

Report to the Chairmen, Subcommittees on Homeland Security, Committees on Appropriations, House of Representatives and U.S. Senate

June 2004

# COAST GUARD

Deepwater Program Acquisition Schedule Update Needed





Highlights of GAO-04-695, a report to the Chairmen, Subcommittees on Homeland Security, Committees on Appropriations, House of Representatives and U.S. Senate

### Why GAO Did This Study

In 2002, the Coast Guard began its \$17 billion, 20-year Integrated Deepwater System acquisition program to replace or modernize its cutters, aircraft, and communications equipment for missions generally beyond 50 miles from shore. During fiscal years 2002-03, Deepwater received about \$125 million less than the Coast Guard had planned. In fiscal year 2004, Congress appropriated \$668 million, \$168 million more than the President's request.

GAO has raised concern recently about the Coast Guard's initial management of Deepwater and the potential for escalating costs. GAO was asked to review the status of the program against the initial acquisition schedule and determine the impact of the additional \$168 million in fiscal year 2004 funding on this schedule.

#### What GAO Recommends

GAO recommends the Coast Guard update the original 2002 Deepwater acquisition schedule in time to support the fiscal year 2006 Deepwater budget submission to the Department of Homeland Security and Congress and at least once a year thereafter to support each budget submission. The updated schedule should include the current status of asset acquisition phases, interim phase milestones, and the critical paths linking assets. In written comments, the Coast Guard generally concurred with GAO's findings and recommendation.

#### www.gao.gov/cgi-bin/getrpt?GAO-04-695.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Margaret Wrightson at (415) 904-2200 or wrightsonm@gao.gov.

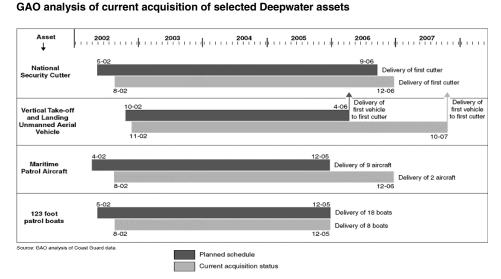
### COAST GUARD

### Deepwater Program Acquisition Schedule Update Needed

### What GAO Found

The degree to which the Deepwater program is on track with its original 2002 integrated acquisition schedule is difficult to determine because the Coast Guard has not updated the schedule. Coast Guard officials said they have not updated it because of the numerous changes Deepwater experiences every year and the cost, personnel, and time involved. However, in similar acquisitions—those of the Department of Defense (DOD)—cost, schedule, and performance updates are fundamental to congressional oversight. DOD is required to update the schedule at least annually and whenever cost and schedule thresholds are breached. In practice, DOD continually monitors and reports schedules for management on a quarterly basis. Updating the acquisition schedule—including phases such as design and fabrication, interim phase milestones, and critical paths linking assets—on a more timely basis is imperative so that annual Coast Guard budget submissions can allow Congress to base decisions on accurate information.

GAO used available data to develop the current acquisition status for a number of selected Deepwater assets and found that they have experienced delays and are at risk of being delivered later than anticipated.



The additional \$168 million in fiscal year 2004, while allowing the Coast Guard to conduct a number of Deepwater projects that had been delayed or would not have been funded in fiscal year 2004, will not fully return the program to its original 2002 acquisition schedule. Reasons include: all work originally planned for fiscal year 2004 was not funded and some will have to be delayed to fiscal year 2005; delivery of some assets has fallen so far behind schedule that ensuring their original delivery dates is impossible; and nonfunding reasons have caused delays, such as greater than expected hull corrosion of patrol boats delaying length extension upgrades.

\_\_\_\_\_ United States General Accounting Office

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#### Abbreviations

C4ISR	Command, Control, Communications and Computers, Intelligence, Surveillance, and Reconnaissance
Deepwater	Integrated Deepwater Systems program
DHS	Department of Homeland Security
DOD	Department of Defense
EVMS	Earned Value Management System
GAO	General Accounting Office
ICGS	Integrated Coast Guard Systems, LLC
IMS	Integrated Master Schedule
MPA	Maritime Patrol Aircraft
OPC	Offshore Patrol Cutter
UAV	Unmanned Air Vehicle

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United States General Accounting Office Washington, DC 20548

June 14, 2004

The Honorable of Thad Cochran Chairman, Subcommittee on Homeland Security Committee on Appropriations United States Senate

The Honorable Harold Rogers Chairman, Subcommittee on Homeland Security Committee on Appropriations House of Representatives

In 2002, the Coast Guard began the acquisition phase of the largest and most complex procurement in its history, the Integrated Deepwater System program (Deepwater). Under this program, the Coast Guard will replace or modernize its cutters, aircraft, and communications equipment used for missions generally beyond 50 miles from shore but which may start at ports, waterways, and coasts and extend seaward to wherever the Coast Guard is required to take appropriate action. In developing the program, the Coast Guard chose a contracting approach that relies heavily on a "systems integrator"—a contractor that will translate the Coast Guard's mission requirements into specific acquisitions and upgrades. This contracting approach also relies heavily on a steady, predictable funding stream throughout the program's anticipated 20-year acquisition span.<sup>1</sup> When the program began, we expressed concern that, given this approach's particularly heavy dependence on funding at planned levels, the Coast Guard risked schedule slippages and cost escalation if program funding fell short of planned funding amounts.<sup>2</sup> During the program's first 2 years (fiscal years 2002-03), the total amount of funding available was nearly \$125 million less than the amount the Coast Guard had planned and \$32 million less than the President's request. The Congress then increased the Deepwater appropriation for fiscal year 2004 to about \$668 million, or

<sup>&</sup>lt;sup>1</sup>The Deepwater program is scheduled to last for 30 years, the assets are expected to be delivered in the first 20 years, and the contractor is to be retained an additional 10 years to continue implementing the program.

<sup>&</sup>lt;sup>2</sup>See U.S. General Accounting Office, *Coast Guard: Progress Being Made on Deepwater Project, but Risks Remain*, GAO-01-564 (Washington, D.C.: May 2, 2001).

about \$86 million more than the agency's original plan for that year and \$168 million more than the President's request.

You asked us to assess the Deepwater program's status in light of this increased funding. We focused our work on (1) reviewing the status of the program against the initial acquisition schedule and (2) determining the impact of the additional \$168 million in fiscal year 2004 funding on returning the program to this schedule. You also asked us to provide information on the Coast Guard's status in revising Deepwater's mission to meet increased homeland security requirements and the amount of assistance the Department of Defense (DOD) has provided for Deepwater from fiscal years 2002 to 2004. On March 12, 2004, we briefed your offices on the preliminary results of our work to date. This report and the briefing slides in appendix I provide our final results.

Our work for this report involved reviewing and analyzing a variety of documents and interviewing officials from the headquarters of the Coast Guard and Integrated Coast Guard Systems, LLC, (ICGS). To determine the status of Deepwater's acquisition schedule for selected assets, we analyzed (1) the delivery task orders and their associated statements of work for individual Deepwater assets to establish what work was started, when it was started, and the period of performance for that work, and (2) the monthly assessment reports of Deepwater program managers on the performance of executing the delivery task orders. We compared these start and end dates of the delivery task orders with the acquisition schedule laid out in the original June 2002 Integrated Deepwater System Implementation Plan, which covers the first 5 years of the program. To determine the specific assets that were originally planned to have been funded by fiscal year 2004 but were not, we compared the Coast Guard's original plan listing the work scheduled to begin (contract line item numbers) for each fiscal year with the work that was actually begun (the delivery task orders that were issued for those line items). We interviewed Coast Guard and ICGS officials about the reliability of the data in the Integrated Master Schedule (IMS) management tool. On the basis of those discussions, we determined that the data within IMS were not reliable enough for use in our report. To determine the amount of funding support DOD provided to the Deepwater program from fiscal years 2002 to 2004, we interviewed officials and analyzed documents from the Navy. We also interviewed officials from other DOD components; however, they all referred us back to the Navy. We conducted our work from January through June 2004 and did our work in accordance with generally accepted government auditing standards.

### Background

In June 2002, the Coast Guard awarded a contract to ICGS to begin the acquisition phase of the Deepwater program. Rather than using the traditional approach of replacing classes of ships or aircraft through a series of individual acquisitions, the Coast Guard chose to employ a "system of systems" acquisition strategy that would replace its aging assets of ships, aircraft, and communication capabilities with a single, integrated package of new or modernized assets and capabilities. The focus of the program is not just on new ships and aircraft, but rather on an integrated approach to modernizing existing or "legacy" assets while transitioning to newer, more capable assets, with improved command, control, communications and computers, intelligence, surveillance, and reconnaissance (C4ISR) capabilities. At full implementation, the Deepwater program will replace the Coast Guard's entire fleet of current deepwater surface and air assets, comprising three classes of new cutters and their associated small boats, a new fixed-wing manned aircraft fleet, a combination of new and upgraded helicopters, and both cutter-based and land-based unmanned air vehicles (UAVs). In addition, all of these assets will be linked with state-of-the-art C4ISR capabilities and computers and will be supported by an integrated logistics management system.

ICGS, a business entity jointly owned by Northrop Grumman and Lockheed Martin, acts as the system integrator to develop and deliver the Deepwater program. They are the two first-tier subcontractors for the program and either provides Deepwater assets themselves or award second-tier subcontracts for the assets. The Coast Guard's contract with ICGS has a 5-year base period with five additional 5-year options. The Coast Guard is scheduled to decide on whether to extend ICGS's contract by June 2006, which is 1 year prior to the end of the first 5-year contract term. Although ICGS is responsible for designing, constructing, deploying, supporting, and integrating Deepwater assets, the Coast Guard maintains responsibility for oversight and overall management of the program. To help fulfill this responsibility, the Coast Guard uses several management tools to track progress in the program, such as monthly status reports called quad reports, a performance-based management tool called the Earned Value Management System (EVMS), and a schedule management system called IMS. The quad reports are monthly summaries of the work performed on the various deepwater assets and were developed to give managers a monthly progress report on the performance of the program in such areas as cost, schedule, and contract administration. EVMS is used to track cost and schedule for certain delivery orders that have been placed to manage the risk of the major assets and activities. IMS is a three-tiered, calendar-based schedule used to track the completion of tasks and milestones of the individual Deepwater delivery task orders. However,

data reliability with IMS has been an area of concern for the Coast Guard, and it is currently working with a private contractor and ICGS to address these concerns. Currently, the Coast Guard only maintains the lowest and most detailed level of IMS with monthly updates. These updates reflect the status of active contracts of individual assets and feed into EVMS's monthly cost performance reports of those individual contracts, which allow program management to monitor the cost, schedule, and technical performance of ongoing work at these lowest and most detailed levels.

In recent months, we have issued two reports that have raised concern about the Coast Guard's initial management of the Deepwater program and the potential for escalating costs. In March 2004,<sup>3</sup> we reported that key components needed to manage the Deepwater program and oversee the system integrator's performance have not been effectively implemented. We recommended that the Secretary of Homeland Security direct the Commandant of the Coast Guard to take a number of actions to improve Deepwater program management and contractor oversight. In April 2004,<sup>4</sup> we testified that the most significant challenge the Coast Guard faces as it moves forward in the Deepwater program is keeping the program on schedule and within planned budget estimates. We noted that the Coast Guard was at risk of having to expend funds to repair deteriorating legacy assets that otherwise had been planned for Deepwater modernization initiatives, which could potentially further delay the program and increase total program costs. We noted further that the Coast Guard's current estimate for completing the acquisition program within the 20-year schedule has risen to \$17.2 billion, an increase of \$2.2 billion over the original \$15 billion estimate.<sup>5</sup>

### Results

The degree to which the Deepwater program is on track with regard to its original 2002 acquisition schedule is difficult to determine, because the Coast Guard has not maintained and updated the acquisition schedule. The original acquisition schedule included acquisition phases (such as concept

<sup>b</sup>These amounts are in nominal (current-year) dollars.

<sup>&</sup>lt;sup>3</sup>See U.S. General Accounting Office, *Contract Management: Coast Guard's Deepwater Program Needs Increased Attention to Management and Contractor Oversight*, GAO-04-380 (Washington, D.C.: Mar. 9, 2004).

<sup>&</sup>lt;sup>4</sup>See U.S. General Accounting Office, *Coast Guard: Key Management and Budget Challenges for Fiscal Year 2005 and Beyond*, GAO-04-636T (Washington, D.C.: Apr. 7, 2004).

technology and design, system development and demonstration, and fabrication), interim phase milestones (such as preliminary and critical design reviews, installation, and testing), and the critical paths integrating the delivery of individual components to particular assets. However, while the Coast Guard has what is called an integrated master schedule, it currently uses it only at the lowest and most detailed levels and have not updated it to demonstrate whether individual components and assets are being integrated and delivered on schedule and in the critical sequence. There are a number of reasons why tracking the current integrated schedule on a major government investment or acquisition is important, but two stand out. First, our work has shown that it is important to identify potential risks in major acquisitions as early as possible so problems can be avoided or minimized. The ability to achieve scheduled events is a key indicator of risk. Second, cost, schedule, and performance are fundamental to the Congress's oversight of major acquisitions. In fact, by law, DOD's major defense acquisition programs have to report cost, schedule, and performance updates to the Congress at least annually and whenever cost and schedule thresholds are breached. In practice, schedules on DOD's major defense acquisitions are continually monitored and reported to management on a quarterly basis.

While Coast Guard officials indicated that the management tools they use are sufficient for tracking delivery dates throughout the acquisition, we found that these tools could not provide a ready and reliable picture of the current integrated Deepwater acquisition schedule. For example, IMS has had problems with data reliability and the monthly status reports, while assessing the progress of individual assets, do not translate those individual assessments into an overall integrated Deepwater acquisition schedule. In fact, the February 2004 status report noted that because there was no accurate overall integrated schedule for the command and control design phase, the linkages with the development of other assets were largely unknown. Although maintaining a current integrated schedule is a best practice for ensuring adequate contract oversight and management and is a requirement for DOD acquisitions, Coast Guard officials said they have not done so because of the numerous changes the Deepwater Program experiences every year and because of the cost, personnel, and time involved in crafting a revised master plan with the systems integrator on an annual basis. The officials said they have not planned to update the original acquisition schedule until just prior to deciding whether to extend the award of the next 5-year Deepwater contract in 2007. However, we have found that in acquisitions of similar scope—and in particular, acquisitions made by DOD-maintaining a current schedule is a fundamental practice that the department considers necessary.

While the Coast Guard could not provide us with an updated integrated schedule, we developed the current acquisition status of a number of selected Deepwater assets from documents provided by the Coast Guard. Our analysis indicates that several Deepwater assets and capabilities have experienced delays and are at risk of being delivered later than anticipated in the original implementation plan. For example, the delivery of the first two maritime patrol aircraft is behind schedule by about 1 year, and the delivery and integration of the vertical-take-off-and-land unmanned air vehicle to the first national security cutter has been delayed 18 months.

The \$168 million appropriated in fiscal year 2004 for the Deepwater program above the President's request of \$500 million will allow the Coast Guard to conduct a number of projects that had been delayed or would not have been funded in fiscal year 2004, but it will not fully return the program to its original 2002 acquisition schedule. Our analysis indicates there are several reasons for this result. First, even with the additional amount, the program still had a cumulative funding shortfall of \$39 million through fiscal year 2004, as compared to the Coast Guard's planned funding amount. Second, because part of the additional \$168 million was needed to start work delayed from fiscal year 2003, it did not provide enough funding for the delayed work and for all the work that the Coast Guard had originally planned for fiscal year 2004. As a result, some of this work will have to be delayed to fiscal year 2005. Third, the delivery of some assets has fallen so far behind schedule that it is impossible to ensure their delivery according to the original 2002 implementation schedule by simply providing more money. For example, according to the 2002 implementation schedule, nine maritime patrol aircraft were to be delivered by the end of 2005; according to the current contract, none will be delivered in 2005 and two will be delivered by the end of 2006. Similarly, the original schedule called for completing 18 123-foot patrol boat conversions by the end of 2005; according to the current contract, 8 will be completed by the end of 2005.<sup>6</sup> Fourth, the acquisition of some assets has been delayed for reasons other than funding. For example, greater than anticipated hull corrosion in the 110 ft. patrol boats has delayed the conversion of those into 123 footers and delays in the availability of faster satellite service for legacy cutters has delayed the delivery of those upgraded legacy cutters. Finally, in keeping with appropriations conference committee directives for how the additional

 $<sup>^6\!{\</sup>rm The}$  conversion is to extend the 110-foot patrol boats by 13 feet to incorporate a stern ramp.

amount was to be spent, part of the additional funding went for design of the offshore patrol cutter, work that, under the original schedule, would not begin for another 6 to 8 years. This work may speed up acquisition of these assets, but they were not on the original schedule this early in the program.

The Coast Guard is currently revising Deepwater's mission needs statement in response to increased homeland security requirements resulting from the terrorist attacks of September 11, 2001. According to the Coast Guard, in May 2004 it submitted the revised statement to the Department of Homeland Security's (DHS) Joint Requirements Council, which conditionally accepted it until the Deepwater contractor, ICGS, completes a new estimate of the costs needed to acquire the necessary functional capabilities resulting from the revised mission needs statement. The council further directed the Coast Guard to complete the new cost estimate in order to brief the DHS Investment Review Board in October 2004. Acting as an agent of the DHS, the board will approve any increases in the Deepwater total ownership cost associated with the revised mission needs statement and any growth in the Deepwater budget. Specifications for some specific Deepwater assets-most notably the National Security Cutter-will be changed in light of the Coast Guard's added homeland security responsibilities. Coast Guard officials said the main impact of the revision would be to close the gaps in Deepwater asset capabilities created by the expansion of Coast Guard mission requirement after September 11.<sup>7</sup>

Regarding DOD's assistance to the Coast Guard for Deepwater, the Navy budgeted \$25 million for the Deepwater program in fiscal years 2002-04, mainly to help outfit the National Security Cutter. The Navy budgeted these funds to provide capabilities and equipment it regarded as important for the Coast Guard to have for potential national defense missions that would be carried out in conjunction with Navy operations.<sup>8</sup>

<sup>&</sup>lt;sup>7</sup>An April 2004 RAND Corporation study concluded that the Coast Guard will need twice the number of cutters and 50 percent more aircraft to meet new national security requirements. U.S. Coast Guard's Deepwater Force Modernization Plan: Can it Be Accelerated? Will Meet Changing Security Needs?, The Rand Corporation, Santa Monica, Calif., April 2004.

<sup>&</sup>lt;sup>8</sup>Through a 1987 agreement, the Navy provides to the Coast Guard all Navy-owned, military readiness equipment and associated support materials that the Navy deems necessary to enable the Coast Guard to carry out assigned missions while operating with the Navy. Upon declaration of war, or when the President directs, the Coast Guard operates as a service of the Navy and is subject to the orders of the Secretary of the Navy.

The 2002 Deepwater acquisition schedule showed not only the individual planned phases and interim milestones for designing, testing, and fabricating assets but also the integrated schedules of critical linkages between assets. The absence of an up-to-date integrated acquisition schedule for the Deepwater program is a concern, because it is a symptom of the larger issues we reported in March 2004 that are related to whether this complicated acquisition is being adequately managed and whether the government's interests are being properly safeguarded. Since the inception of the unique contracting approach to this project, we have pointed out that it poses risks, in that it would be expensive to alter and, because of the unique "systems integrator" approach, does not operate like a conventional acquisition. The recent disclosure that, just 3 years into the acquisition, costs have risen by \$2.2 billion points to the need for a clear understanding of what assets are being acquired, when they are being acquired, and at what cost. This lack of such a current schedule lessens the Coast Guard's ability to monitor the contractor's performance and to take early action on potential risks before they become problems later in the program.

The Coast Guard has so far maintained that it is not worth the time and cost involved to update the acquisition schedule until just before the award of the next 5-year Deepwater contract, but we disagree. We recognize that there are costs involved with keeping an acquisition schedule updated. However, for Department of Defense acquisitions of such scope, maintaining a current schedule is a fundamental and necessary practice. Deepwater remains a program in transition, in that the Coast Guard is currently revising the program's mission requirements to include increased homeland security requirements. The major modifications that may result to key assets make keeping the program on track that much harder. As evolving mission requirements are translated into decisions about what assets are needed and what capabilities they will need to have, it becomes even more imperative that Coast Guard officials update the acquisition schedule on a more timely basis, so that budget submissions by the Coast Guard can allow DHS and Congress to base decisions on accurate information.

# Recommendation for Executive Action

We recommend that the Secretary of Homeland Security direct the Commandant of the Coast Guard to update the original 2002 Deepwater acquisition schedule in time to support the fiscal year 2006 Deepwater budget submission to DHS and Congress and at least once a year thereafter to support each budget submission. The updated schedule should include the current status of asset acquisition phases (such as

	concept technology and design, system development and demonstration, and fabrication), interim phase milestones (such as preliminary and critical design reviews, installation, and testing), and the critical paths linking the delivery of individual components to particular assets.
Agency Comments	We provided a draft of this report to DHS and the Coast Guard for their review and comment. In written comments, which are reproduced in appendix II, the Coast Guard generally concurred with the findings and recommendations in the report. The Coast Guard also provided technical comments, which we incorporated as appropriate.
	The Coast Guard, however, did not concur with three areas of discussion. First, the Coast Guard said that our draft report did not accurately portray its current acquisition tools and disagreed with our determination that data within one of those tools, the IMS, was not reliable enough for use in our report. As we noted in the report, at the time of our review Coast Guard officials expressed concerns about the reliability of IMS data, such as out-dated data and less than adequate data input and adjustment, and told us that they had hired a consultant to address those concerns. For that reason and with Coast Guard and ICGS agreement on our methodology, we based our analysis on the same source documents the Coast Guard uses as inputs to IMS's lowest, most detailed level. The Coast Guard stated in its written comments that while not in the form of an acquisition schedule, IMS's lower level data are reliable. According to its written comments, the Coast Guard is making improvements in updating IMS at all levels.
	Second, the Coast Guard said that we did not highlight that delays in the delivery schedule have been caused by a lack of funding and the subsequent need to sustain legacy assets rather than a lack of acquisition schedule updates. The scope of our review was to determine the impact of the additional \$168 million in fiscal year 2004 on returning Deepwater to its original 2002 schedule, not to determine effects of receiving appropriations that were less than requested in previous years. However, in explaining why the \$168 million will not return the Deepwater to its original schedule, we did note that part of the \$168 million was needed to start work delayed from fiscal year 2003, and that the acquisition of some assets had been delayed due to greater than anticipated hull corrosion in legacy 110-foot patrol boats causing the delay in converting them to 123-footers.

Finally, we did not intend to imply that the lack of acquisition schedule updates caused delays in delivery schedule. However, we continue to believe that not updating an integrated schedule to show the acquisition linkages between critical assets is a management concern. We believe in the importance of updating acquisition schedules at least annually not only as a best practice for managing and overseeing a complex integrated acquisition such as Deepwater but also as a up-to-date source of information on which DHS and the Congress can base annual budget decisions.

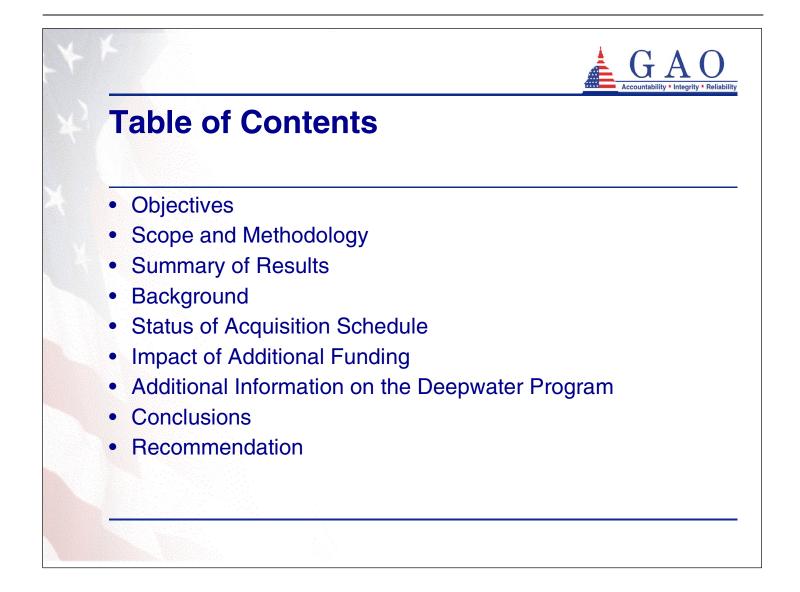
As agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 15 days from its issue date. At that time, we will send copies of this report to the Secretary of Homeland Security, the Commandant of the Coast Guard, appropriate congressional committees, and other interested parties. The report will also be available at no charge on GAO's Web site at http://www.gao.gov. If you or your staffs have any questions about this report, please contact me at (415) 904-2200 or by email at wrightsonm@gao.gov, or Steve Calvo, Assistant Director, at (206) 287-4839 or by email at calvos@gao.gov. Other key contributors to this report were Shawn Arbogast, Leo Barbour, David Best, Michele Fejfar, Paul Francis, Sam Hinojosa, David Hooper, Michele Mackin, and Stan Stenersen.

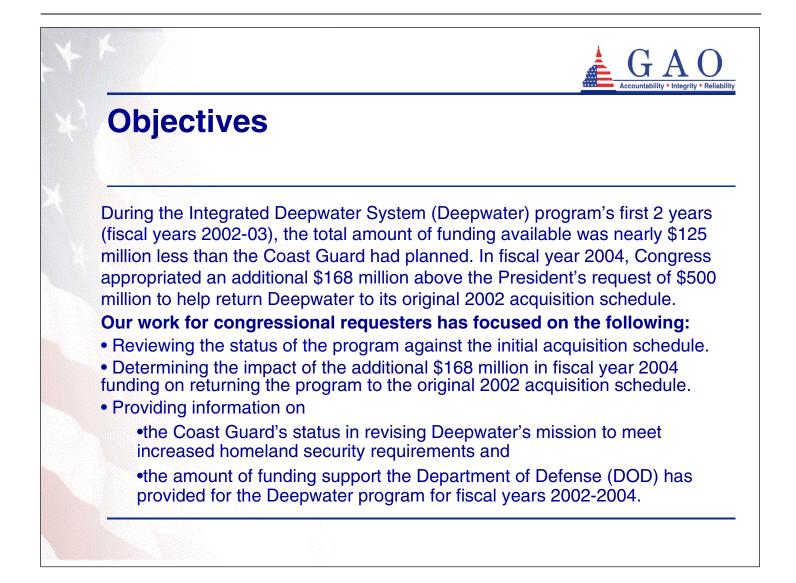
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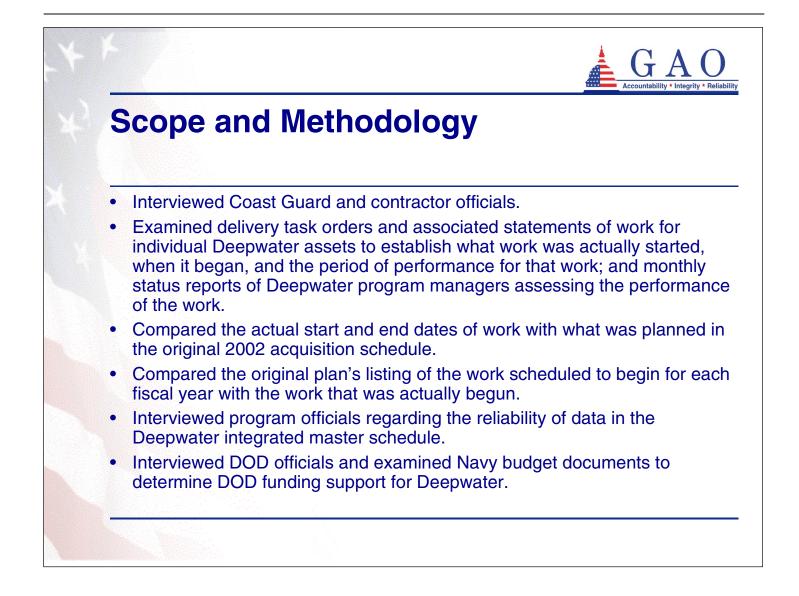
Margaret T. Wrightson Director, Homeland Security and Justice Issues

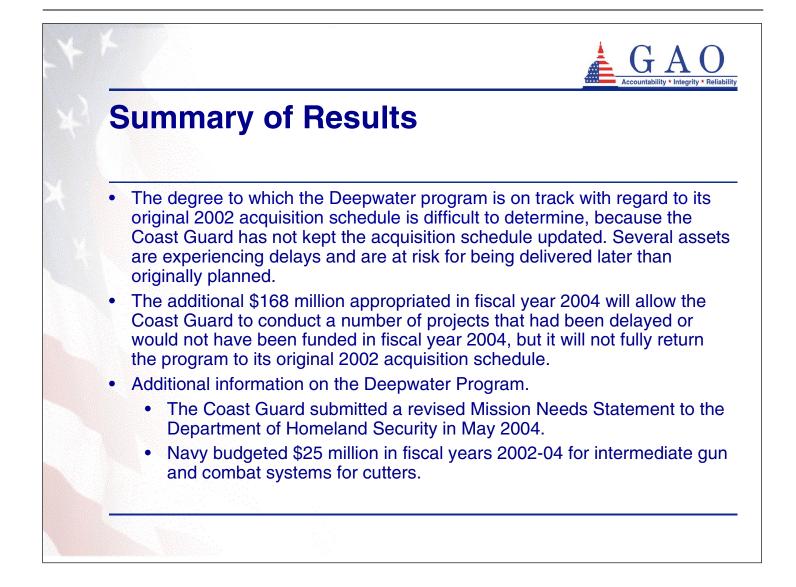
## Appendix I: Briefing Slides

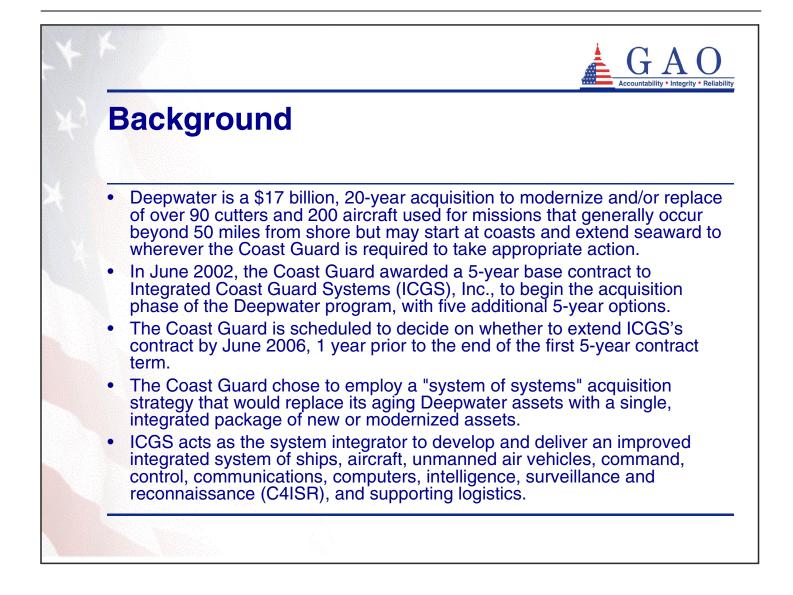


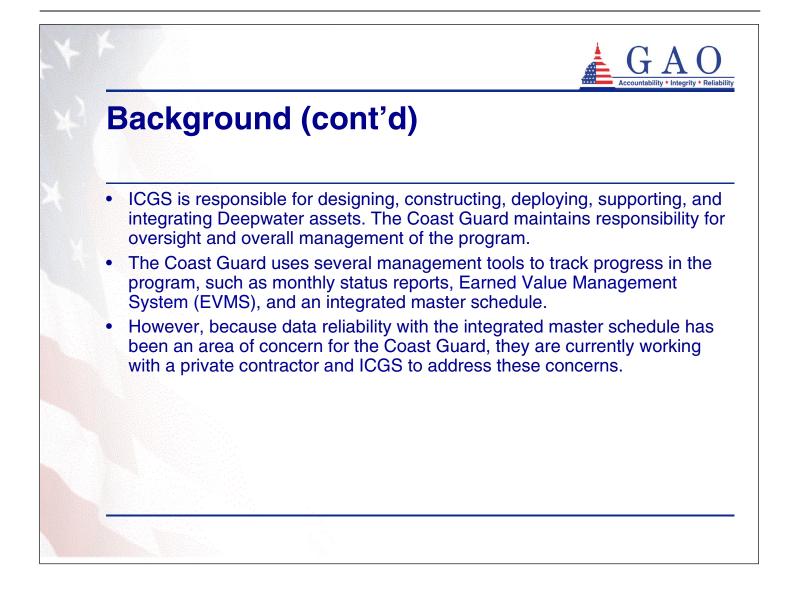


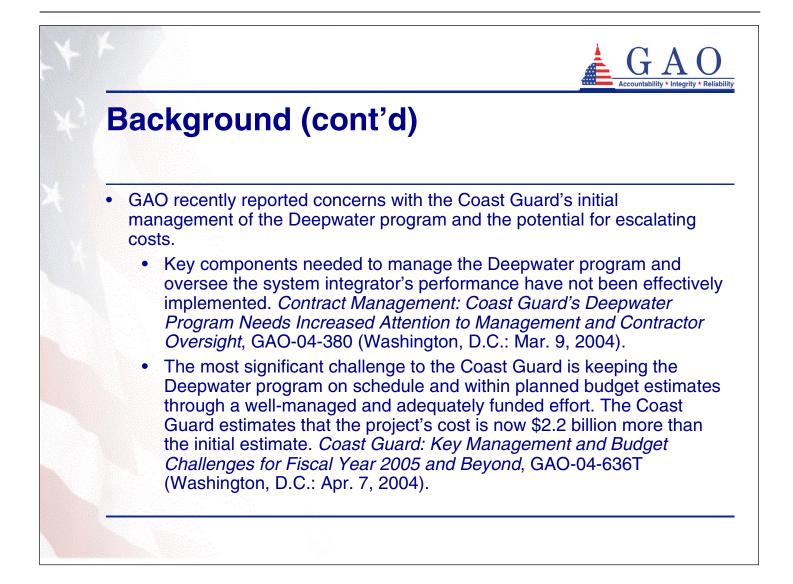


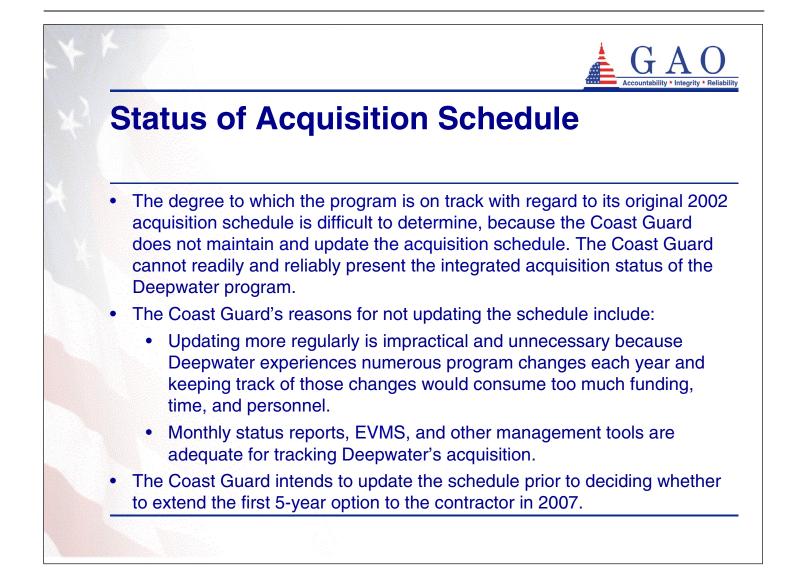


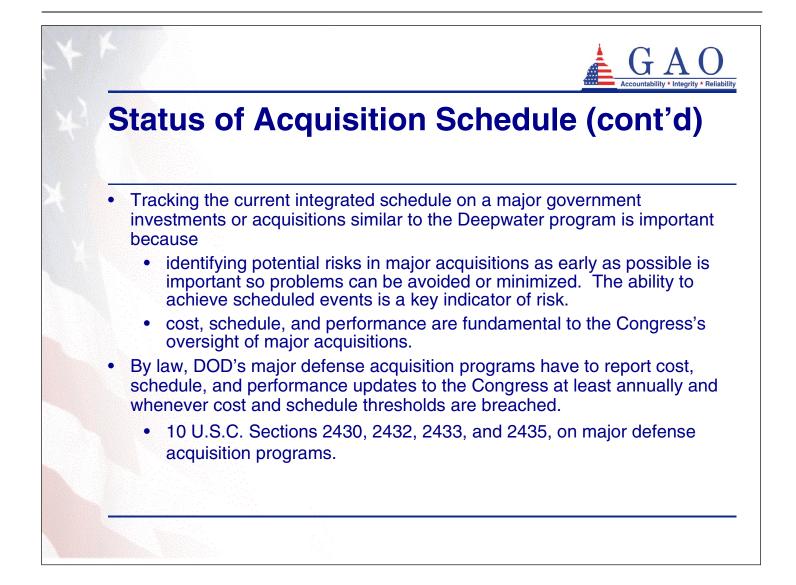


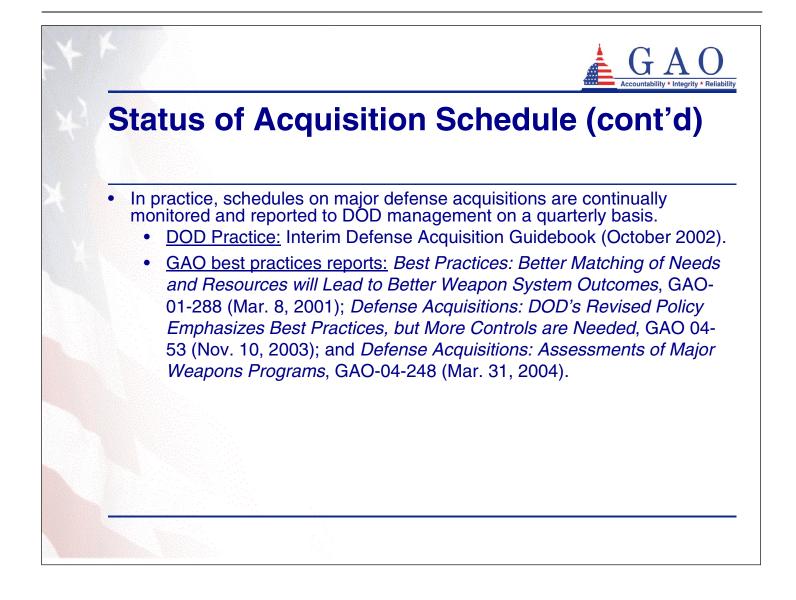


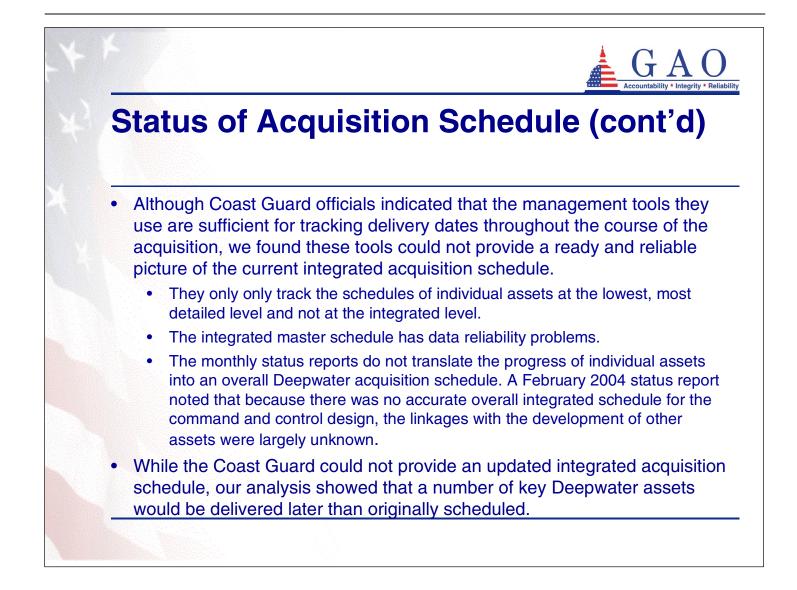


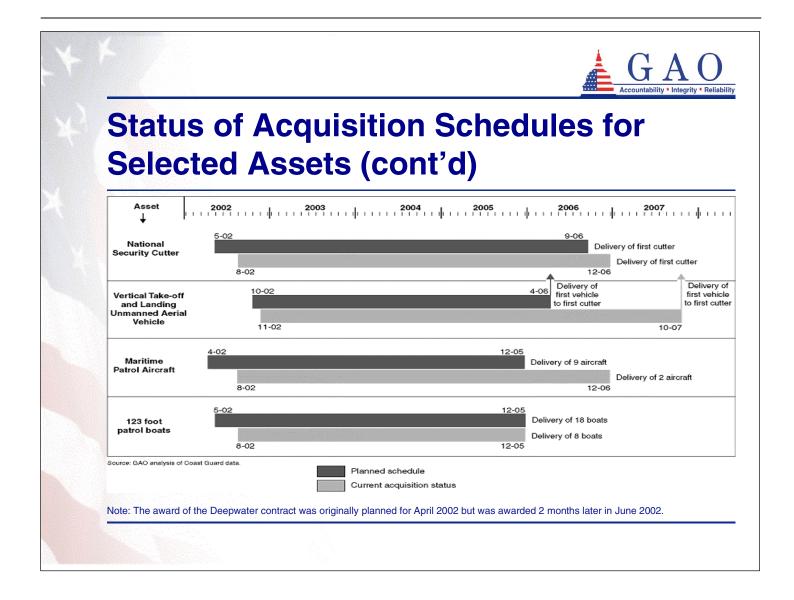




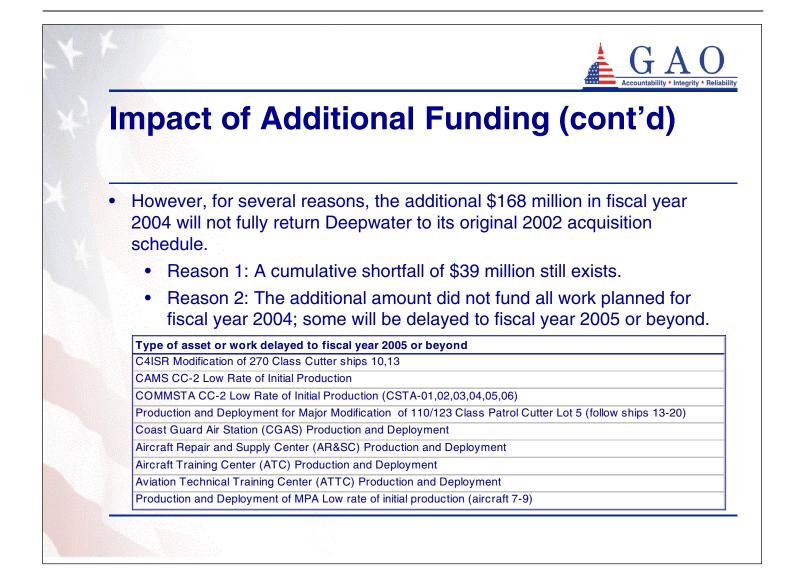


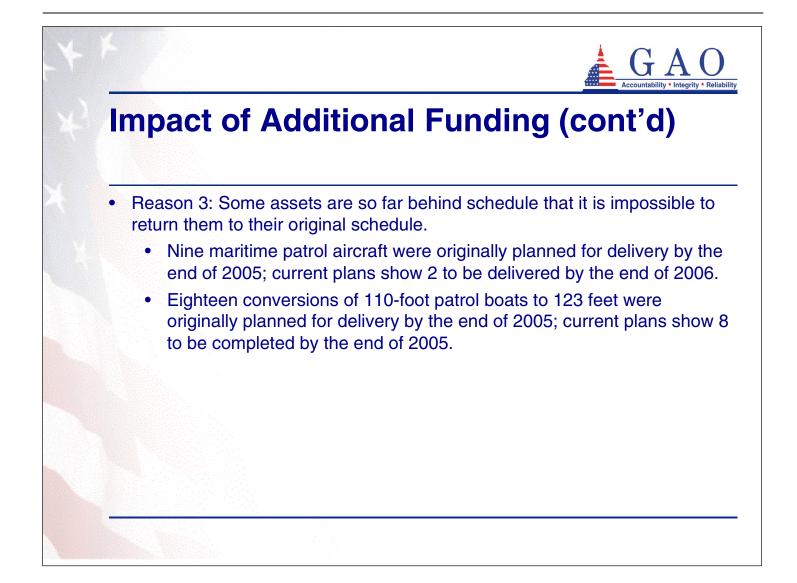


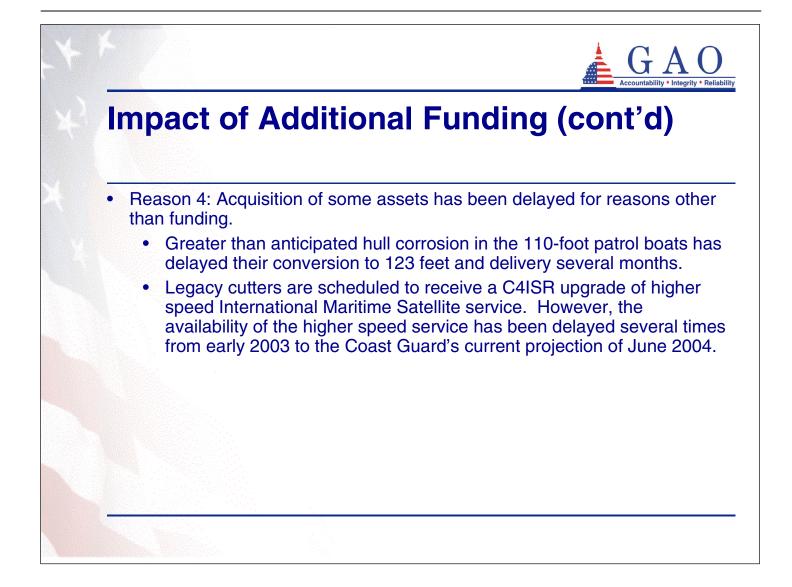


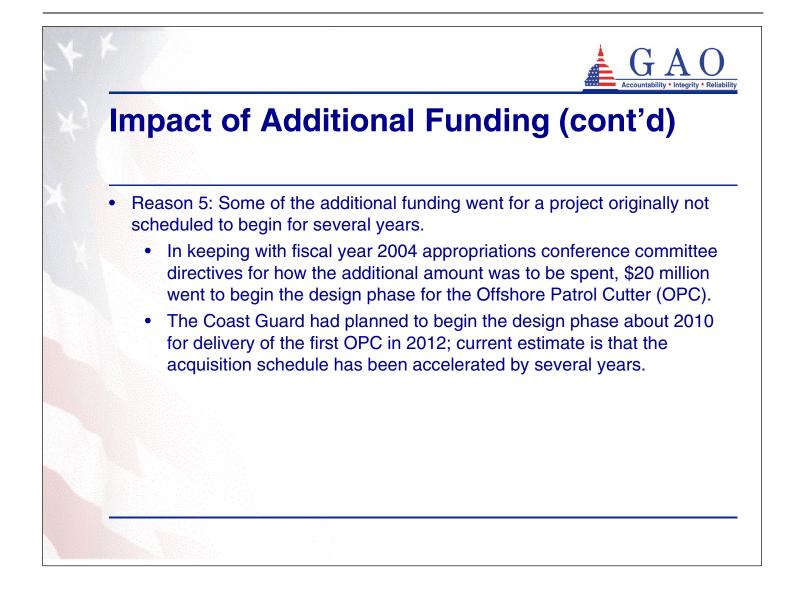


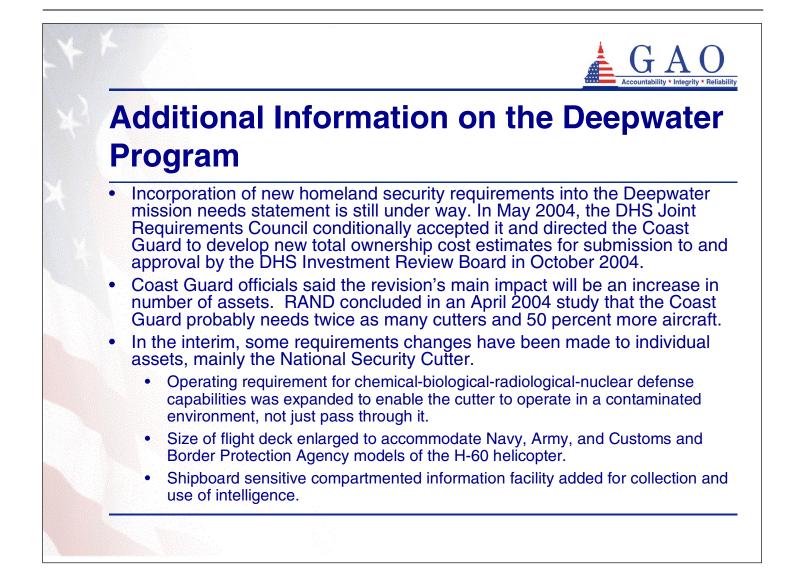
1	mpact of Additional Funding	
•	Part of the additional \$168 million in funding allowed the Co start work delayed from fiscal year 2003 or to start work orig scheduled for fiscal year 2004.	
	Type of asset or work planned to be started	Original fiscal year to start work
	1 MPA w/o missionization and initial spares	200
	Detail Design and Long Lead Material for VUAV	200
	Options on four 110-123 Patrol Boat Upgrades	200
	4 Short Range Prosecutors to be delivered with 123 ft. Patrol Boats	200
	Command & Control System Upgrades on two 210' Cutters	200
	Additional C4ISR shore site upgrades at:	
	Atlantic area	200
	Pacific area	200

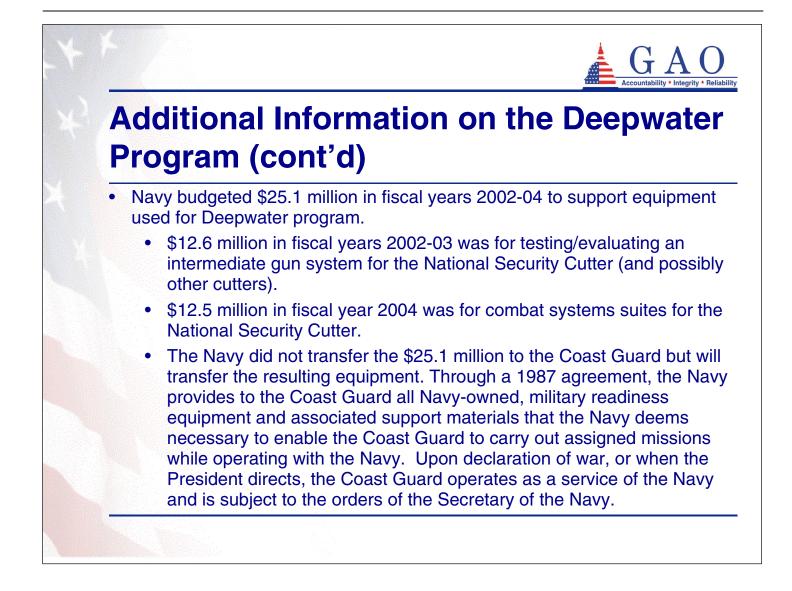


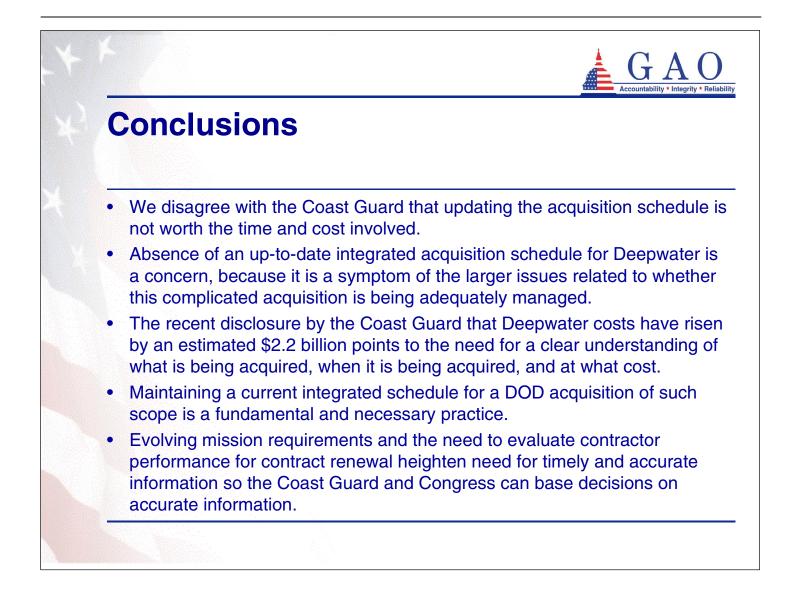








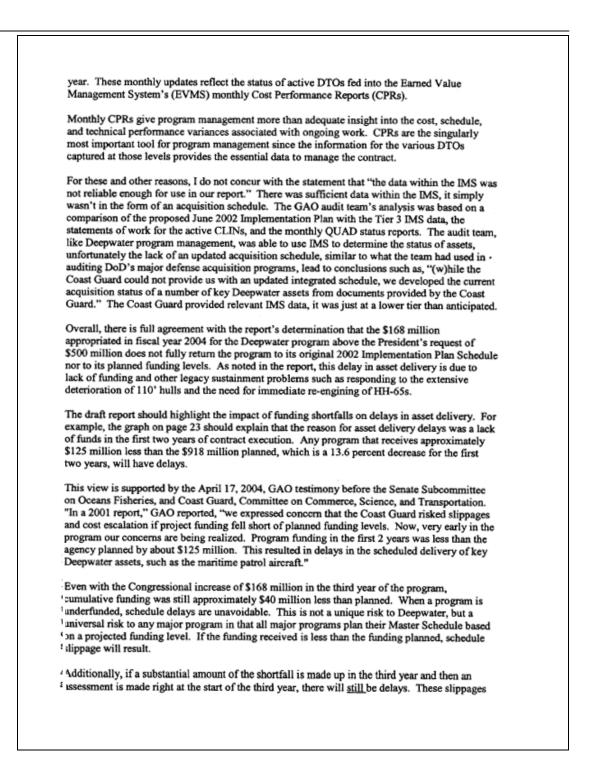






## Appendix II: Coast Guard's Comments

Homeland Security	Commandant United States Coast Guard	2100 Second Street SW Washington, DC 20593 Staff Symbol: CG-8 Phone: 202-267-2405 Fax: 202-267-4850
		3800 27 May 2004
Mr. Steven Calvo J.S. General Accounting Office 141 G Street, NW Washington, DC 20548		
Dear Mr. Calvo,		
This letter is the Coast Guard and D 2004 audit of the Coast Guard entitl Needed." The Coast Guard and the recommendation of the report.	led "Deepwater Program Acquisiti	on Schedule Update
Over the last six months, the Coast questions of the Committee on App concerning the Integrated Deepwate recommendations as an independen respond to the draft report. The Co observations, and I wish to review a	ropriations, Subcommittee on Hon er System. We welcome your obse at review of the program, and I app ast Guard has already provided you	neland Security, ervations and reciate the opportunity to ur staff with detailed
As I noted above, the Coast Guard a recommendation of the draft audit. which we do not concur. First, the acquisition schedule tools currently fact that delays in the delivery sche subsequent need to sustain legacy a	However, there are two specific a draft audit report fails to accuratel i nuse. Second, the draft audit rep dule have been caused by a lack of	reas of discussion with y portray the existing port fails to highlight the f funding and the
The Coast Guard currently uses a m Deepwater acquisition. The top-lev of the acquisition contract is Impler costly, and, as noted in the report, to full update of this Implementation I guidance, the Coast Guard will now	vel plan in the IMS that tracks the is mentation Plan. Development of the he Coast Guard previously planned Plan every contract term. Following	full period of performance his plan is complex and d to do, at a minimum, one ng the draft audit report's
The IMS supplements the Impleme definition and structure to it. The C completely updated in its entirety ( significant improvements have been updated on a monthly basis. Neces and across the air, surface, logistics levels are now being reviewed on a main program areas with the first	Coast Guard acknowledges that the all periods of the three tiers) on a r n made. The near-term periods of ssary horizontal linkages across De s, and C4ISR domains have been v	IMS has not been nonthly basis. But all three tiers are now elivery Task Orders (DTOs) alidated. Tiers 1 and 2 and planners in each of the
major program areas with the mate	complete retriew plantes for all of	



have no relationship to updating the schedule. These delays would exist whether or not the schedule was updated. The updated schedule would have still shown the same delays that the GAO report displayed on page 23. Given the above information, the Coast Guard does not concur with the audit report's conclusion that the absence of an updated integrated schedule is a symptom of the management concerns GAO reported in March 2004. Contrary to the implications of the draft report's language, the Coast Guard is effectively tracking cost, schedule, and performance, and identifying potential risks by maintaining existing management and tracking tools such as the Earned Value Management System (EVMS) and the Monthly Quad Charts. Just as defense acquisitions report quarterly to DoD management, the Coast Guard reports this information quarterly to DHS. As we continue to work together, our agencies will achieve greater mutual understanding of this dynamic and challenging acquisition program. To further that understanding, I also would like to clarify one aspect of the Coast Guard's Deepwater missions and the program's history. While it is accurate to state that the Coast Guard's Deepwater missions generally occur beyond 50 miles from shore, it is important to recognize that these missions, so critical to America's homeland security, start at America's ports, waterways, and coasts and extend seaward to wherever the Coast Guard is required to take appropriate action. Deepwater's more capable, sustainable, interoperable, and flexible platforms and systems will contribute significantly to the Coast Guard's ability to address and defeat maritime security threats closer to our shores and in our ports. These missions are characterized as requiring powerful C4ISR capabilities, extended on-scene presence, any mission using Coast Guard aviation assets, or significant prosecution power. The Coast Guard has incorporated recommendations made by previous reviews of the Deepwater Program by GAO and the Department of Homeland Security. I thank you for your detailed analysis and observations and appreciate the opportunity to share our lessons learned, successes, and growing pains in an open environment as we continue to embrace the tenets of a successful learning organization. I look forward to continued positive dialog with you and your staff as we work to improve the management of the Deepwater program during the coming years. You have our commitment to engage in continuous improvement. BERT S. HOROWITZ Deputy Assistant Commandant For Planning, Resources, and Procurement

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