



**10 Tanker Air Carrier**  
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**October 8, 2015**

**SUBJECT: Written Testimony; U.S. House of Representatives; Committee on Agriculture; Subcommittee on Conservation and Forestry; October 8, 2015**

## **1. BACKGROUND**

### **a. 10 Tanker Air Carrier Brief History**

In 2001, the founders of 10 Tanker Air Carrier (the Company) organized to explore the Government's need to modernize the aerial wildfire fixed wing airtanker fleet. Over the five years that followed, the Company worked with the US Forest Service (USFS) and the other agencies of the National Interagency Fire Center (NIFC) and commercial industry participants to both define and develop a better airtanker tool. Being private investors who had decades of experience in air carrier operations and aircraft modifications, the Company listened to the fire professionals and integrated that knowledge base into what was to become a model of fixed wing "Next Gen" specifications.

Much of the discussions with USFS and others were focused on how to upgrade and improve aircraft known as Large Air Tankers (LATs) that could carry loads of up to 3,000 gallons of fire suppressant. It became clear that load capacity, aircraft performance, safety margins, and delivery consistency were paramount metrics.

Why the DC-10? In exploring the issues with agencies of the NIFC, including the USFS and the Department of Interior (DOI), and others, the Company determined that under basic wildfire suppression concepts the need is for a more effective initial airtanker attack on small fires to preclude expansion into a large wildfire that threatens the nation's public and private lands. Of prime importance, there is a need to preclude large fires in the urban interface where private homes will be destroyed. Most fire agencies believe sufficient resources to gain early control is both effective and cost effective. That means more suppressant, and the sooner the better. The DC-10 fuselage is high enough above the ground to permit external tanks with an 11,600 gallon capacity - 3.5-to-10 times the drop capacity of any other airtanker operating. The tanks deliver any liquid suppressant, including water, if retardant is not readily available or is not desired. With the drop tanks full of suppressant and the fuel tanks filled to permit three hours of airborne operations, the DC-10's superior power-to-weight ratio permits operations at all altitudes and in all terrain. The DC-10's performance assures safer flight operations, while its capacity requires fewer flights, further enhancing safety. Operating from established or temporary tanker bases, the 10 Tanker team can land, reload and get airborne for additional drops within 20 minutes, which coupled with jet speed is sooner to the fire with more suppressant to gain early control of the fire. Finally, once any smaller LAT on contract today or is likely to operate in the future is ordered to "load and return", meaning a second flight by that smaller airtanker, the single flight of the 10 Tanker DC-10 with three-or-more times the capacity is far cheaper, thus less of a burden on the state and federal budgets.

As the underlined words above indicate, the Company developed the DC-10 airtankers to provide a wildfire response that is “More, Sooner, Safer and Cheaper” than any other large airtanker operating today or any that is likely to operate in the foreseeable future. After investing tens-of-millions of dollar of private capital on design, engineering, and aircraft modification, the Company received a Normal Category (not Restricted Category) supplemental type certificate (STC) from the Federal Aviation Administration (FAA) and also earned a FAA operating certificate under 14 CFR Part 137 in 2006. Subsequently, the Company demonstrated acceptable suppressant drop coverage for the USFS Laboratory in 2006. Upon receiving Interagency Air Tanker Board (IAB) approval the DC-10 was deemed by the USFS to be a capable airtanker and was labeled as a Very Large Air Tanker (VLAT).

## **b. 10 Tanker Air Carrier 2015 Operations**

Thus far in the 2015 fire season, 10 Tanker has operated more than 400 missions on 80 or more fires in Western states. It would have required approximately 1,500-to-2,000 missions by other LATs. In 10 fire seasons, 10 Tanker has operated more than 1,700 missions on more than 300 active wildfires. Thus, fire commanders are now well aware of our superior capabilities and are now specifically calling for the DC-10 more often for its significant effectiveness.

## **c. 10 Tanker's Current Fleet**

10 Tanker currently operates three FAA and Forest Service certified DC-10-30 airtankers. In the first Next Generation Airtanker contract (NextGen 1.0) awarded in 2013, 10 Tanker was awarded a long-term “exclusive use” contract for one DC-10 airtanker and was the first of the companies awarded to begin active suppression operations that year. In Sept. 2015, 10 Tanker was awarded a contract for an additional DC-10 under the “NextGen 2.0” contract.

## **2. 10 TANKER AIR CARRIER POSITION ON THE 2015 FIRE SEASON AND LONG TERM TRENDS**

### **a. The 2015 Fire Season**

In 10 Tanker's view, fire seasons are becoming longer, hotter and more dangerous than ever before. As the drought in Western states continues, the deteriorating conditions of the trees and other plants are providing ideal fuels for large wildfires. Thus, the time to respond is growing shorter and shorter before an uncontrolled fire becomes a large or mega wildfire. Fires are now out of control for weeks, not just days. Given even a moderate wind, even a spark on the grass may end up being a large wildfire out of control within just a few hours. That leaves very little time for local residents and government agencies to respond.

As a result of these conditions, through September 25, almost 49,000 wildfires have scorched more than 9 million acres. At this time in a fire season that is not over, the number of fires is the most since 2011. The acreage burned is the most since 2006. More than 2 million acres were burned in August 2015 alone, the third worst destruction for that month in history. As noted above, 10 Tanker has flown more than 400 missions on more than 80 wildfires this season, whereas in a similar period in 2014 we flew only 234 missions on 59 fires. Additionally, as a result of the current continuing spread of wildfires, 10 Tanker and other contracted airtanker operators are being kept on duty through the month of October.

### **b. Current and Future Wildfire Requirements**

Research is always a factor in looking towards the future. However, while there has been significant research in the past 10 years, much of the research that appears valid fails to be vetted with industry and is unlikely to be implemented. The Company is aware that the USFS has an on-going research effort to

determine which aerial firefighting aircraft available now and in the foreseeable future is the most effective. The Company has asked USFS to share its findings with it and others as soon as possible. As numerous studies have seemingly failed to produce useable models, 10 Tanker believes that experience trumps quantification due to the many variables involved in controlling a large fire. Thus, the Company's position is that 1) detection, 2) command and control, and 3) suppression and containment are three distinct elements, each of which deserves the best training and equipment.

On the suppression front the "First Strike" practice of bringing MORE resources SOONER to ALL fires to catch them BEFORE they emerge should be rigorously adopted and enforced. When large fires are burning out of control, fire managers still need to provide tactical support to "point" protection efforts. The quantity of retardant carried by the DC-10, and the quality of the line it produces, makes this a particularly good asset for ALL wildfires and for multiple drops on different corners of the fire on the same mission.

**NOTE: These assets require preemptive funding, not catch-up budgeting.**

10 Tanker agrees that the USFS and agencies of the NIFC need multiple tools. This should include helicopters, single engine air tankers (SEATs), large air tankers (LATs) and proven VLATs. Due to the worsening wildfire forecast, the MORE, SOONER, SAFER, CHEAPER concepts described above are the keys to supporting our ground forces in managing wildfires better in the future.

The puzzle that the federal government partners have been struggling with is how to meet those essential concepts in a manner that is most effective, thus in the greatest public interest. At a meeting in February 2012, the USFS informed industry partners that they intended to contract or acquire approximately 30 next generation airtankers. Of those, the USFS clearly stated their intent to acquire 7-10 newly manufactured aircraft to meet those needs. Subsequently, USFS has awarded two contracts to industry partners for 14 of the next generation air tankers and has issued a Request for Proposals (RFP) for a newly manufactured airtanker.

Concerning the newly manufactured airtanker, in the FY 2015 appropriation, the Forest Service requested funding for a newly manufactured airplane to be used in the aerial firefighting mission. Congress provided that, "of the funds provided, **\$65,000,000** shall be available for the purpose of acquiring aircraft for the next-generation airtanker fleet to enhance firefighting mobility, effectiveness, efficiency, and safety, **and such aircraft shall be suitable for contractor operation** over the terrain and forested-ecosystems characteristic of National Forest System lands, as determined by the Chief of the Forest Service." Thus, the Forest Service issued an RFP for a newly manufactured aircraft that could meet the wildfire suppression capabilities for the future and to also meet a requirement to provide air mobility of cargo and/or passengers. The RFP also specifies a government owned, contractor operated (known as GOCO) concept. The USFS subsequently held an Industry Day meeting on August 26, 2015, to explain the details of the RFP to interested companies; to clarify that the future contract would provide capability to increase the numbers of those new aircraft as evaluations and budgets permit; and they hosted individual company sessions to permit companies to comment.

While 10 Tanker Air Carrier and other attendees do not represent the capability to produce a newly manufactured aircraft, the Company did receive an individual company session. While not objecting to the details of the RFP that would eliminate all others except the Lockheed C-130J, the Company did recommend to the USFS that newly manufactured Government-Owned, Contractor Operated (GOCO) aircraft should only be PART of the mix of future airtanker assets. For example, additional, thoroughly overhauled MORE, SOONER, SAFER, CHEAPER DC-10 airtankers, while not newly manufactured aircraft, could be delivered to USFS in a very efficient manner. More specifically, the costs incurred to acquire six (6) DC-10s modernized to complement the needs of future airtanker operations are

approximately equal to that of two new 130Js. Each DC-10 will bring more than three times the suppressant capability of a C-130J, and each of the 6 DC-10 airtankers can be delivered in six-month intervals. Production and delivery of these DC-10 airtankers can be via the GOCO concept. Thus, the Company believes that the needs of firefighters on the ground would be much better served by adding some highly effective DC-10's to get the PRIMARY MISSION (suppression) better accomplished. In so doing, the cost will be about one-third that of any given number of newly manufactured airtankers, with an effectiveness that is 3.5 times or better.

Of the four criteria stated in the RFP for the aircraft to be acquired - suppression, logistics, personnel transport, and use by other government agencies, the DC 10 would offer payload and range advantages to complement the new aircraft and provide a fleet of significantly greater value to the Government and the public.

Thank you for this opportunity to testify.

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