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Index

1

Killing the AAF MIL Mi 8/17 Helicopter
Zerstörung der AAF MIL Mi 8/17 Hubschrauber

About / Über

TWT

- Trans World Technologies - is a commercial network with contacts and project experience in many countries around the globe. Besides consulting, project development and foreign marketing support TWT is observing, analyzing commenting and advising current economical, technological and political topics & trends.

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Overuse & Maintenance Problems Strain the Afghan Helicopter Fleet. Really?

No! There are no technological, technical or financial reasons to ultimately explain why there are so many problems, incidents and crashes. Politics, misinformation, misconceptions, mismanagement and greed are more likely the actual causes killing the US Government, NATO & RSM sponsored Afghanistan Air Force MIL Mi 8/17 Program and taxpayer's investment



Overuse, maintenance problems strain Afghan army helicopter fleet

KABUL (Reuters) - A deadly mix of hard use and poor maintenance has taken a heavy toll in recent months on Afghanistan's aging fleet of Soviet-era helicopters, one of the mainstays of its air support while U.S. Black Hawk helicopters enter service over coming years.

When being a commercial passenger you will not doubt that the airline of your choice and its management, which you trust, maintains good relations with the manufacturer of the aircraft they fly you in.

You automatically will also expect that concerning all technological and technical issues e.g. maintenance, repair and overhaul your airline will aspire for your safety and satisfaction to ensure 100% full compliance with the manufacturer requirements and recommendations as per the specific aircraft type certificate specifications and service bulletins.

Finally you should prefer that your aircraft is serviced only from

professional, manufacturer approved and licensed maintenance, repair and overhaul service providers overall certified by a competent and integer certification authority.

Anything less quality and professional must worry you and quickly makes you avoid such airline and its aircraft once and for all.

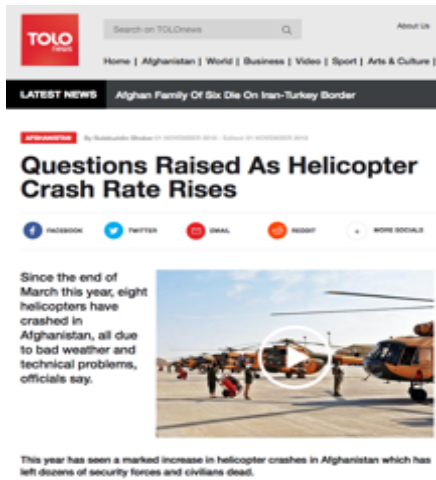
Military aircraft in comparison of course are different in the sense that they are more special and typically meant to operate in more dangerous times and environments. To provide states more leverage in registering and operating military aircraft they as other state aircraft are up to date in principle exempted from ICAO international civil aviation regulations.

Nevertheless at least in western countries it is common understanding and use that the safety standards applicable to military aircraft should not be less than for civil aircraft and airworthiness procedures and responsibilities are analogue to the civil aviation as benchmark.

As a matter of fact in the western world in peace time there is little tolerance for military aircraft design, development, production and operation if type certification and continuing airworthiness actions do not comply with civil aviation safety standards.

So if western countries as i.e. the US, NATO member countries, Australia and others wish to promote and introduce globally their otherwise high standards and improvements, it should seem only just to inquire how it comes that in the case of the US, NATO, Australia

etc. sponsored AAF MIL Mi 8/17 regular and Special Mission Wing (SMW) fleets Program such does not seem to apply and work.

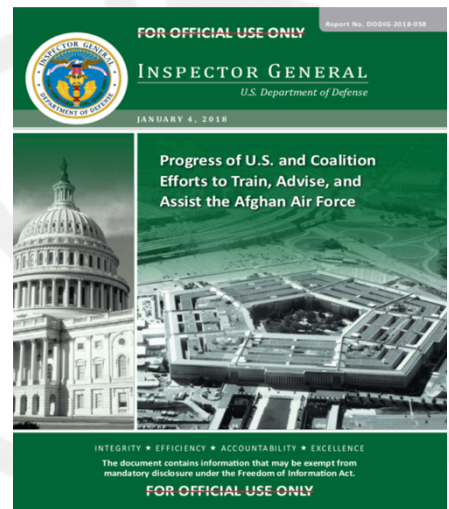


According DoD and SIGAR reports almost 100 MIL M 8/17 type helicopters were originally authorized for AAF Regular and SMW fleets. Close to 80 were 2018 in inventory (although most times SMW aircraft are not reported publicly). I.e. the SIGAR Q2/2018 report documents *“The United States procured 33 Mi-17s from Russia for the AAF with ASFF funds (the others were procured for the Afghans from other sources) and 30 for the Special Mission Wing from 2011–2014... As in previous quarters, the Mi-17 flew the greatest number of sorties (4,706)The Mi-17 continued to fly the most hours of any airframe, an average of 815.5 hours per month this reporting period, ... This was a decrease compared to the Mi-17’s 829...hour average reported last quarter.”*

A 2018 DODIG report clearly labels the AAF MIL Mi 8/17 the “workhorse” of the AAF. Military personnel and civilians, human remains, goods and resupplies are transported, casualties evacuated and combat missions performed. *“Senior coalition officers cited the use of the Mi 17 as a lifeline to resupply forward operating bases in contested areas and as a critical element in preventing Afghan National Army collapse in Helmand and Nangahar provinces in 2016 ...”* and *... they fly in support of six ANA corps throughout Afghanistan...flying aircraft beyond*

their programmed ... flying hours ... AAF Mi 17s ...are vital to the success of the Afghan National Army’s operation throughout Afghanistan.” The same report also finds that *“The Coalition administers Contractor Logistic Support agreements for AAF aircraft...Although it is one of NATO’s goals for the AAF, these contracts do not contain either a plan or a timeline to transition maintenance operations to the Afghans.”*

Alone this last finding is naïve. The so called Contractor Logistics Support misinterprets actual MIL Mi 8/17 Industry realities. Any such work always could be done only with the support of the manufacturer and Russian state authorities approvals. Since years however US, NATO and RSM contractors however have failed to receive such support and approvals which is why today maintenance is compromised if not corrupted with dire consequences.



Especially 2018 has seen an increasing number of AAF MIL Mi 8/17 incidents and accidents with loss of life in Afghanistan. This rightfully raises questions to the causes and in how far there are reasons underlying a certain pattern.

AAF in general and specifically AAF MIL Mi 8/17 fleets are funded, controlled and managed by the US Army with certain additional financial and out-sourcing support from NATO and other RSM

members. US, NATO and RSM institutions with their managers and staff respectively their appointed contractors are responsible for the airworthiness of the AAF MIL Mi 8/17 helicopters and ultimately have to answer legitimate questions pertaining to the incident and accident rate not related to enemy actions.

In general the subject matter is not fully transparent and certain matters are legitimately kept in secrecy by relevant institutions citing the need for security. On the other hand there is also certain empire building and construction of legends for at least questionable purposes as it seems.

To really understand the current crash rate problems one needs to look at the history of US Government MIL Mi 8/17 purchases. In general they started small-scale in the early 90’s more or less for individual aircraft or small sets of aircraft planned for special projects in other countries and therefore were acquired in rather special ways avoiding direct contact and dealings with the MIL Mi 8/17 Industry sales organization and Russian state export control authorities. Instead all kind of third party contractors were involved as intermediaries. This way, until today since almost 30 years, remains core US acquisition policy concerning MIL Mi 8/17 helicopters. From the early years influences and way of doing business exist up-to-date, which in essence incorporate misinformation, misinterpretations and misconceptions about the MIL Mi 8/17 - Industry, the MIL OEM-PAH Supply Chain.

The biggest of all errors is to think that any kind of maintenance could be performed without official manufacturer support. All this negatively affects AAF MIL Mi 8/17 product support and includes all sorts of conflicts concerning type-certificate holder approvals, licensing and state type certification

regulations. No doubt the manufacturer industry has its own contribution in all this but in the end the ultimate responsibility for the AAF MIL Mi 8/17 Program problems lie with its US, NATO and RSM sponsors.



When the US Government eventually decided to purchase different MIL Mi 8/17 type models for the establishment and development of effective Air Mobility capabilities of the Afghan state this decision originally was well received by international experts as being the helicopter type most suited compared to the mission, the climate and topology as well as the infrastructure and human resources in the country.



Since 2005, the United States therefore had procured MIL Mi 8/17s to build the capacity of the Afghan military. As generally accepted helicopters are rather dual-use goods, which, when export and OEM support actions take place, typically require approval from state export control authorities. In Russia the responsible and exclusive export control and approval organization appointed by the federal government to oversee marketing, sales, negotiations, and contract-closing concerning goods (systems, components, parts, services and

licenses) for military end-use is Rosoboronexport. Independent from Russian industry-own marketing campaigns it in the end remains up-to-date the sole state authority legally empowered to review, decide and approve export applications and deliveries of any such above goods from Russian Federation origin.

The US imposed 2006 sanctions on Rosoboronexport, which were lifted again in 2010.

In two August 2010 letters Russia's Federal Service for Military Technical Cooperation, in answer to a US Navy inquiry, FSMTC clearly advised "that any sale of Mi-17 helicopters would be considered military exports, and therefore required the participation of Rosoboronexport." as publicly documented in a GAO decision November 05, 2010.

For different reasons including also to comply with US sanctions various US acquisition efforts concerning MIL Mi 8/17 during the period 2005 – 2011 however since long time involved to circumvent Rosoboronexport. It was mainly done by resorting to old habits involving also i.e. vendors neither with truly proven MIL (MMHP) nor any Rosoboronexport relations, simply trading the helicopters and exporting them on false pretenses avoiding any required coordination with Rosoboronexport and proper Russian formalities. Russian Federation regulatory affairs this way were not only ignored but breached and the foundations for compromising and corrupting the US and NATO sponsored AAF MIL Mi 8/17 Program were laid.

Instead of this way the US Government better should have reached with the Russian Government a compromise including a sanctions rule exception as later introduced by the US Department of State and specifically

concerning the for Russia important and required Rosoboronexport military goods export support for AAF MIL Mi 8/17 sustainment. Although today such exemption actually has been several years in effect it curiously enough is effectively not applied probably due to lobby efforts of US industries.

Many of the early AAF MIL Mi 8/17 procurements, because of ill-managed conflicting US internal political positions, therefore were with civilian specifications without any approvals and warranties for military end-use.

In January 2010, the responsible DoD Undersecretary (and later SEC DEF) Ashton Carter directed the Army to newly stand up a Non-Standard Rotary Wing Aircraft Project Management Office (NSRWA PMO, 2018 renamed into MASPO) responsible for "executing all procurement, containment, and technical support to meet requirements for non-standard aircraft and crews in support of DOD and partner nations."

In January 2011, the Army issued a solicitation for military Mi-17s with plans to award the contract to Rosoboronexport. DoD finally justified the need for Mi-17s from Rosoboronexport based on the public interest exception to the Federal Acquisition Regulation requirement to provide for full and open competition. Several jealous if not greedy U.S. firms filed legitimate bid protests related to the procurement of 21 Mi-17s, but all protests were denied or dismissed.

The eventual May 2011 contract with Rosoboronexport contained options for DoD to purchase an additional 12 military aircraft. DoD exercised these options in 2012. The "contract with Rosoboronexport provided Army officials with extensive access to the original equipment manufacturer's facilities and allowed

for technical discussions on the aircraft's design, testing, and manufacturing processes. This level of insight enabled the Army to determine that the Russians' process was sufficient by U.S. standards to certify airworthiness. (GAO Report to Congress April 01, 2013)

In a statement published in August 2011 the then Deputy Director of the Federal Service for Military-Technical Cooperation of the Russian Federation, Vyacheslav Dzirkaln said regarding the US purchase of Mi 17 type V5 models for AAF: "These are transport military helicopters to be additionally equipped under the USA and the NATO standards... There are different talks with the USA, and the NATO on purchase of helicopters. As a result, talks with the USA ended with signing a contract for purchase of helicopters, and talks with NATO transformed into intention to create the Fund to service Russian Mi helicopters operated by NATO... The thing is that NATO countries widely use Mi helicopters. One and a half year ago, we said at one of sessions that Russia is not happy with the situation, when Mi helicopters are recognized as Russian brand, but, in fact, Russia has no relation to them. We do not know the origin of spare parts, we are not aware of how those helicopters are upgraded, and how maintenance bulletins, including on safety of flights, are observed. Therefore, we said that we are ready to cooperation with Europeans in respect of maintaining serviceability of helicopters operated by NATO... we are at the stage of certification of enterprises for repair of helicopters of the countries of the former Warsaw Treaty - Poland, Slovakia, Czech Republic, and Bulgaria. It is done to confirm their ability to carry out a certain amount of works to be agreed on with and monitored by the developer of Mi helicopters. Therefore, the ideology of this Fund is to provide, first of all, safety of helicopter flights, supply these helicopters with genuine spare parts, and establish contacts with the developer and the manufacturer of these helicopters... That is the Trust Fund, on the one hand, is to deal with counterfeit items, and, on the other hand, support reputation of Mi helicopters. But once again, I underline to prevent any mess

in the press: the Fund will not serve helicopters under the contract concluded with the USA... Under the contract with the Americans, we agreed, among other things, on further support and maintenance of these helicopters by Russia in collaboration with respective organisations in the USA. Not through NATO... The Trust Fund is Europe, the contract is the USA. Let's make such a difference. In no way, these two contracts overlap. We informed Americans that we carry out the work with Europeans. They know about it. We informed that a number of enterprises in East European countries will be certificated to further carry out repair, and upgrading, but with support and through collaboration with Mil. If they want to use it they can do it... But we said that under the project with the USA, a certain structure will be created in Afghanistan, as to carry helicopters from Afghanistan and repair them in Europe is expensive. And the European helicopters are based in Europe, and they fly to Afghanistan only for performance of a mission for a certain time interval... The whole contract consists of 1,070 pages, including a commercial part and technical requirements. Reaching an agreement was not an easy thing."

The Afghan military had approximately 50 Mi- 8/17s as of 2012, when the Army planned to purchase at least 30 additional Mi-17s. In November 2012, the Army issued a request for information to identify potential sources again from third-party industry to purchase despite the long-time common knowledge that Rosoboronexport needs to conclude or at least approve any such export (in 2010 Senior DoD officials had stated that any attempt to procure a civilian aircraft for military end use could be blocked by Rosoboronexport if DoD did not go through them). According GAO, DoD officials had stated that purchasing used Mi-17s on the open market was not a viable option because (beside the end-use / export controls problem) they had experienced safety and maintenance problems impacting cost and schedule with these aircraft in the

past (when coming from unauthorized sources). Over the years all the while US helicopter industries from day one legitimately were jealous and angered that US budgets were spent not with them but with their foreign industry competitors in Russia and Ukraine.



For the US Taxpayer, in comparison to what the US helicopter industry for its products typically charges DoD, the MIL Mi 8/17 procurements always were and until today objectively should remain a good bargain and investment considering for the defined purpose. The unit price paid to Rosoboronexport then was \$17.15 million for the zero hours factory new product reconfirmed by an internal Army analysis as "reasonable". "Additionally, a DOD Independent Review Team, including members from the Defense Contract Audit Agency and Defense Contract Management Agency, reviewed the Army's contract with Rosoboronexport and did not take exception to the Army's conclusion that the negotiated price was fair and reasonable."

The Pentagon announced in June 2013 that "Rosoboronexport had been awarded a \$554 million contract for 30 Mi-17s (\$18.46 million per unit) to be used by the Special Mission Wing." It "said there was an "urgent, near-term need" to buy the wing the Mi-17s, a multimission aircraft designed to operate at high altitudes and uniquely suited for the wing. It was further stated that "Careful consideration of all the information available to the department confirms that it would be in the public interest to procure the Mi-17s needed for the (wing) from Rosoboronexport."

This was “a move that came just days after the House approved a 2014 defense policy bill that included a prohibition on contracts with the Russian agency. The Senate Armed Services Committee included a similar ban in its version of the bill. The defense policy bill for 2013 also barred the Pentagon from using funds from that fiscal year for contracts with Rosoboronexport. But then the Pentagon said money from the 2012 fiscal year was being used for the Mi-17 acquisition, so the restriction would not apply.”

Despite DoD still wanted to order more MIL Mi 8/17 helicopters for AAF regular and SMW fleets the US helicopter industry lobby by the end of 2013 had succeeded in countering and blocking its prime customer to procure anymore MIL Mi 8/17s.

In June 2013 a dedicated SIGAR Report stated “Afghan Special Mission Wing: DOD Moving Forward with \$771.8 Million Purchase of Aircraft that the Afghans Cannot Operate and Maintain”

For the FY 2014 DoD had planned to purchase additional 15 Mi 17’s from Rosoboronexport for reportedly \$345 million (at a unit price of \$23 million) but DoD (despite the urgent operational needs in Afghanistan) effectively gave in to US Congress lawmakers being contra Russia and who in essence argued “Doing business with the supplier of these helicopters has been a morally bankrupt policy.” The Pentagon accordingly appeased these lawmakers by declaring: “After initially requesting funds from Congress in the FY14 (2014 fiscal year) budget to provide additional enhancements for the Afghan National Security Forces, the department has re-evaluated requirements in consultation with Congress. We currently do not have plans to purchase additional Mi17s from Rosoboronexport beyond those in the Afghan Program of Record.”

In October 2014 the Rosoboronexport contracted and approved export deliveries of mainly Mi 17 V5 models to AAF on behalf of DoD were completed totaling 63 units since the restart of procurement via Rosoboronexport in 2011.



By 2016 the industry’s US Congress lobby work and the UH-60 pitch of Sikorsky (now Lockheed) paid off. Agreement was reached to sell DoD 159 units of surplus UH 60 A Blackhawk helicopters manufactured prior 1989 together with a refurbishment for AAF use as an integral part of the Afghanistan Aviation Transition Plan (AATP) drawn up to support US industry interests. “The decision was made following long run efforts by Murphy, U.S. Senator Richard Blumenthal (whose state is home to UH-60 Blackhawk helicopter manufacturer Sikorsky Aircraft), and U.S. Representative Rosa DeLauro. They have been at the forefront of the effort urging the Pentagon to end its reliance on Russian helicopters and to field an American alternative to the Mi-17s in Afghanistan... Millions of American dollars should never have gone to Russia for Mi-17 helicopters instead of Sikorsky Black Hawks — a travesty that will now be stopped,” Blumenthal said”



Whirlybird-Brained: U.S. Making Wrong Chopper Choice for Afghanistan

In how far the UH-60s are a real alternative or replacement for the AAF MIL Mi 8/17s is questionable.

In the end UH 60’s and the Mi 8/17s are actually quite different helicopters in concept, size and performance. They should rather complement than compete with each other except for the given political and commercial reasons. To compare them and to play them against each other is rather counterproductive to Air Mobility in Afghanistan and therefore should be futile.



This relatively detailed look into the AAF MIL Mi 8/17 Program procurement history is necessary as otherwise insight to the roots of the program and its original and underlying problems is hardly possible. Deficiencies, different political interests and conflicts deriving from these procurements continue to have strong negative effects and accordingly influence or actually better to say “hurt” past and ongoing Worldwide Lifecycle Sustainment Support (WLSS) such as e.g. maintenance, repair and overhaul services as well as connected spare parts, components, documentation, licensing and contractor logistics supplies.

Especially with regard to WLSS and despite, or maybe exactly because of, actually ample budgets from US and RSM partner states tax payer ‘s monies the AAF MIL Mi 8/17 Program seems to suffer from being corrupted in the sense of being

inappropriately compromised. The SIGAR Q1/18 Report states “As of November 30, 2017, the United States has appropriated approximately \$5.1 billion to support and develop the AAF from FY 2010–FY 2017, with roughly \$1.4 billion appropriated in FY 2017. Additionally, DOD requested approximately \$1.6 billion for FY 2018, a large portion of which is earmarked for AAF sustainment costs.”

The aircraft although still being relatively new especially compared to military aviation standards are obviously having a quality problem as an ever-increasing number of incidents, crashes and fatalities occur.



As part of a dedicated PR campaign in favor of US products US Government and US Army representatives since a few years like to label the AAF MIL Mi 8/17’s in public relations as “good but old”, as “legacy aircraft”, “helicopters difficult to sustain” and “sunset” ready for retirement, decommissioning and probably scrap like other assets previously invested in. “The UH-60 will enhance the Afghan Air Force helicopter fleet and eventually replace the capabilities currently provided by the Mi-17, which is no longer a sustainable platform. Its implementation is expected to ease the burden on the aging Mi-17 fleet and transition the Afghan Air Force into a modern and sustainable platform for the future. (CENTCOM May 10, 2018)” The same argumentation and/or similar labels subsequently more and more have been entering official US and NATO reporting language “The MI-17, that the UH-60 is going to replace, is not sustainable as a helicopter. So, what we are doing is we’re giving the Afghan Air Force a sustainable, very highly capable and

battle-proven helicopter that they can take forward into the fight as they continue to safeguard their country,” US Major Ted Rogers, Director of Operations 44th Air Expeditionary Advisory Squadron said.”

Truth however is that most of the AAF MIL Mi 8/17’s are of much younger production than the prior 1989 produced UH-60 Blackhawks being delivered now and over the next years to AAF. No criticism here but simply a reminder in order to make clear that it is not the age of an aircraft but its upkeep which first of all counts.

So if and when the increasing number of AAF MIL Mi 8/17 crashes raises questions one thing first to look to is the actual state of airworthiness of any individual aircraft based on it’s sustainment management, applied sustainment actions and the supply chain.

Regarding the (AAF etc.) MIL Mi 8/17 airworthiness and continuing airworthiness “the Army in the early years still took multiple steps to mitigate risks as their engineers were not able to verify the process used by Russia to certify airworthiness of civilian aircraft, in part because stringent U.S. trade sanctions prevented the Army and DOD from directly engaging with relevant Russian (TCH, OEM and PAH) entities prior to 2011. For example, for some aircraft in the Afghan fleet, it imposed costly reductions in the operating time of aircraft components. These reductions were necessary because the Army could not determine their life expectancy. Once the Army gained access to the original equipment manufacturer through the 2011 contract with Rosoboronexport, Army officials reported millions of dollars in cost avoidance by eliminating these reductions ... The 2011 contract with Rosoboronexport provided DOD officials with extensive access to the original equipment manufacturer’s facilities and allowed for technical discussions on the aircraft’s design, testing, and manufacturing Processes (under the auspices of the TCH). DOD officials stated that this level of access was unprecedented... Although

DOD did not obtain the technical data for the 21 Mi-17s, the level of insight that the Army gained into the Russian process for assessing safety and airworthiness enabled the Army to issue a memorandum that determined that the Russians’ process was sufficient by U.S. standards to certify airworthiness.”

Army officials already prior 2013 had stated, that “in the past DOD had operated used Mi-17s, and in maintaining those aircraft, they had identified numerous instances of counterfeit (BOGUS) parts that affected safety and airworthiness.”

Already then “in a recent overhaul of a refurbished, civilian Mi-17, Army engineering officials identified 35 parts that were either not authentic or suspect counterfeit parts” and explained that “due to the prevalence of Mi-17s on the world market, counterfeit or substandard parts have been a long-standing problem with the helicopter.”

As a matter of fact since the 1990’s it never was a secret that with increased global civil and military utilization of MIL Mi 8/17 type helicopters outside the former Warsaw Pact and centered around Russia, there continuously developed an unapproved, dubious worldwide grey and black market business with uncertified, quality non-compliant parts and components from cannibalized scrap aircraft and counterfeit BOGUS production.

Up to date grey and black market activities around the MIL Mi 8/17 type helicopters worldwide remain strong. Although being a criminal offense it is a lucrative business for those involved.

Concerning current WLSS of the AAF MIL Mi 8/17 Program it should be clear that at some point early on and for various reasons the supply chain was corrupted and continues to be compromised up to date despite ample budgets funded by US, NATO and other RSM nation tax-payers.

DoD seems to rely traditionally on (mainly US based) WLSS main contractors suitable to them but with no official accreditation in Russia, neither with MIL (MMHP) nor with Rosoboronexport. Accordingly they have no access to the true MIL (MMHP) OEM-PAH Supply Chain. As a consequence and in order to maximize own profits they work on dumping-price basis with unapproved service providers and suppliers which source in the grey and black markets. It is this way and such methods, which seem mainly to be responsible for continuously infecting the AAF MIL Mi 8/17 helicopters with unapproved parts, components and services.

As this happens since long-time and more or less knowingly to responsible institutions it should not be far fetched to think more questions should be raised in how far US and NATO contractors actually might have and might continue to conspire systematically against US and NATO tax payer as well as national security interests by not delivering good and proper AAF MIL Mi 8/17 Program WLSS while at the same time they still are charging good money and earning good profits from AAF MIL Mi 8/17 Program budgets.



BOGUS parts, BOGUS components and BOGUS services are always introduced with criminal energy for profit reasons and in the end in contempt of human health and life.

Surely not all and everyone working for DoD, NATO and RSM as contractor is individually aware of what happens. Most service

members and civilians involved are with best intentions but somewhere in the US and NATO sponsored AAF MIL Mi 8/17 Program WLSS chain of command and communication there are misconceptions, misinformation and misdoings of such dimension that BOGUS, overutilization and mismanagement are a fact with sad consequences as proven not only by the high AAF MIL Mi 8/17 accident rates but also being criticized for many years now by MIL (MMHP), Rosoboronexport and many others.

Already in 1996 during a high profile US aircraft accident investigation the then Senator William S. Cohen stated as Chairman of the US Congress Subcommittee on Aviation that *“Critical aircraft parts which are bought and sold with improper, forged, or missing documentation represent more than a paperwork problem. Indeed, the entire integrity of the parts distribution system is rooted in the validity and reliability of identifying information that is required ... unapproved parts (are not only) a problem, but they are a present danger to public safety ... It would be irresponsible to ignore evidence of safety problems and fail to act.”*

In 2010 a report by the U.S. Department of Commerce again *“found that it is a best practice to obtain parts directly from an original equipment manufacturer, reducing the potential for procuring counterfeit parts.”*

In a 2013 letter from the then Undersecretary of Defence to GAO, it is written *“... it was a significant matter that the Department of State lifted the sanctions against Rosoboronexport ...The clear and validated statements from the Russian government indicated that there was no alternative source to Rosoboronexport for military end-use aircraft...”*

So how actually can it be, that USG and NATO sponsored AAF MIL Mi 8/17 Program WLSS today still

continues to rely on supplies which are neither approved by the manufacturer MIL (MMHP) OEM-PAH supply chain nor cleared for export via Russia’s state export authority Rosoboronexport?

Politics and profit greed of some certain USG and NATO contractors seem to be the simple truth.

With the US helicopter industry lobby in Congress effectively working against the AAF MIL Mi 8/17 Program DoD and Army came under increased pressure. Congress for long time already had made it clear that its majority did not like DoD to spend budgets with industry in Russia. US firms should be the preferred recipients and in the case of MIL Mi 8/17 WLSS obviously independent of any real expert capabilities.



Due to all this US induced quagmire the long time known, planned and concerning lifecycle sustainment most important WLSS-D (*Mi 171 type scheduled general overhaul after the first 8 years or 2000 total flight hours whichever occurs first*) in 2013 therefore was out-sourced from the Army for contract management to NATO. Obviously the hope had been that NATO with Eastern European NATO Member States would be in a better position to resolve WLSS-D and that involving NATO to front these efforts the critics in US Congress would be silenced.

Accordingly NATO’s Support and Procurement Agency since 2014 awarded several WLSS-D contracts to various former Warsaw-Pact MIL (MRO) service stations in Bulgaria, Czechia and Slovakia despite

information that these service stations were neither TCH nor Rosoboronexport approved to work specifically on the AAF MIL Mi 8/17 Program WLSS.

The political competition between the US and Russia over Syria as well as Ukraine because of US Congress also put Rosoboronexport in September 2015 again back on the US Government sanctions black list. Normally not a real problem as, started by the Obama Administration and holding until today, there is a specific sanction exception: "This measure shall not apply to subcontracts at any tier with ROE and any successor, sub-unit, or subsidiary thereof made on behalf of the United States Government for goods, technology, and services for the maintenance, repair, overhaul, or sustainment of Mi-17 helicopters for the purpose of providing assistance to the security forces of Afghanistan, as well as for the purpose of combating terrorism and violent extremism globally."

US Army and NATO procurement however until today seem to ignore this opportunity and unfortunately the EU sanctions completely ignore this problem up-to-date. They continue all these years despite better information to rely on outsourcing WLSS to contractors not approved by and not working neither with MIL (MMHP), the MIL OEM –PAH Supply Chain nor Rosoboronexport. Coordination of sanction policies between the US and the EU in this regard seems not to exist.

Between 2014 to 2018 this possibly led already to severe infringement of TCH (MIL MMHP) intellectual property rights when the AAF MIL Mi 8/17 Program WLSS-D contractor LOTN in Slovakia claimed that under US Army controlled NATO contract they had successfully undertaken a

worldwide first Mi 17 V5 model general overhaul while such claim actually was contradicted by MIL (MMHP).



One of the first public announcements regarding the Army's former NSRWA Program Management Office after being renamed MASPO (Multi-National Aviation Special Projects Office) and despite of all known WLSS accident and incident problems in August 2018 was, that it "is celebrating its harvest season with the return of multiple Mi-17 helicopters to the Afghanistan Air Force. In the span of one week, MASPO turned over four Mi-17 helicopters picked up from four different facilities across Eastern Europe and Afghanistan. Three of the Mi-17s were transported on a single Antonov An-124 cargo plane over the course of 40 hours moving between three different overhaul facilities in Europe before landing with the consolidated load July 29 in Kabul.

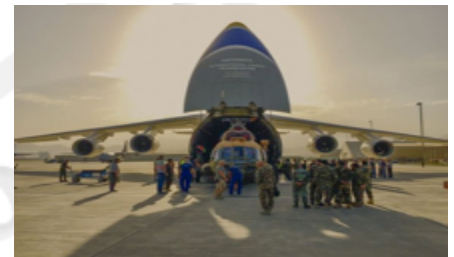
"You are directly supporting the National Defense Strategy with your efforts, through increasing lethality, strengthening alliances and being good stewards of the taxpayers' dollars," Chris O'Donnell, director of the Joint Rapid Acquisition Cell, Office of Undersecretary of Defense (Acquisition and Sustainment), said during a meeting at PEO Aviation headquarters that included MASPO personnel. The overall effort brought together U.S. Army personnel and global teams from each contract facility to complete the deliveries, including Czech Republic's LOM Praha, Bulgaria's Avionams and Slovakia's LOTN. In addition, AAL Group completed the first in-country Mi-17 overhaul at Hamid Karzai International Airport in Kabul with additional use of its facility in the United Arab Emirates. The Mi-17 is a medium lift attack helicopter that performs particularly well in the hot weather and high altitude of Afghanistan. MASPO partnered with the both the NATO Support and Procurement Agency in Luxembourg

and the Army Contracting Command-Redstone to accomplish Mi-17 overhauls and heavy repairs prior to the delivery. "This delivery, out of our NATO partner countries, represents a nearly two year effort to complete a complex overhaul and heavy repair work on the aircraft," Col. John Vannoy, MASPO project manager, said. "The overhaul in Kabul was one of the quickest in MASPO history, completed in just over seven months -- two months ahead of schedule." Both ACC-Redstone and MASPO managed this effort, successfully completing a proof-of-principle to see if a complex overhaul could be completed in Kabul without the airframe leaving the country. "These deliveries return a much needed increase in air power and combat aerial lift capability to the AAF," Josh Kennedy, MASPO's deputy product manager for Mi-17, said. MASPO, NSPA and ACC-Redstone stand ready to enhance partner nation capabilities for the Afghan Air Force's Mi-17 fleet. In May, the MASPO and NATO Support and Procurement Agency teams delivered two Mi-17 aircraft out of overhaul and heavy repair from LOM Praha and Avionams. They continue to work together on contracts at all of the European facilities with eight aircraft still undergoing depot-level work."



Repaired helicopters arrive ahead of schedule

By Program Executive Office for Aviation August 22, 2018



Celebrations despite constant underlying severe conflicts with the aircraft Type Certificate Holder, the OEM-PAH Supply Chain and the OEM state export authorities? Celebrations, despite better knowledge of serious WLSS problems resulting effectively in incidents and accidents with losses not only in material but also of lifes?

The problem, as with all other US Government and NATO sponsored AAF MIL Mi 8/17 Program WLSS actions, again is that the work has been performed without TCH and MIL OEM-PAH Supply Chain support and no Rosoboronexport approvals meaning that parts, components, documents used and services performed should be illegal and BOGUS could not be excluded.



“Official comment of Russian Helicopters Holding Company 10.09.2018 / Press and Information Office of JSC “Russian Helicopters”

Due to the received information on the unauthorized overhaul of one Mi-17V-5 helicopter of the Defense Ministry of Afghanistan by the Slovak Aircraft repair company LOTN, JSC “Russian Helicopters” in the name of the designer (JSC “Mil Moscow Helicopter Plant”) and the manufacturer (PJSC “Kazan Helicopters”) disclaims all liability for the further safe operation of this rotorcraft and has good reason to refuse to provide service support for this helicopter’s operation.

Overhaul of the said Mi-17V-5 helicopter was performed at the Slovak repair facility which had not mastered the overhaul of this type of rotorcraft in due order. Moreover, the overhaul was carried out under the repair/overhaul documentation developed by LOTN without the participation and supervision of the designer and manufacturer. Updated overhaul and design documentation for the military-transport Mi-17V-5 helicopter, spare parts and group kits for overhaul were never supplied to the aircraft repair company in question. JSC “Russian Helicopters” shall notify all Russian and international agencies and entities

concerned on the enrollment of the Slovak Aircraft repair company LOTN on the list of aircraft repair facilities performing unauthorized overhaul of military-transport rotorcraft of Mi-17V-5 type.

It is legitimate to profit in business. But then there should be also good performance and results from actions taken. In the case of the USG / NATO sponsored AAF MIL Mi 8/17 Program, meant to ensure core helicopter air mobility in Afghanistan, this principle obviously does not really apply.

In consideration of all this there seem to be several answers to the question why WLSS does not work and why the AAF MIL Mi 8/17 crash rate is so high.

As technology is not at fault and budgets are filled with ample money from different taxpayers the technical failures must be due to bad maintenance (WLSS) which is a direct function of the AAF MIL Mi 8/17 Program managed by the Army and controlled by the US Government.



Whatever the motives and reasons might be the AAF MIL Mi 8/17 crash rate by all means is unacceptable and prone to rise if there is not a change in thinking with US policymakers and responsible executives.

Overuse of the helicopters in this situation does not help a bit. Since

years AAF MIL Mi 8/17 aircrafts are overused and manufacturer service requirements ignored. Especially time between overhaul for the helicopters as well as parts and components are extended by USG / NATO / RSM and AAF maintainers compared to their certified service life. This together with BOGUS parts and BOGUS services as well as problems in the US Army / NSPA AAF MIL Mi 8/17 Depot Level Heavy Repair & Overhaul only contributes that the AAF MIL Mi 8/17 Program is effectively killed at a time when it is actually much needed.

Public access Army Contracting Command related documents have stated *“... urgent turn-around time requirements for (AAF MIL Mi 8/17) overhaul and depot heavy repair ... with the aim to increase combat power to Afghanistan as rapidly as possible ...”*

One wonders how this is supposed to be possible when there is a lack of conflict resolution with important stakeholders i.e. from Russia the aircraft manufacturer and TCH MIL (MMHP).

The USG repeatedly has stated i.e. via Army Contracting Command Redstone, that it is desired that contractors / vendors should i.e. *“... possess and maintain certification from Mil Moscow Helicopter Plant (MMHP) and the Interstate Aviation Committee (IAC) for civil and military variant aircraft, documented intergovernmental agreement with the Russian Federal Service for Technical Military Cooperation (FSTMC), documentation the company is approved to provide overhaul/repair/modification of Mi-17-1V, Mi-8MTV-1, Mi-171 and /or Mi-17-V5 as well as the capability to enter into contracts with foreign military customers for military purpose overhaul and repair. There should be existing contractual relationships with Rosoboronexport, or documentation from FSTMC indicating a contract with the United States Government (USG) or the Government of the Islamic Republic of Afghanistan (GIROA) in support of*

Afghanistan aircraft would allow for continued utilization of other existing Original Equipment Manufacturer reach back capability for spare parts, services, manuals, and engineering support ...”

Obviously in the end little and definitely not enough has been done in this direction, which is why WLSS actions are not of the quality they must be. In the end they are not effective and fail the maintenance purpose. This together with the USG / NATO / RSM management decision to extent TBOs without neither manufacturer consultation nor manufacturer approval because of operational reasons has led to the well documented overuse and technical decay of many of the AAF MIL Mi 8/17 regular and SMW helicopters. Technical failures this way could not be unexpected and are the main causes for the many incidents and accidents. The responsibilities for these technical issues however do not lie with technology and technics but in truth are direct consequences of in this case bad USG / NATO / RSM - WLSS policies and management.



Overall it might be true that AAF WLSS responsible Redstone ultimately delivers aviation maintenance capabilities to Afghanistan. Concerning MIL Mi 8/17s with AAF military end-use however this delivery definitely since years is faulty. The principle policy misunderstandings and misconceptions about the USG being able to circumvent the MIL (MMHP) Mi 8/17 Industry again once more showed also in this US

Army statement: “On 29 Nov 2017, Army Contracting Command-Redstone awarded a contract for one Mi-17 overhaul in Kabul, Afghanistan. This award serves as a proof of principle to overhaul Russian Aircraft in Kabul to determine feasibility of future Mi-17 aviation overhauls at that location. Division Chief and Contracting Officer for this action, Doug Cooper said, “This contract is a result of the NSRWA Program Office, ACC-R International Contract Office, and AAL Group Ltd working together, each with their own perspective, with the end result being a contract everyone is satisfied with and meets the needs of the warfighter”. The contract award supports the Non-Standard Rotary Wing Aircraft Project Management Office requirement to provide Mi-8 & Mi-17 civilian/military variant aircraft overhauls and repairs to support the Afghan Air Force (AAF) and the Afghan Special Mission Wing (SMW) missions. Colonel Calvin Lane, Program Manager for NSRW office said, “This is an important contract award as we continue to deliver capabilities to the field, ensuring that our combatant commanders remain ready and postured for success.”

A proof of principle? Exactly the opposite is the case as the many WLSS related 2018 incidents and accidents show. Involving in such serious issue as WLSS without TC holder and manufacturer support as well as accepting dealings without required state export approvals is in line with international aviation safety standards rather proof of principle that such thinking and actions are irresponsible with incidents and accidents almost sure to happen as consequence. Instead of celebrating inappropriate actions responsible USG, NATO and RSM officials should rather look for better alternatives to heal past, current and future AAF MIL Mi 8/17 Program problems.

Priority ONE (1) should be to for USG / NATO to modify the current AAF MIL Mi 8/17 WLSS-D program path with its clear problems and to involve better outside support as offered since long time both from MIL (MMHP) and Rosoboronexport

in Russia and concerning engines MOTORSICH in Ukraine. Priority TWO (2) should be to resolve the matter of AAF Mi 17 V5 WLSS-D MIL (MMHP) Approval and IAC Certification. Priority THREE (3) should be to organize effective access to the MIL OEM / PAH Supply Chain with warranties against Suspected Unapproved Parts (SUPs) and BOGUS parts from grey and black marketeers which so far have found and still find their way into the AAF MIL Mi 8/17 program.

Already long time there exist relevant MIL (MMHP) and Rosoboronexport for Russian export authorized proposals to USG / NATO and RSM which would allow via neutral elements to resolve / heal the existing AAF MIL Mi 8/17 WLSS (especially also WLSS-D Heavy Repair and Overhaul) stalemate / problems / confrontation. So far USG, NATO and RSM officials however are ignoring and blocking any such new approach.



Even on the contrary in April 2018 Army Contracting Command’s Dr. Patrick O’Farrell publicly reported that “ACC-Redstone has awarded a \$25.5B ceiling acquisition suite of multiple-award indefinite-delivery, indefinite-quantity (MA ID/IQ) contracts for services in two pools (Large Business & Small Business), with up to a 10-year ordering period (5-year base and one 5-year option) ... The WLSS-C contract enables ACC-Redstone to minimize procurement costs, reduce execution schedules, shortening the time from request for proposal to award to better support a dynamic wartime environment, increase contractor performance associated with supporting the Non-Standard Rotary Wing’s Program Office and their

continued requirements for contracted logistics support and maintenance services... Utilizing the Multiple Award Indefinite Delivery -- Indefinite Quantity procurement approach reduces overall procurement costs through competitive Task Order awards, reducing administration costs associated with supporting additional full scale competitions, and reduces execution schedules by establishing realistic terms and conditions... Early competition of Task Orders will be to provide ... Mi-17 Aircraft contracted support services to Afghanistan” All this obviously was decided again in full awareness that the chosen US Army contractors neither have any required access and know how to work with MIL (MMHP) and Rosoboronexport nor the necessary formal accreditation agreements with them for effective WLSS support from these entities.

Why taxpayer money nevertheless is spent in such irresponsible way in the end remains questionable and hard to explain. Surely the dealings and decision-making around the AAF MIL Mi 8/17 Program sometimes should be investigated more closely, much better and with more determination to discover the truth of the issues then until now.

On thing is for sure: The core facts of the problem are no secret at all. *“The helicopters have crashed due to mechanical fault and due to lack of workshop. The workshops are equipped with US technology while they are repairing Russian helicopters,”* said Hashim Alokzay, head of the defense commission of the...the Upper House of Parliament” in Afghanistan. The wrong procurement policies as simple truth behind the facts however are being ignored and kept well under control. Facts regularly also are being twisted (intentionally or unintentionally because of wrong information does not matter) by many responsible AAF MIL Mi 8/17 Program officials as required. The Russian Administration, though being slow in this case, in 2018 has

started own investigation into possible illegal actions of AAF MIL Mi 8/17 Program contractors and vendors registered in Russia, the Netherlands, UAE, USA etc.. In Russia and else where such actions would not only damage the MIL Mi 8/17 Industry interests but undermine also the Russian state national interest and security itself.



With the recent decision of President Trump to substantially reduce US troop numbers in Afghanistan the importance of the indigenous Air Mobility capabilities of the AAF will most certainly only increase which should be also true even in the event the US outsources the its Afghanistan campaign to a private corporation.

It is more than doubtful that other RSM and other NATO Members shall be willing to bring in more of their very own equipment.

In all this the AAF MIL Mi 8/17 Program independent of the USG AAF UH 60 A Plus Program remains a most important asset and cornerstone of any Afghanistan Security and Development policy also in the future and should not be put at risk and killed off as is being done because of wrong policies, mismanagement and sheer avarice for quick and unjustified profits.

The New York Times

The U.S. Spent \$8 Billion on Afghanistan's Air Force. It's Still Struggling.

By David Zucchino

Jan. 10, 2019



Part of this USG expenditure for AAF should be the AAF MIL Mi 8/17 Program. Technology wise the AAF MIL Mi 8/17 Program helicopters are modern and remain relatively young enough to still have good air mobility potential if, and when properly invested in and maintained.

The USG / NATO / RSM claims, that this to a large extent anyway is already done all the past years and in the future even could be better done in Afghanistan without the typical TCH support of MIL (MMHP) and Rosoboronexport, are rather fantastic and hardly could be true unless new G2G agreements are made or new neutral elements with truly legitimate, professional stakeholders can be found and agreed upon.

RSM for the good development and reconstruction of Afghanistan depend on effective air mobility for which the AAF MIL Mi 8/17 Program with the regular as well as the SMW fleets in past years were, and most likely at least also over the next four years shall be essential.

Since already many years entangled in bad politics, administrative red tape and greed the AAF MIL Mi 8/17 Program today however truly suffers in such way that it actually seems wasted intentionally and that the incidents and accidents / crashes could not really come as a surprise. Especially too many of the much needed AAF Mi 17 type V5 models which were expensively TBO extended - again without TCH approvals - are now grounded and await depot level overhauls. For this USG, NATO and RSM must apply different procurement policies than so far, if they have learned any lessons and if a better Program quality is not only expected, but truly wanted. Otherwise it is just killing the AAF MIL Mi 8/17s with all risks involved. *Dirk P. Schneider*