Life (QoL) Metrics: Basic Allowance for Housing (BAH), while an indicator of quality of life, is viewed by some to be a poor proxy for QoL criteria. In this model BAH is being used as a cost of living metric. If cost of living is desired to measure QOL, please consider using a cost of living index as in other models to reduce potential inconsistencies. Another possible resolution is to use the QoL Military Value attributes created by the DoD-level Joint Process Action Team for Criterion 7.
9. Percent of population with bachelor's degree within 30 miles of installation: Military installations may have trouble identifying a source of data to obtain information based on a radius approach. Please consider revising this metric to calculate using contiguous counties. The Census Bureau could provide such data based on the contiguous counties and the analysis could determine the percent of population that have bachelor's degrees by weighted average of the contiguous counties.
10. Facility Conditions. Many questions ask respondents to rate a particular facility as C1 to C4, without providing a DoD-wide definition of these ratings. Further, it is our understanding that the Navy does not use C-ratings and the Army and Air Force approaches to those ratings are inconsistent. Please consider explaining to respondents how to convert their different rating systems to one that will provide comparable results, similar to the method employed by the Supply and Storage JCSG.

11. COBRA as a source of data: Your report indicates that the COBRA model will provide certain data. The COBRA model is not a source of data. To the extent you need data, such as BOS costs, BAH, and cost of living indexes, please include these in your set of data call questions.
12. Metrics that ask for distances between two points need to clarify from what location the distance is measured (i.e., main entrance, building perimeter).
13. In finalizing your questions, please ensure terms are adequately defined across the Military Departments. For example:
  - a. Please review metric 1 for attribute 6 on page 21 to determine if a common definition for airport service is required.
  - b. Consider whether metric 2 for attribute 4 on page 31 should also identify capabilities, such as airlift, in addition to the distance to airport.
  - c. Page 42, Criterion 4, Attribute 2, Metric 1 should adequately define the term operating costs and what makes up such costs, possibly through Program Elements or other OSD accepted specific codes.
  - d. Where you use the term “conventional construction,” please ensure the amplification contains a definition for this term.
  - e. In Criterion 1, Attribute 2, Metric 1, Question 1 on page 69, please define administrative activities and operational activities.
  - f. Please consider providing a common definition for “public works directorate” and “public works staff.” Additionally, please review the metric clarifying how contract support will be measured.
14. Please consider whether the weighting for criterion 1 and 4 for Installation Management on pages 66 and 67 is appropriate. Your report conveys that cost efficiencies outweigh the mission capabilities and operational readiness.
15. Please explain how metric 4 on page 69 regarding the number of personnel measure supports the attribute? Please clarify whether students and/or staff are counted.
16. Please consider whether the attributes identified for criterion 1 on page 69 adequately measures the impact installation management organizations have on warfighting organizations off the installation (or overseas).

17. Consider capturing the support provided activities/installations contained in existing MOUs and MOAs for attribute 2, question 1 on Page 73.
18. Please replace the word “gas” with “has” in question 8 on page 82.
19. Please review questions in Section 3 of your draft report to ensure references to the capacity data call are replaced with the actual question text from the data call. For instance, question 10 on page 82 states, “What if any owned buildings identified in CDC #s 301 and 303 are temporary buildings.” The capacity data call will not be available to the installations to refer to. These questions should be drafted to stand alone.
20. Questions 22 and 23 on page 83 appear to be ambiguous regarding their application to Defense Agencies and Operating Activities. Please clarify the audience for the questions.

If you have any questions regarding these comments, please contact Peter Potochney, Director, Base Realignment and Closure Office, at 614-5356.



Michael W. Wynne  
(Acting USD (Acquisition, Technology & Logistics)  
Chairman, Infrastructure Steering Group

Attachments: As stated

cc: Military Department BRAC Deputy Assistant Secretaries



**DEPARTMENT OF THE ARMY**  
**OFFICE OF ASSISTANT SECRETARY**  
**INSTALLATIONS AND ENVIRONMENT**  
110 ARMY PENTAGON  
WASHINGTON DC 20310-0110

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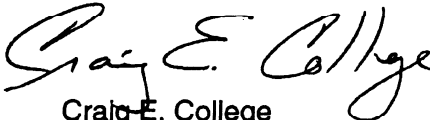
1 March 2004

MEMORANDUM FOR Mr. Peter Potochney, Director, BRAC Office, OUSD (AT&L)

SUBJECT: Headquarters and Support Activities (HSA) JCSG Military Value Analysis Report and ISG Briefing

1. I appreciate the opportunity to review the draft Military Value (MV) Analysis Report. In general, we found the report sufficiently detailed to understand the MV approach; the approach is generally sound and adequate to the task.
2. We are concerned that the level of detail required for some questions may be more than activities can accurately support. We provide examples in the attachment, and recommend the JCSG review their MV approach with this in mind.
3. The Army is concerned that the HSA is requesting activities that were not included in the Capacity Data Call to respond to questions during the Military Value Data Call. It was our understanding, per OSD guidance, that the responses to the capacity questions would permit the JCSGs to select which activities should answer the MV questions. The Army looks forward to working this list with the HSA JCSG.
4. Additionally, to offer our concurrence, we will need to review the final and complete list of questions and data elements (Section 3) that will be included by the HSA JCSG in Data Call #2. It would be particularly helpful to identify what portion of the data elements required for the MV Analysis were already acquired in Data Call #1.
5. TABS looks forward to continuing to work with the HSA JCSG on MV and other efforts.

Encl  
as

  
Craig E. College  
Deputy Assistant Secretary of the Army  
(Infrastructure Analysis)

CF:  
VCSA  
ASA (I&E)  
Mr. Tison, Chair, HSA JCSG

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**Specific Comments  
(By Functional Models)**

**Major Administrative HQs**

P. 13-14, Civilian Personnel: Variable Base Operating Costs. Recommend that the question supporting this metric carefully define which personnel should be in the denominator: Military, Civilian, government contract, etc.

P. 19, Fiber Network Architecture: Recommend HSA edit the metric to reflect percentage of buildings connected as in the description paragraph (same comment applies to Fiber Network Architecture question on p. 70).

P. 20, Continuity of Operations Metric: Requests number of Presidential declarations of disaster since 1965. Past occurrence of disaster in a 40-year time frame is insufficient to determine probability of disaster occurrence (e.g. 100 year flood plain). TABS environmental experts do not think this is an insightful metric. From a technical perspective, we would expect little variation in this metric, which means it will add little discrimination to your model. Given these difficulties, and the low weight of 2%, we recommend that HSA JCSG reconsider the use of this metric.

Page 21, Quality of Life (QOL) Metrics:

Basic Allowance for Housing (BAH) as QOL: BAH is a poor proxy for QOL criteria. In this model BAH is being used as a cost of living metric. If Cost of Living is desired to measure QOL, then Army recommends using a cost of living index as in other models to reduce potential inconsistencies.

Percent of population with bachelor's degree within 30 miles of installation: Recommend revising to calculate using contiguous counties. Our concern is that Census Bureau data will not provide such data for the 30-mile radius. The Army plans on determining the percent of population that have bachelor's degrees by weighted average of contiguous counties. This data can be provided to HSA.

Another possible resolution is that the HSA JCSG (as well as other JCSGs) use the QOL Military Value Attributes created by the DoD-level QOL Working Group for Criterion 7. This too, is an acceptable answer.

**Installation Management**

P. 68, Geographical Clusters: Question in draft report asks each installation to identify all DoD installations and their distance from the installation within 100 miles of the installation. This will determine where the installation management function is authorized for review under HSA's charter. In principle, this question

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should have been included in the Capacity Data Call so not all 99 Army installations would need to respond to all installation management questions. It also appears we do not have a standard for the number of installations within 100 miles that constitutes a “geographic cluster.” A better approach may be for the HSA JCSG analysis support team to use current technology to develop a standard, and then use such to identify installations within a geographical cluster. This approach may actually provide more accurate and timely data for the JCSG.

### **Headquarters and Support Activities**

P. 76. HSA has resubmitted original Capacity Data Call Question #446 in a manner that now directs the question to activities above installation and below the level of Major Headquarters. Activities that were not part of Data Call 1 (which focused on AMHA organizations identified in 5100.732 and President’s Budget exhibit 22). There are additional follow-on questions directed towards these activities.

The Army’s concern is the HSA JCSG may be requesting information from activities not included in Data Call 1. We understand this to be contrary to OSD guidelines. Recommend HSA JCSG request guidance on this issue from OSD.

At this time, HSA JCSG is unable to identify these specific activities or provide further clarification or reference documents. The Deputy Chair, HSA JCSG acknowledges that more work and discussion is needed in this area to identify activities and that HSA must be able to advise MilDeps which specific activities they want to respond. We look forward to working this issue with the HSA JCSG to identify respondents based on Data Call 1.

### **Central Data Bases**

Several questions request data that can be obtained through existing databases maintained by other federal agencies. To ensure consistency and accuracy, recommend these data sources be used rather than passing these questions to installations/activities for response.

Question 9 - BAH (04 w/12 yrs) – (DFAS). Not necessary if alternative OSD QOL attributes are used.

Question 16 - Cost of Living Index.

Question 54 - Civilian Locality Pay (OPM Web site).

Recommend that OSD, through the DST, direct all JCSGs to retrieve data available from existing federal databases from those sources, rather than burden the installations. Further recommend that the JCSGs and the services coordinate this data collection to reduce workload.

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### **Level of Detail Requested**

Questions concerning facilities are at the activity and building number level. In the Capacity Data Call, installations were asked to identify each activity and building number with administrative space located on the installation. Many installations registered a complaint that this level of detail was extremely time consuming and manpower intensive. The HSA JSCG was approached on several occasions to see if they would reduce their scope of efforts in this area, but in the end the installations were directed to respond to questions as written. Army desires to see how additional data at the building level will be used by HSA JSCG to conduct its MVA.

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**DEPARTMENT OF THE NAVY**  
**OFFICE OF THE ASSISTANT SECRETARY**  
**(INSTALLATIONS AND ENVIRONMENT)**  
 1000 NAVY PENTAGON  
 WASHINGTON, D.C. 20350-1000

01 March 2004

MEMORANDUM FOR DIRECTOR, BASE REALIGNMENT AND CLOSURE

SUBJECT: DON comments on the Headquarters and Support Activities Joint Cross-Service Group Military Value Report

We have conducted a detailed review of the draft Headquarters and Support Activities Joint Cross-Service Group Military Value Report, and provide the following recommendations to make the written report a more complete product.

Major Concerns:

1. Many of the most contentious decisions potentially impacting Combatant Commands, Service headquarters, and major support commands fall within the domain of the H&SA JCSG to assess. Clearer guidelines from OSD and the ISG should be provided to the JCSG to address these activities. Clearly defined imperatives from all services, as well as the ISG, to set boundaries of performance and mission criticalities are necessary to focus the efforts of the H&SA subgroups. This is particularly critical when rationalizing a headquarters' presence in the Washington D.C. area, which undoubtedly will be more than just an issue of whether or not they are in leased space and frequency of contact with senior officials.

2. We understand the military value data call will be handled as a targeted data call, with military value questions for a function/sub-function sent only to activities that perform that function. H&SA must have time to analyze the capacity data call responses to determine who is in the Washington D.C. area, who is in a geographic cluster, etc., in order to conduct its military value data call. As discussed at the 20 Feb 04 ISG meeting, all JCSGs need to make tentative decisions on what their universe of activities is, which can be confirmed by capacity data. Those who wait for the data prior to making any decisions will not be able to meet the deadlines.

Specific Recommendations:

1. The H&SA JCSG appears to be focusing more on Business Process Re-engineering (BPR) than reduction of infrastructure. However, review of the models and weighting reveal this is not being done consistently. For example, the Geographic Clusters scoring model fails to give credit to organizations that have already re-aligned to a more efficient consolidated regional support concept, such as the Navy Regions for base operating support. Conversely, the IT support/computing services model accurately rewards established economies of scale, which is the essence of the Navy and Marine Corps Internet (NMCI) re-alignment effort. Consolidated sites and support appears to be the overall intention, with low scores (less per installation) being good, rewarding economies of scale. Proper recognition of significant consolidations and cost saving successes should be incorporated consistently.

2. There are references to data that will be provided from "COBRA" such as BOS costs, BAH rate for an O-4, and cost of living indexes. Recommend additional collaboration with the

COBRA team, as these requirements do not align with the latest understood data collection intentions.

My office stands ready to further clarify these issues and assist in the implementation of the recommendations as necessary.



Anne Rathmell Davis  
Deputy Assistant Secretary of the Navy  
Infrastructure Strategy and Analysis



**DEPARTMENT OF THE AIR FORCE  
WASHINGTON DC**

**OFFICE OF THE ASSISTANT SECRETARY**

1 Mar 04

**MEMORANDUM FOR CHAIRMAN, INFRASTRUCTURE STEERING GROUP (ISG)**

**SUBJECT: Commentary on Headquarters & Support Activities (H&SA) Joint Cross Service Group (JCSG) Military Value Analysis Report**

**References: (a) OSDATL/BRAC E-mail 19 Feb 04; Review and Approval of JCSG Military Value Report  
(b) H&SA JCSG Military Value Analysis Report**

The H&SA JCSG Military Value Analysis Report has been reviewed per ISG direction. Our initial comments on reference b are provided at attachment one.

We have identified several cross-cutter issues that we believe affect more than one of the JCSGs.

- a. **Lack of Military Imperatives.** JCSG reports lack clearly articulated military imperatives and/or guiding principles. Absent these, there is no "bounding" of the JCSGs functions substantiating the reason for their existence, i.e., military requirement.
- b. **Confusion between capacity and military value.** There is confusion between capacity and military value and a tendency to define military value in terms of what the infrastructure could support efficiently (capacity-based) versus a capability assessment. Military value should be defined in terms of tangible improvement in operational capability effectiveness through an efficient combination of functions (mission-value based) and not be limited by infrastructure.
- c. **Military Value Analysis.** Each of the JCSG discussions of military value should include the following: the fact that their military value determinations should be based upon DoD military requirements, that a primary task to the JCSG is to determine where joint consolidation or restructuring can either add tangible military value to the Services or provide the same military value at a tangible net savings, and that JCSG will provide military value recommendations (or when driven by imperatives, basing recommendations) to the Services for incorporation to the overall Service-wide recommendations. Military value weighting schemes for JCSGs should indicate how the schemes would produce the above deliverables.
- d. **Selection Criteria Interpretation.** The Federal Register Notice of 12 Feb 04 makes a number of "promises" related to how we will interpret and apply the final selection criteria. Also, each Service and JCSG is interpreting the Selection Criteria to facilitate its analysis. How can the ISG be reasonably assured that these

interpretations are compatible? Without a sufficient and consistent methodology to match requirements to capability, military value remains undefined.


- e. **Attributes.** Each Service and JCSG uses different descriptions of attributes that comprise military value; one JCSG has a different attribute set for each of its subgroups. We recognize the attribute "buckets" cannot be fully congruent, but in several instances, the same attribute is described in several different ways. As this may prove problematic later in the BRAC process as we make comparisons and tradeoffs between and among Services and JCSGs, we recommend that the attributes be more standardized. Here's a proposed strawman:
  - Installation mission infrastructure ... e.g., in the case of the AF, things like runway and ramp and space launch
  - Installation combat service support infrastructure ... e.g., in the case of the AF, mobilization and base operations
  - Production and throughput ... e.g., sorties or students
  - Installation physical maneuver space ... e.g., in the case of the AF, airspace
  - Installation non-physical maneuver space ... e.g., in the case of the AF, electromagnetic spectrum and bandwidth
  - Ranges ... land, sea, air
  - Beneficial Relationships/Synergy ... operational, professional, joint/interagency
  - Geographical/Environmental Factors ... e.g., encroachment, weather, topography, proximity to mission and joint operations
- f. **Terminology.** We need to achieve a common understanding of the terms we're using, to include imperative, principle, military value, attribute names, and synergy.
- g. Ensure that military value questions in no way duplicate those in the capacity data call.
- h. **Facility Conditions.** The various Joint Cross Service Groups are using different methods and approaches to assess the condition of facilities on DoD installations. Therefore, there needs to be a consistent approach across all Joint Cross Service Groups to assess the condition of facilities.

Where there are principles that shape military value in a JCSG area of responsibility, the JCSG military value report should clearly state them. Air Force suggestions follow:

- a. **Agile Combat Support (ACS) requirements drive special basing considerations for the Air Force.** The Air Force needs to develop constellations of bases that can provide lateral support to each other so a wing continues to function with part of its normal ACS contingent deployed.

- b. When it improves military value or provides the same military value at a tangible savings, combine administrative headquarters with other services, agencies, or civilian organizations.
- c. Eliminate unneeded geographically separated units and operating locations as part of consolidation. Technological advances and changing threats have reduced the requirement for some of these locations, and because of the dedicated support necessary for these sites, the per-unit cost is frequently very high
- d. Optimize quality of life. Installations should provide for family stability and access for retirees who have honorably served their country.
- e. Realign basing structure to combine associate, active associate, operationally integrated and blended units when it makes sense for military effectiveness.
- f. For Reserve Component forces, bases must be sufficiently dispersed to attract talented volunteers and promote diversity, without sacrificing economies of scale.
- g. Unity of command is best achieved by vesting a single commander with the requisite authority to direct all forces employed in pursuit of a common goal; e.g. each military department managing the careers and assignments of their personnel.

We appreciate the opportunity to review the H&SA JCSG Military Value Analysis Report. You will find specific comments relative to this report attached. Headquarters AF POCs are myself (697-2524), and Ms Kathy Simonton (614-5791).

  
 MICHAEL A. AIMONE, P.E.  
 Deputy Assistant Secretary  
 (Basing & Infrastructure Analysis)

Attachment:  
 H&SA JCSG Military Value Report Comments

cc:  
 DASA (IA)  
 DASN IS&A  
 USD PA&E (Chair, H&SA JCSG)  
 SAF/AA (H&SA JCSG Principle)  
 AF/CV  
 SAF/IE

## Additional Air Force Comments to H&SA JCSG Military Value Report

1. General Comments:
  - a. The Air Force has one regional personnel center (AFPC, Randolph AFB, TX) that provides service in a total force fashion to both military and civilian members and their commanders. The categories used (civilian personnel offices, military personnel centers, and Geographic Clusters – military personnel) represent a different construct than what the AF has adopted as our operating model. Measurement of the sum of the parts may not equal the whole. Additionally, the resources devoted to personnel management may differ dramatically as a result of the activities performed under the “personnel roof”. Arguably, the AF has more resources invested in force development than other services. Could be an “apples to oranges” analysis leading to the wrong conclusions.
  - b. Compliance with DoD minimum antiterrorism standards for buildings: Clarify from what location the distances specified (distances to parking and roadways) will be measured. Additionally, define the term “conventional construction.”
  - c. Base Operating Support (BOS) requirements vary amongst services due to standards of service. The definition of BOS requirements also varies.
  - d. The various JCSGs are using different methods and approaches to assess the condition of facilities on DoD installations. Therefore, there needs to be a consistent approach across all JCSGs to assess the condition of facilities. This approach must be achievable by the Services within BRAC data call time requirements.
2. Page 3, para 1a: Disagree with metrics development methodology for selection criteria 1 through 4. Decisions to reorganize/realign Installation Management (IM) functions will have a measurable impact on operational readiness and the AF’s ability to support combat operations. (Both within the USAF and Joint operations). This should be an inherent part of Military Value analysis
3. Page 3, para 1c: These assumptions generally view IM functions as “business” processes with little or no link to combat readiness and capability. Military value analyses must consider this aspect of USAF combat support.
4. Page 10, Criterion 1, Attribute 1, Metric 1 and 2: There is no standard measure of fill time. A zero to one range does not reflect military value. For example, civilian fill times may range from 20-30 days. Is a 30-day fill rate more than 100 times more valuable than a 30-day rate?
5. Page 11, Criterion 1, Attribute 1, Metric 2, Question 1: Scoring should be reversed (highest =0, lowest=1). Are contractors included? DoD standard only counts GS-2XX series.
6. Page 11, Attribute 3: Need to ensure this allows for the city basing initiative (for example: Brooks City Base, San Antonio, TX)
7. Page 12, Attribute 3, Metric 1, Question 2 and 3: Need to clarify from what location the distance is measured (i.e., main entrance, building perimeter). Need to define what “conventional construction” is.
8. Page 13, Criterion 4, Attribute 1, Metric 1: Locality pay is derived from Bureau of Labor Statistics (BLS) data, which OPM used in formulating locality pay. BLS data would be a better measure.



Additional Air Force Comments to H&SA JCSG Military Value Report

9. Page 14, Attribute 2, Metric 1, Rationale: Use of Base Operating Support (BOS) as a measure of efficiency is incorrect. BOS components are different in each service and can vary from year to year, as these have been locally discretionary funds. The BOS standards impacting Quality of Life (QOL) also impact overall costs.
10. Page 20, Criterion 1, Attribute 3: Measure focuses on quantity without regard to quality. Make clear who these questions apply to. If not limited, it's an unreasonable collection requirement. If it is limited, make clear the limits.
11. Page 21, Attribute 5, Question 1: Do not believe the percent of personnel who hold a Bachelor's Degree is applicable to QOL. Suggest measuring quality of education (schools, colleges, etc.) in the area. This is a big concern for military members.
12. Page 21, Attribute 6, Metric 1: Need a definition of level of airport service.
13. Page 22, Attribute 2, Metric 1: Assumption that leased space is more costly on the long run for operations may not always be correct (example: Brooks City Base is a lease from San Antonio expected to be a \$200M savings over 20 years).
14. Page 29, Attribute 2 (Metrics 1 and 2): See paragraph 8 above.
15. Page 31, Attribute 4, Metric 2: Distance to airport doesn't mean the airport has the capability to handle airlift.
16. Page 36, Attribute 1, Metric 1: Where is cost of military personnel captures? BLS data would be a better measure than locality pay. BOS should include contractor costs.
17. Page 42, Criterion 4, Attribute 2, Metric 1: Be specific when asking for "operating cost". Define by Program Elements or other OSD accepted specific codes.
18. Page 46, Attribute 2, Metric 1: May tie to civilian personnel performance. Not sure it's a valid measure. Should the workforce pool measure total labor pool or just certain occupations?
19. Page 67: The fact that Criterion 4 outweighs Criterion 1 presumes that cost efficiency outweighs mission capabilities and impact on operational readiness. IM functions in the USAF have a direct and large impact on our war fighting capability; and those of other services; hence Criterion 1 should outweigh Criterion 4.
20. Page 68, Criterion 1, Attribute 1, Metric 1: See paragraph 7 above.
21. Page 69, Criterion 1, Attribute 2, Metric 1, Question 1: Need to define administrative activities and operational activities.
22. Page 69, Criterion 1, Attribute 3, Metric 1: Generally attributes 1-3 tend to measure Criterion 1 with respect to impact on organizations on the installation. It does not consider the impact these IM organizations have on war fighting organizations off the installation (or overseas).
23. Page 69, Metric 4: Not sure the measure of number of personnel supports attribute? Needs clarification as to whether students and/or staff are counted.
24. Page 72, Criterion 4, Attribute 1, Metric 1: Need to define what a "public works directorate" and "public works staff". How will you measure contract support (could vary over time)? This also presumes that the more square feet per person, the better. This ratio is not easy to calculate across all services because USAF maintains its wartime combat support forces in peacetime IM organizations.

**Additional Air Force Comments to H&SA JCSG Military Value Report**

25. Page 73, Attribute 2, Question 1: Ensure support agreed to under MOUs and MOAs are captured
26. Page 82, Question 8: Typo, replace the word “gas” with “has”
27. Page 83, Question 22 and 23: Do these questions not apply to Defense Agencies and Operating Activities?