FOR: SECRETARY OF DEFENSE

FROM: J. Michael Gilmore, Director, Operational Test and Evaluation

SUBJECT: Non-Concurrence with Proposal to Create Separate Cyber Test and Training Range Executive Agents

- I have been requested by the Office of the Under Secretary of Defense for Policy (OUSD (Policy)) to concur on a draft memorandum (Tab A) designating separate Executive Agents for cyber training ranges and cyber test ranges. I do not concur with the draft because it would formally perpetuate an inefficient, bureaucratic-turf-laden status quo that is hindering the Department's ability to respond to the rapidly evolving and increasingly sophisticated cyber threats confronting the Department and the Nation.

- In the proposed draft the Department would create two Executive Agents (EAs) to oversee two distinct and separate lists of cyber ranges composing a small subset of the Department's existing cyber ranges. Creating two EAs would perpetuate and strengthen existing counter-productive inefficiencies in utilization of the Department's scarce cyber range resources, thereby undermining the Department's ability to effectively combine test and training events on the ranges. Combined testing and training are mandatory for the ranges' efficient use, and more importantly, for keeping pace with the increasingly sophisticated and rapidly evolving cyber threats we confront. My office routinely conducts test activities in conjunction with training activities (e.g., live Service or Combatant Command exercises), thereby making the best use of a limited set of cyber resources. The creation of two separate EAs, with separate responsibilities and separate incentives for testing and training, could make it impossible to continue to conduct these combined activities in a timely manner, if at all. It is especially puzzling during a period of severe budget constraints that such a counter-productive proposal is being made.

- Furthermore, in another bow to protecting the status quo and bureaucratic turf, the proposed memorandum does not provide either of the two proposed EAs the authority to control cyber range budgets and personnel. This will eliminate the ability of either EA to effectively manage and control range activities, as well as to efficiently modernize the ranges in a timely manner.

- Finally, the proposal restricts the scope of the cyber range EAs' authority and responsibility to only four ranges, ignoring the other cyber ranges that are funded by the military services and departmental agencies, and also ignoring the many commercial cyber ranges that could be used to augment our current range capabilities.
The Department debated establishing a single EA to manage and fund the Department's cyber ranges during the fiscal year 2013 (FY13) Program Review. Despite five separate 3-Star Programmer reviews, there was bureaucratic turf-related opposition to substantive change and the proposal was not approved. The Senate's report accompanying the FY13 National Defense Authorization Act (NDAA) directed the Department to identify "an entity within the Department that will have oversight of the cyber T&E range infrastructure, funding and personnel," direction the Department ignored. The FY15 NDAA then directed the Department to establish an EA for cyber training ranges and an EA for cyber testing ranges. The FY15 NDAA does not preclude the training EA and the testing EA from being a single entity.

It is time to overcome the bureaucratic, turf-related, status quo and make a substantive change. A fundamental question worth asking is, "Are the Joint Staff and USD(AT&L) the proper organizations to separately staff, fund, and operate cyber-related infrastructure?" As with other Executive Agent cases within the Department, either a single combatant command or a single Service seems a more appropriate, efficient, and logical choice.

I recommend strongly that you direct OUSD(Policy) to re-draft the memorandum at Tab A to designate a single EA for cyber test and training ranges. The single EA should be provided the authority to oversee funding and personnel for all Department-funded cyber ranges, enabling the EA to identify efficiencies and rapidly address critical cyber issues. The EA should also be provided the authority to identify and certify for Departmental use commercial cyber range resources, as appropriate.

Coordination: NONE

Attachment: TAB A

cc: Principal Deputy Assistant Secretary of Defense for Homeland Defense and Global Security

Prepared by: [b](6)