

# United States Senate

October 8, 2024

The Honorable Frank Kendall, III  
Secretary of the Air Force  
U.S. Department of Defense  
1670 Air Force Pentagon  
Washington, DC 20330-1670

Dear Secretary Kendall:

I am writing to express both my concern and frustration with years of stalling and rejection on the part of the Air Force to deliver vital aerial refueling assets to Alaska and with the state of aerial refueling capacity across the joint force.

For ten years, my office has spent countless hours with DoD leadership discussing Alaska's strategic advantages vis-à-vis our adversaries. These advantages include Alaska's location on the seam of multiple combatant commands, its status as a gateway to the Arctic region, its world class aerial training grounds, and its indispensable role as a protector of the U.S. homeland from air and missile attack. Air Force and DoD leadership including you, Secretary Austin, Secretary Esper, General C.Q. Brown, and many others have affirmed these facts on the record in numerous hearings and meetings with me over the years.

To its credit, DoD has made great strides in fortifying Alaska since I became a Senator including by raising the number of fifth generation fighters located there to over 100 aircraft. However, Alaska-based pilots and support personnel cannot fully achieve their mission both as a deterrent to adversary aggression and as a quick response force to worldwide combat operations if their ability to fly is constrained by refueling capacity. While the number of fighter and support aircraft in Alaska has grown larger in recent years, the number of KC-135 tankers on hand has stayed the same at just eight primary aircraft assigned at Eielson AFB to the 168<sup>th</sup> Wing (AKANG). The demands on these assets have grown significantly.

In the last two months alone, Alaska-based Airmen have intercepted adversary aircraft on at least six occasions including the first Russian-Chinese bomber task force in the Alaska ADIZ, requiring them to fly nearly 2,000 miles round-trip on each sortie. Several of these intercepts happened over a period of just 24 hours. At the same time, Airmen from the 3<sup>rd</sup> Wing at Joint Base Elmendorf-Richardson (JBER) flew F-22 Raptors to the Middle East to respond to Iranian attacks on our Israeli allies. Finally, these response missions occurred in close proximity to large exercises like Red Flag, which often require refueling of not just fighter aircraft, but also C-17s, C-130s, E-3s, and allied aircraft. Often, aircraft are placed on high alert statuses for long periods in Alaska in response to real-world threats, requiring more assets placed on standby.

Conversations and briefings I have had with Air Force leadership regarding this operational tempo have made one thing clear: while our Airmen are performing spectacularly, strains on the aerial refueling mission in Alaska are of growing urgency and require the Air Force's attention.

Until recently, the Air Force offered two ways in which to correct this issue: finalizing its MOB 7 basing decision or active association. I will address both in turn.

First, I was incredibly disappointed to find out that the Air National Guard cut Eielson Air Force Base from consideration for the MOB 7 decision recently. My disappointment is fueled both by the long history of the discussions and commitments I've received from you and your predecessors regarding these decisions, and from the criteria chosen to score bases, which, in my view, is severely flawed.

Since 2016, I received a number of commitments from the current and past administrations to carefully consider basing of KC-46 aircraft in Alaska. Several of those commitments came from former Chief of Staff of the Air Force, General Goldfein; former Commander of TRANSCOM, General Lyons; and former Commander of NORTHCOM, General O'Shaughnessy who said he absolutely agreed with me on "the strategic value of having access to [KC-46 tankers] from Alaska."

In our discussions together since 2021, you committed to reviewing these KC-46 basing decisions with an eye towards the overall strategic and operational imperatives involved. Given this, I was concerned to see that you delegated the decision authority for selection of the MOB 7 basing to the new Acting Director of the Air National Guard (DANG) just eight weeks before the initial cut was made.

The decision to delegate this authority late in the process circumvents political accountability and is concerning enough if it were not for the Air National Guard's erred analysis of the Full-Time Leveling (FTL) program earlier this year. The MOB 7 decision required an extensive scoring system and analysis not unlike that of the FTL program, and I am concerned that you pulled yourself from a process that has equally erred analysis and needs your oversight.

For example, the basing criteria that the Air National Guard chose for its decision (a copy of which I have enclosed) puts the proverbial "cart before the horse" as categories like "Mission" and "Capacity" contain considerations for infrastructure and operational support that are *already on site* at the future base. Given that the MOB 7 basing will not happen until the early-2030s, it makes very little sense that the National Guard would put such large weight on existing infrastructure, when MILCON projects could be funded and built in the interim.

Even more perplexing is that the Air National Guard chose criteria for "Manpower" such as "End Strength – Ops and Maintenance" and personnel "Fill Rate" while it simultaneously planned to engage in the FTL program that sought to cut manpower in Alaska. Due to my recent efforts, the FTL program is not an issue in Alaska, but the fact that this MOB 7 basing decision was scored with criteria the FTL decision was going to negatively impact gives me very little faith that this MOB 7 process was planned carefully. The same organization that previously decided to

cut Alaska's Air National Guard manpower should not also be scoring the MOB 7 decision on the very manpower it sought to cut.

Lastly, as a mission-driven organization, it worries me that the Air Force and National Guard chose to give the category "Environmental" the same weight in scoring as "Alert Commitment." Air quality, noise, and land encroachment should not be scored the same as preventing encroachment by a foreign adversary in the skies above our homeland. I trust that you agree.

I am asking that you review both your decision to delegate this authority to the Air National Guard and the criteria used for scoring before any final determination for MOB 7 is completed. This process needs your attention. I encourage you instead to consider an air base for the MOB 7 decision that puts real world mission requirements first and *then* ask that Congress authorize and fund the planes, infrastructure, and personnel that are needed to support those requirements.

The second solution offered by the Air Force to increase refueling capabilities in Alaska is active association. So far, action on that decision is delayed and I have little idea of where the Air Force ultimately stands on it at this time.

Following requests by me in 2021, Acting Secretary of the Air Force, John P. Roth, approved Eielson AFB as the preferred location to redistribute four additional active duty KC-135 aircraft to the care of the Alaska Air National Guard with an estimated execution date in 2023. I also received a commitment from Acting Secretary Roth and then Chief of Staff of the Air Force, General C.Q. Brown, that I would receive ongoing notifications regarding the KC-135 beddown process at Eielson to include any improvements the Air Force needed to support the beddown.

Since the active association decision was made three years ago, we have received many mixed messages from the Air Force and Air National Guard regarding its progress. For example, I heard that National Guard representatives told citizens of the surrounding Eielson community recently that the task force assigned to complete a study of the base for active association is delayed or cancelled. I would like to know if this in fact the case.

I likewise heard that a housing shortage near the base is potentially preventing active association. Leaders on the ground with knowledge of the housing situation, however, believe that the market is actually healthier than the Air Force's analysis has shown. I would like an update on this issue from you.

Given the numerous commitments senior civilian and military Air Force leaders have consistently made to me, my state, and my constituents, as well as the strain on the mission set there, I respectfully request that you provide an explanation to me as soon as possible for the continued delay along with an estimate for the completion of this association. If Alaska will not be selected in the MOB 7 decision, then active association *must* happen to meet mission requirements in the Alaska ADIZ. You have committed to me on this issue several times, yet the issue remains. This is simply unacceptable.

Finally, I would like to address aerial refueling capacity as a whole across the joint force. I understand that the Air Force is at an inflection point when it comes to the decision of whether to buy new (and still delayed) KC-46 aircraft to bridge the gap to the Next Generation Air-refueling System (NGAS). I also understand that the KC-46 purchase is a recapitalization and therefore will replace the KC-135. My concern, however, is whether we have enough total tankers in the fleet to support strategic considerations outlined in the recent *Commission on the 2022 National Defense Strategy* report and whether we need to purchase more KC-46s on top of the 75 you are already considering purchasing.

Recently, I read that the joint force is using commercial aerial refueling contractors like the company "Metrea" to fill current requirements. It should bother all of us that a commercial business was so confident in our lack of refueling capacity that it purchased France's entire fleet of KC-135/C-135RG aircraft in July 2024, betting likely tens of millions of dollars on our increased shortfall. I heard that these aircraft supported mission requirements as recently as September 2024.

My question to you is: if we are using aerial refueling contractors to make up for a lack of aircraft in the air, then are we either divesting too quickly of KC-135 aircraft—or—should we consider buying more refueling airframes in the short term than what we have planned?

I look forward to discussing these topics as well as others like the Next Generation Air Dominance (NGAD) program with you as soon as possible. I realize that you face a number of difficult decisions in your job as Secretary of the Air Force, but I feel that the questions and concerns I have outlined here are among some of the most important our joint force face and warrant a discussion. I request we do so soon.

Sincerely,



Dan Sullivan  
United States Senator

Enclosure:  
KC-46A MOB 7 Basing Criteria - January 2024

cc:  
General Charles Q. Brown, Jr., Chairman of the Joint Chiefs of Staff  
General David W. Allvin, Chief of Staff of the Air Force



## CNGB Approved Basing Criteria

# KC-46A MOB 7 Basing Criteria

### Enterprise

ANG Installations with Unit Equipped KC-135

### Mission (50 pts)

- **Operations (8)**
  - Fuels Dispensing (Type III Hydrant) (4)
    - Quantity of Hydrants (3)
    - Age Condition of Hydrant System (1)
  - Fuels Storage (400k-1MM gallons) (2)
  - Fuels Receipt (20k-100k gallons/hour) (2)
- **Unit Performance (30)**
  - Unit Effectiveness Inspection Rating (7)
  - Maintenance Performance (7)
  - Manpower (16)
    - End Strength – Ops and Maintenance (7)
    - Retention % (2)
    - Fill Rate % (7)
- **Strategic Alignment (12)**
  - Alert Commitment (5)
  - Title-10 Mission Execution (7)

### Environmental (5 pts)

- Air Quality (2)
- Noise (2)
- Encroachment (1)

### Support of Military Families (8 pts\*)

- Public Education (4)
- Licensure Portability (4)

### Capacity (40 pts)

- **Operations (15)**
  - Squadron Operations Facilities (3)
  - Associate Squadron Operations Facilities (1)
  - Runway (6)
  - Ramp/Parking for 5 Aircraft (5)
- **Aircraft Maintenance Facilities (10)**
  - Aircraft Maintenance Hangar (5)
  - Fuel Cell Hangar (5)
- **Logistics Facilities (5)**
  - LRS – Supply Warehouse (3)
  - Small Air Terminal/Deployment Processing Center (2)
- **Training Facilities (5)**
  - WST Facility (2)
  - Fuselage Training Facility (2)
  - Comm Infrastructure (1)
- **Military Family Readiness (4)**
  - Housing (2)
  - Healthcare (2)
- BOS (1)

### Costs (5 pts)

- Area Construction Cost Factor (3)
- Area Locality Costs (2)
  - BAH Rate (1)
  - GS Locality (1)