

United States Government Accountability Office

**Report to Congressional Committees** 

April 2018

# PRESIDENTIAL HELICOPTER

VH-92A Program Is Stable and Making Progress While Facing Challenges

Revised May 9, 2018 to correct table 1 on page 4 and on the Highlights page. The heading of the first column should read: "then-year dollars in millions" rather than "billions."

## GAO Highlights

Highlights of GAO-18-359, a report to congressional committees

#### Why GAO Did This Study

The Navy's VH-92A program—also known as the Presidential Helicopter provides new helicopters for safe, reliable, and timely transportation for the President of the United States. The Navy plans to acquire a fleet of 23 VH-92A helicopters to replace the Marine Corps' existing fleet of VH-3D and VH-60N aircraft. Initial delivery of VH-92A helicopters is scheduled to begin in fiscal year 2020 with production ending in fiscal year 2023.

The Naw's acquisition strategy hinges on three key factors: (1) utilization of a commercial aircraft, (2) integration of mature technologies, and (3) retention of Federal Aviation Administration (FAA) original airworthiness certifications to avoid costly total airworthiness recertification.

The National Defense Authorization Act of 2014 included a provision for GAO to report on the VH-92A program annually, which GAO has been doing since 2011. This report discusses (1) the cost and schedule status of the program and (2) challenges facing the program in system development.

To determine how the program is progressing, GAO analyzed program documents; and spoke with officials from the program, the Defense Contract Management Agency, contractors, and testing offices.

#### What GAO Recommends

GAO is not making any recommendations in this report, but will continue to monitor the potential for cost growth and schedule delays as the program responds to design changes and challenges meeting capability requirements.

View GAO-18-359. For more information, contact Michael J. Sullivan at (202) 512-4841 or sullivanm@gao.gov.

#### PRESIDENTIAL HELICOPTER

# VH-92A Program Is Stable and Making Progress While Facing Challenges

#### What GAO Found

The Presidential Helicopter (VH-92A) program's planned aircraft quantities and key schedule events remain stable, and the program's latest cost estimate shows a decrease of 2.4 percent, or about \$123 million (see table below). Contractor officials attribute these cost reductions to the small number of design changes, stable requirements, and efficiencies from cost saving initiatives.

VH-92A Program Quantities Remain Stable and Cost Estimates Have Decreased			
	April 2014 initial baseline	August 2017 latest estimate	Percentage change
Costestimate (then-year dollars in millions)			
Development	\$2,805.7	\$2,731.6	-2.6%
Procurement	2,379.0	2,330.3	-2.0
Total program acquisition	5,184.7	5,061.9	-2.4
Total program acquisition unit cost	225.4	220.1	-2.4
Expected total quantities (number of aircraft)	23	23	0%

Source GAO presentation of Navy data. | GAO-18-359

The program's stability is also attributable to the Nawy's acquisition strategy. The contractor, Sikorsky Aircraft Corporation is converting its existing commercial S-92A helicopter to VH-92A helicopters, as depicted below.



Source: © 2016 Sikorsky Aircraft Corporation, a Lockheed Martin Company (photos); GAO analysis of Navy program office information. | GAO-18-359

While the program has made progress, it continues to face development challenges that may adversely affect its ability to deliver fully capable VH-92A aircraft on time. Recently, the Navy and contractors have

- taken steps to address parts shortages and track any related delays;
- investigated the cost and schedule implications of a request to modify the forward door of the aircraft; and
- continued work to resolve issues related to electromagnetic event survivability and landing zone suitability.

Final resolution of these issues may not occur until after production start, currently scheduled for March 2019.

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#### Abbreviations

DCMA	Defense Contract Management Agency
EDM	Engineering Development Model
FAA	Federal Aviation Administration
MCS	Mission Communications System
SDTA	System Demonstration Test Article

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U.S. GOVERNMENT ACCOUNTABILITY OFFICE

441 G St. N.W. Washington, DC 20548

April 30, 2018

**Congressional Committees** 

The Navy's VH-92A program—also known as the Presidential Helicopter—provides new helicopters for safe, reliable, and timely transportation for the President of the United States and other parties as directed by the White House Military Office. The Navy plans to acquire a fleet of 23 VH-92A helicopters to replace the Marine Corps' existing fleet VH-3D and VH-60N aircraft. Initial delivery of VH-92A helicopters is scheduled to begin in fiscal year 2020 with production ending in fiscal year 2023.

We have reported on this program since 2011; for a list of prior reports, see related GAO products at the end of this report. The National Defense Authorization Act of 2014 included a provision that we report on the VH-92A program annually until the Navy awards the full-rate production contract.<sup>1</sup> This report discusses (1) the cost and schedule status of the program and (2) the challenges facing the program in system development.

To determine how the program is progressing in terms of its cost and schedule performance, we analyzed program documents (including the acquisition strategy and contractor progress reports). To understand potential program challenges and steps taken to address those challenges, we discussed the program's status and risk management with the VH-92A program officials, officials from the Defense Contract Management Agency (DCMA) as well as contractors—Sikorsky Aircraft Corporation, a Lockheed Martin Company (the prime contractor for the program).<sup>2</sup> We interviewed program officials from the Navy's Presidential Helicopter Program Office, as well as officials from the offices of the Director, Operational Testing and Evaluation, and Department of Defense, Developmental Test and Evaluation to better understand the test and evaluation aspects of the program.

We conducted this performance audit from August 2017 to April 2018 in accordance with generally accepted government auditing standards.

<sup>&</sup>lt;sup>1</sup> Pub. L. No. 113-66, § 252 (2013).

<sup>&</sup>lt;sup>2</sup> In November 2015, Lockheed Martin acquired Sikorsky Aircraft Corporation.

Those standards require that we plan and perform the audit and obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

The Marine Corps uses a fleet of 23 helicopters to support the President in the national capital region, and when traveling in the continental United States and overseas. These aircraft have been in service for decades. In April 2002, the Navy began development of a replacement helicopter later identified as the VH-71 program. By 2009, schedule delays, performance issues, and a doubling of cost estimates from \$6.5 billion in 2005 to \$13 billion in 2009, prompted the Navy to terminate the program.

The need for a replacement helicopter remained, and in 2010 the VXX Presidential Helicopter Replacement Program was started. By April 2012, the Office of the Secretary of Defense (OSD) approved a new Navy acquisition approach. The Navy's acquisition strategy hinges on three key factors: (1) utilization of an in-production commercial aircraft, (2) integration of mature technologies, including a government-owned mission communications system (MCS) design,<sup>3</sup> and (3) retention of Federal Aviation Administration (FAA) original airworthiness certifications to avoid costly total airworthiness recertification.

In May 2014, the Navy awarded a fixed-price incentive firm target contract to Sikorsky Aircraft Corporation, a Lockheed Martin company, to develop the VH-92A Presidential Helicopter, which is based on Sikorsky's S-92A commercial helicopter. This contract type includes a ceiling price that limits the maximum amount that the Navy may pay the contractor under the contract, subject to other contract terms. The VH-92A is expected to provide improved performance, survivability, and communications capabilities, while offering increased passenger capacity when compared to the legacy helicopters.

Sikorsky is taking aircraft from an active production line (at the Sikorsky plant in Coatesville, Pennsylvania) to a dedicated VH-92A modification

<sup>&</sup>lt;sup>3</sup>The program contains no critical technologies, due to its use of an existing helicopter and components. However, the program is using a government-designed MCS, which is the only technology that is not in use in another aircraft in the same configuration as required for the VH-92A.

facility for subsystem integration at its plant in Stratford, Connecticut. When the aircraft arrives from Coatesville, some S-92A-unique components not required for the VH-92A, such as select circuit breaker panels, are moved. Subsequently, aircraft undergo modifications to support installation and accommodation of VH-92A-specific subsystems including the mission communications system racks and the wiring for MCS. According to program officials, the aircraft is then transferred to the Sikorsky facility in Owego, New York where integration of a mission communications system, painting, and contractor-led testing, executive cabin interior installation, and delivery of aircraft to the government will take place. See figure 1 for a depiction of the conversion of the Sikorsky commercial S-92A aircraft to the VH-92A presidential helicopter.

#### Figure 1: Conversion of the S-92A Commercial Helicopter to the VH-92A

Coatesville, Pennsylvania	Stratford, Connecticut	Owego, New York
<ul> <li>S-92A aircraft production</li> <li>Ferry flight to Stratford,Connecticut</li> </ul>	<ul> <li>Remove some S-92A aircraft components</li> <li>Modify S-92A integrate and install VH-92A-specific components</li> <li>Ferry flight to Owego, NY</li> </ul>	<ul> <li>Install and test mission communications system</li> <li>Paint aircraft</li> <li>Install executive cabin interior</li> <li>Complete Federal Aviation Administration airworthiness certification</li> <li>Deliver VH-92A helicopter to the government</li> </ul>

Source: © 2016 Sikorsky Aircraft Corporation, a Lockheed Martin Company (photos); GAO analysis of Navy program office information. | GAO-18-359

The VH-92A development program includes delivery of two Engineering Development Model (EDM) test aircraft and four System Demonstration

	flight of the first EDM aircraft took place July 28, 2017. The second EDM aircraft's first flight occurred November 11, 2017. The four SDTA helicopters are production representative aircraft, built under the development contract, and are now in the early modification stages.
VH-92A Program Remains Stable with Cost and Schedule Progressing as Planned	The VH-92A program is currently within its total program acquisition cost estimate and on schedule to meet major milestones. Since the start of the development effort, about 4 years ago, planned aircraft quantities and key schedule events have remained stable, and the program's latest cost estimate shows a total decrease of 2.4 percent or about \$123 million in development and procurement. Total program acquisition cost declined from an expected \$5.18 billion to \$5.06 billion, with program acquisition unit costs decreasing also by 2.4 percent. Contractor officials attribute the development cost reductions to the low number of design changes, no added requirements, and realized efficiencies from cost saving initiatives. Table 1 compares the initial and current quantity and cost estimates for the VH-92A program.

	April 2014 initial baseline	August 2017 latest estimate	Percentage change
Cost estimate (then-year dollars in millions)			
Development	\$2,805.7	\$2,731.6	-2.6%
Procurement	2,379.0	2,330.3	-2.0
Total program acquisition	5,184.7	5,061.9	-2.4
Total program acquisition unit cost	225.4	220.1	-2.4
Expected total quantities (number of aircraft)	23	23	0

#### Table1: Initial and Current VH-92A Program Quantities and Cost Estimates

Source: GAO presentation of Navy data. | GAO-18-359

The Navy's cost estimate has decreased over the past 4 years, which, according to the contractors, is primarily because the Navy has been able to limit the number of necessary design changes. To date, there have been minimal design changes that required modifications. Some of the modifications included the addition of formation lights, wireless antennas,

Test Article (SDTA) aircraft.<sup>4</sup> According to contractor officials, the first

<sup>4</sup>During the development phase, the VH-92A program will conduct risk-reduction activities, systems integration/engineering design work, test & evaluation procedures, and operator training.

and design changes to radios needed for wideband line of sight capability.<sup>5</sup> These changes are included in the modifications being performed at the Sikorsky facility in Stratford, Connecticut. The program office is gathering information for a design change to the upper-half of the forward door that will provide a less obstructive view of individuals entering or exiting the aircraft, and increase the field of vision of individuals entering or exiting the aircraft using the forward air stair door. Design, structural, and other analyses for this door effort are needed to ensure there would be no effect on the overall airworthiness certification for the aircraft.

In January 2018, Sikorsky reported it had accomplished about 63 percent of development work, leaving about 37 percent of work remaining to be completed over the next two years, when the development effort ends in October 2020.<sup>6</sup> At this point, DCMA's cost estimate at completion for the VH-92A program indicates a final price that will be lower than the ceiling price for the contract. Another indication of contractor cost performance is the use of its management reserve. The management reserve account is held for growth within the currently authorized work scope, for rate changes, and for unanticipated in-scope issues that become known during the program, including development. These funds are not used to offset accumulated contract overruns or underruns. According to DCMA, now that new discovery in system development is tapering off, it is reasonable to assume Sikorsky will be able to finish the contract with sufficient management reserve available to contract completion.

To control costs, the Navy and contractor have taken advantage of opportunities such as leveraging the FAA's airworthiness certification process, optimizing work processes, and reducing the movement of aircraft between contractor sites.

• Leveraging Federal Aviation Administration Airworthiness Certification Process: The Navy plans to determine production readiness through audits and inspections included as part of the FAA airworthiness certification process, which is used to determine if an aircraft is safe to operate. According to program officials, by relying on the procedures built into the airworthiness process, they no longer

<sup>&</sup>lt;sup>5</sup>Wideband line of sight capability provides high speed data links for situational awareness.

<sup>&</sup>lt;sup>6</sup>This represents the unclassified portion of the development contract.

needed to conduct their own separate production readiness review saving \$3 million, which will be reinvested into the program.

- Optimizing Work Processes: Sikorsky saved time and money by using, in some cases, modeling analysis rather than actual testing events. As previously reported, Sikorsky decided to certify the aircraft's de-icing capability using modeling analysis.<sup>7</sup> Sikorsky and other subject matter experts agreed that actual testing was not required and simulated analyses would suffice toward obtaining FAA certification. This revised approach resulted in a savings of approximately 2 months of schedule and \$3 million in cost associated with actual de-icing testing—all of which were applied to other activities within the contract. Similarly, Sikorsky saved about \$1.2 million by using modeling in certifying aircraft systems in a high intensity radio frequency (HIRF) environment rather than by the actual testing.
- Reallocating Development Activities between Facilities: Sikorsky achieved a total of \$10.7 million in savings, due to work cost reductions (worth an estimated \$7.5 million) and by reducing the number of flights between development facilities (resulting in savings of \$3.2 million). According to the contractors, these savings have been reinvested in the program.

The program appears on schedule to meet its major milestones.<sup>8</sup> In April 2016, we reviewed the program's Integrated Master Schedule (IMS) and compared it against best practices criteria in the GAO Schedule Assessment Guide.<sup>9</sup> At that time, we determined the schedule could be reliably used to define when and how long work will occur and how each activity is related to the others. We reviewed the IMS again this year and found that the quality of its data has decreased. As a result, slips to the program's critical path may not be as apparent as in the past.<sup>10</sup> Given the

<sup>7</sup>GAO, *Presidential Helicopter: Program Progressing Largely as Planned*, GAO-16-395 (Washington, D.C.:Apr.14, 2016).

<sup>8</sup>The program office acknowledge the production decision objective date, which is the approved most desired date, is now expected to occur 2 months later than planned—in March 2019 rather than January 2019. In addition, an OSD, November 2017, assessment of the VH-92A program predicts the production decision will be four months beyond its objective date (this is driven, in part, by previous production delays).

<sup>9</sup>GAO, *Schedule Assessment Guide: Best Practices for Project Schedules*, GAO-16-89G (Washington, D.C.: December 2015).

<sup>10</sup>The critical path is generally defined as the longest continuous sequence of activities in a schedule.

	change in the quality of the IMS data over the past 2 years and the fact that it raises questions about the program's ability to maintain schedule, we will continue to closely monitor this situation as the program progresses.
Program Is Addressing Some Developmental Challenges	While the program has made progress, the VH-92A program continues to face development challenges that could adversely affect Sikorsky's ability to deliver fully capable aircraft on time. Those challenges include parts shortages and potential design changes. The Navy and contractors have plans in place and have undertaken actions to meet these challenges. In addition, the program anticipates not meeting some capability requirements before entering production. Overall, these challenges impact Sikorsky's ability to deliver fully-capable aircraft on time and may affect cost and schedule.
	As of November 2017, DCMA has reported supplier delays in delivering some key components. For example, Sikorsky is experiencing significant parts shortages for the two SDTA aircraft undergoing modification at the Stratford facility (this includes components such as sheet metal and machined parts). As a result, according to the program office, Sikorsky has, in some instances, resorted to temporarily using parts that are awaiting qualification in place of VH-92A specified parts, which will be fully qualified when the FAA certification is obtained. According to DCMA, the parts shortages resulted in a 1-month work pause, but Sikorsky has since resumed modification of the two SDTA aircraft. However, as a consequence, Sikorsky now has three aircraft in the modification process at the same time and according to DCMA, this is putting a burden on needed parts and manpower. Further, DCMA officials explained that since the SDTAs are production representative aircraft, Sikorsky cannot deliver the SDTAs with substitute parts for acceptance by the government. As a result of the parts shortages, Sikorsky has missed several of its internal milestones during the aircraft build process. As contractor officials have reported, the program has been able to maintain the overall schedule through a number of work-arounds.
	To mitigate the parts shortages, Sikorsky has been conducting quarterly meetings with suppliers where they discuss supplier issues, corrective actions, and future actions needed to address the shortages. Sikorsky has also placed personnel on site at supplier locations to expedite the delivery of parts. If subcontractors are unable to improve their parts supply chain, continued challenges with parts shortages could further

delay government-integrated testing. The start of government testing has

slipped by 2 months to July rather than May 2018 as had been planned. In addition to this delay, if an initial production part fails during flight testing, the test event could pause, since there is a lack of replacement spares in stock to change out the failed part. This would further adversely affect the government's test plans. We have previously reported on design changes already experienced in the program;<sup>11</sup> they have contributed to reducing the amount of time available to complete government-led testing prior to the production decision. The program office now characterizes its integrated test schedule as aggressive and it's a risk factor the program office is tracking.

In addition, some performance requirements may not be fully achieved until after the production decision currently scheduled for March 2019. For example, the program is monitoring and managing development that could affect the aircraft's ability to meet requirements associated with operation in an electromagnetic environment, landing zone suitability, and the propulsion system. Below is additional information on each performance requirement.

- Electromagnetic Environment: Modifications have been made to ensure the VH-92A aircraft can operate in a degraded electromagnetic environment normally associated with a nuclear event. The program currently plans to complete system level electromagnetic environment testing in 2019, and is working to obtain initial results of that testing to support the program's production decision. However, until all solutions have been verified, there is a possibility the program will have to retrofit produced aircraft, which could lead to increased cost and schedule delays.
- Landing zone suitability: The White House South Lawn is the most frequent location utilized for helicopter operations in support of the President. The lawn is a highly visible, size-constrained landing zone where damage to the White House grounds needs to be minimized. Currently, however, the program is not meeting a key system capability requirement to land the aircraft without adversely affecting the landing zone (including the White House Lawn). The program expects to implement a solution for this about 5 months after the start of production. There is a possibility of increased cost and schedule delays if the program has to retrofit produced aircraft.

<sup>&</sup>lt;sup>11</sup>GAO-16-395.

VH-92A propulsion system: The VH-92A program is pursuing technical improvements related to the S-92A propulsion system, which has yet to meet a VH-92A performance requirement. According to program officials, they expect Sikorsky to complete the engineering analysis of solutions for meeting this requirement by October 2018. Should they not meet the aforementioned schedule, however, the program office does not intend to delay production and will continue working on a solution to support the start of Initial Operational Test and Evaluation, in December 2019.<sup>12</sup>

Finally, according to the program office, based on an inquiry from the Integrated Steering Group, <sup>13</sup> the program is investigating the cost and schedule impacts of modifying the forward door to provide greater visibility of individuals entering or exiting the aircraft. In anticipation of a request to do this modification, the Navy completed a trade study in May 2017 that provided rough order-of-magnitude cost and schedule implications of three possible approaches (minimal, moderate, and extensive structural modifications) with airworthiness considerations built into the design analyses. The moderate and extensive approaches were determined to be unacceptable and removed from further consideration. As follow-on to the trade study, the program is working with Sikorsky to develop detailed cost and schedule information for the remaining minimal modification option.

According to the program office, it estimates that a solution could be implemented, if needed, during the first lot of production aircraft. Before this change to the door, as with any new performance requirement, can be approved, it must be considered by a number of DOD governing integrated product teams or groups. As we have previously reported, the

<sup>&</sup>lt;sup>12</sup>An operational assessment (OA) will be conducted on operationally representative aircraft to provide a risk assessment of the aircraft to determine whether it meets requirements. The operational assessment will inform the low-rate initial production decision. In addition, Initial Operational Test and Evaluation (IOT&E) is conducted on production representative articles, to determine whether systems are operationally effective and suitable to support a full-rate production decision.

<sup>&</sup>lt;sup>13</sup>The Integrated Steering Group is one of the program's external governing bodies.

	program has a process for review and approval of requirements. <sup>14</sup> Program officials told us that the Integrated Steering Group considered the request for the forward air door modification and approved the change in January 2018. The Executive Steering Group, which has final decision authority for the VH-92A program, was notified of the approved performance requirement change. Now that this change is approved, the Navy is considering using a basic ordering agreement it has with Sikorsky separate from the VH-92A contract for work to complete the change and the program office is working with the contractor to determine the best time to make the modification to the aircraft in order to minimize impact on the production schedule. Modifications that begin after production of an aircraft is underway may result in the need to retrofit already-built VH- 92A aircraft.
Agency Comments	We are not making any recommendations in this report. DOD provided comments on a draft of this report, which are reprinted in appendix I. DOD also provided technical comments, which were incorporated as appropriate.

<sup>&</sup>lt;sup>14</sup>The program uses a management control process to govern requirement changes. It includes three governing bodies—the Capabilities Integrated Product Team (a working-level forum supporting the Marine Corps' desired operating capabilities); the Integrated Steering Group (ISG) representing both the requirements and user communities, and the Executive Steering Group (ESG), which is a senior oversight committee. When required, the ESG resolves critical issues and provides strategic guidance. The ESG also provides final decision authority for the VH-92A program.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Defense and the Secretary of the Navy. In addition, the report is available at no charge on the GAO website at http://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-4841 or sullivanm@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.

Michael J. Sullivan Director, Contracting and National Security Acquisitions

#### List of Committees

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# Appendix I: Comments from the Department of Defense

ASSISTANT SECRETARY OF DEFENSE **3600 DEFENSE PENTAGON** WASHINGTON, DC 20301-3600 APR 1 7 2018 Mr. Michael J. Sullivan Director, Acquisition and Sourcing Management U.S. Government Accountability Office 441 G Street, N.W. Washington, DC 20548 Dear Mr. Sullivan: This is the Department of Defense (DoD) response to the Government Accountability Office (GAO) Draft Report, GAO-18-359, "VH-92A Program is Stable and Making Progress While Facing Challenges," dated March 16, 2018 (Code 102260). The Department appreciates the effort of the GAO and the opportunity to comment on the draft report. The Department acknowledges receipt of the draft report and provided technical and security review comments. My point of contact is Mr. Tony Fish, at charles.a.fish4.civ@mail.mil or 703-695-0306. Kevin M. Fahey

## Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact	Michael J. Sullivan, (202) 512-4841 or sullivanm@gao.gov
Staff Acknowledgments	In addition to the contact named above, Bruce H. Thomas, Assistant Director; Marvin E. Bonner; Bonita J.P. Oden; Peter Anderson, Robin Wilson, and Marie Ahearn made key contributions to this report.

### **Related GAO Products**

Defense Acquisitions: Assessments of Selected Weapon Programs. GAO-17-333SP. Washington, D.C.: March 30, 2017.<sup>1</sup>

*Presidential Helicopter: Program Progressing Largely as Planned.* GAO-16-395. Washington, D.C.: April 14, 2016.

Presidential Helicopter Acquisition: Program Established Knowledge-Based Business Case and Entered System Development with Plans for Managing Challenges. GAO-15-392R. Washington, D.C.: April 14, 2015.

Presidential Helicopter Acquisition: Update on Program's Progress toward Development Start. GAO-14-358R. Washington, D.C.: April 10, 2014.

Department of Defense's Waiver of Competitive Prototyping Requirement for the VXX Presidential Helicopter Replacement Program. GAO-13-826R. Washington, D.C.: September 6, 2013.

Presidential Helicopter Acquisition: Program Makes Progress in Balancing Requirements, Costs, and Schedule. GAO-13-257. Washington, D.C: April 9, 2013.

Presidential Helicopter Acquisition: Effort Delayed as DOD Adopts New Approach to Balance Requirements, Costs, and Schedule. GAO-12-381R. Washington, D.C.: February 27, 2012.

Defense Acquisitions: Application of Lessons Learned and Best Practices in the Presidential Helicopter Program. GAO-11-380R. Washington, D.C.: March 25, 2011.

<sup>&</sup>lt;sup>1</sup>This report's assessment of the Navy's Presidential Helicopter Program constituted GAO's response to the annual reporting requirement for 2017, as required by the National Defense Authorization Act for Fiscal Year 2014.

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