UNCLASSIFIED



Selected Acquisition Report (SAR)

RCS: DD-A&T(Q&A)823-



Presidential and National Voice Conferencing Integrator (PNVC Integrator)

As of FY 2020 President's Budget

Defense Acquisition Management Information Retrieval (DAMIR)

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Sensitivity Originator

No originator information is available at this time.

Common Acronyms and Abbreviations for MDAP Programs

Acq O&M - Acquisition-Related Operations and Maintenance

ACAT - Acquisition Category

ADM - Acquisition Decision Memorandum

APB - Acquisition Program Baseline

APPN - Appropriation

APUC - Average Procurement Unit Cost

\$B - Billions of Dollars

BA - Budget Authority/Budget Activity

Blk - Block

BY - Base Year

CAPE - Cost Assessment and Program Evaluation

CARD - Cost Analysis Requirements Description

CDD - Capability Development Document

CLIN - Contract Line Item Number

CPD - Capability Production Document

CY - Calendar Year

DAB - Defense Acquisition Board

DAE - Defense Acquisition Executive

DAMIR - Defense Acquisition Management Information Retrieval

DoD - Department of Defense

DSN - Defense Switched Network

EMD - Engineering and Manufacturing Development

EVM - Earned Value Management

FOC - Full Operational Capability

FMS - Foreign Military Sales

FRP - Full Rate Production

FY - Fiscal Year

FYDP - Future Years Defense Program

ICE - Independent Cost Estimate

IOC - Initial Operational Capability

Inc - Increment

JROC - Joint Requirements Oversight Council

\$K - Thousands of Dollars

KPP - Key Performance Parameter

LRIP - Low Rate Initial Production

\$M - Millions of Dollars

MDA - Milestone Decision Authority

MDAP - Major Defense Acquisition Program

MILCON - Military Construction

N/A - Not Applicable

O&M - Operations and Maintenance

ORD - Operational Requirements Document

OSD - Office of the Secretary of Defense

O&S - Operating and Support

PAUC - Program Acquisition Unit Cost

PB - President's Budget

PE - Program Element

PEO - Program Executive Officer

PM - Program Manager

POE - Program Office Estimate

RDT&E - Research, Development, Test, and Evaluation

SAR - Selected Acquisition Report

SCP - Service Cost Position

TBD - To Be Determined

TY - Then Year

UCR - Unit Cost Reporting

U.S. - United States

USD(AT&L) - Under Secretary of Defense (Acquisition, Technology and Logistics)

USD(A&S) - Under Secretary of Defense (Acquisition and Sustainment)

Program Information

Program Name

Presidential and National Voice Conferencing Integrator (PNVC Integrator)

DoD Component

Air Force

Joint Participants

US Navy (E-6 TACAMO aircraft); US Navy (Ground Terminals); US Army (Ground Terminals)

Responsible Office

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References

SAR Baseline (Planning Estimate)

FY 2020 President's Budget

Mission and Description

The Presidential and National Voice Conferencing (PNVC) system is the Advanced Extremely High Frequency satellite communications voice conferencing system that will be used by the President of the United States, Secretary of Defense, Chairman of the Joint Chiefs of Staff, Combatant Commanders, and other senior leaders for worldwide, secure, survivable voice conferencing. This capability supersedes and improves upon the existing Military Strategic and Tactical Relay Satellite Survivable Emergency Conferencing Network system. The PNVC capability will incorporate improved voice quality, reduced latency, high availability, increased number of subscribers, and a new conference management capability for the user community.

The PNVC capability exists to meet the communications, voice conferencing, and situational awareness directives for the Nuclear Command, Control and Communications System as described in Presidential Policy Directive 35: United States Nuclear Weapons Command and Control, Safety, and Security. The PNVC system supports the execution of conferences defined in Emergency Action Procedures of the Chairman, Joint Chiefs of Staff 6811.01C.

The PNVC Integrator Program activities include program management, system engineering, development, integration, installation, testing, and sustainment of new baseband (audio-summing, cryptographic, and voice encoder/decoder) equipment. The PNVC Integrator Program completed its risk reduction activities in CY 2016 and developed a PNVC system specification in CY 2017. After a Materiel Development Decision in January 2016, the program office initiated contractor efforts that include testing and site surveys leading to Government integration, validation and verification testing and sustainment activities.

Executive Summary

This is the initial SAR submission for the PNVC Integrator Program as required by FY 2018 National Defense Authorization Act (NDAA), Section 1661, signed December 12, 2017. On May 15, 2015, the Deputy Secretary of Defense assigned the PNVC Integrator Program to the US Air Force with the end-to-end synchronization and verification responsibility. The Air Force Program Executive Officer for Space (AFPEO SP) was designated as the MDA. The Materiel Development Decision (MDD) designated the PNVC Integrator Program as post-Milestone A and an ADM was issued on January 21, 2016 by Lieutenant General Samuel A. Greaves, AFPEO SP. The Program Manager and Senior Materiel Lead was assigned to Air Force Life Cycle Management Center (AFLCMC), Family of Advanced Beyond Line-of-Sight Terminals (FAB-T) Division. The FY 2018 NDAA directed the transfer of funds for PNVC components to the PNVC Integrator Program and the resulting program funding then exceeded the threshold for an ACAT II program. Effective December 1, 2018, the MDA was redesignated to the AFPEO for Nuclear Command, Control and Communications (NC3).

PNVC Integrator Program Objectives

The PNVC Integrator Program Office, as the system integrator, has established the following programmatic and operational objectives:

- Synchronize technical baselines, development, production, and fielding schedules of components being executed by the Air Force, Army, National Security Agency, and Defense Information Systems Agency.
 - Verify end-to-end system requirements across all types of operational nodes.
- Complete Multi-Service Operational Test & Evaluation (MOT&E), followed by an Operational Assessment and declaration of IOC, at which time SSVC capability will transition from SECN and SECN-Digitization to PNVC.
- Operational transition to PNVC supports the overarching NC3, Low Data Rate to eXtended Data Rate Network Transition led by United States Strategic Command.
 - Achieve FOC when all required terminals and nodes have been successfully installed, integrated, and checked out.

PNVC Integrator Program Phases / Stages

The PNVC Integrator Program consists of a Validation effort followed by a Verification effort. The PNVC Integrator Program effort is being executed in phases as follows:

Phase 1 is focused on FAB-T ground fixed, FAB-T ground transportable, and Very Important Person Special Airlift Mission Protected Satellite Communication (VPS) nodes and consists of four stages. The four stages are listed below:

- Stage 1 will be the Contractor's integration and verification testing at the Contractor's site(s).
- Stage 2 will be Site Integration and Checkout conducted by the Contractor at multiple Government facilities.
- Stage 3 will be Dry-Run Developmental Testing (DT) by the Lead Developmental Test & Evaluation Organization (LDTO), Air Force Operational Test and Evaluation Center (AFOTEC).
 - Stage 4 will be Government DT by the LDTO

Phase 2 consists of the same four stages, but adds the E-4B airborne, E-6B airborne, and Secure Mobile Anti-Jam Reliable Tactical Terminal nodes to the FAB-T ground fixed, FAB-T ground transportable, and VPS nodes. AFOTEC will conduct the MOT&E after the successful completion of all four stages of Phase 2 integration and test.

The PNVC Integrator Program includes no software development...

Approval of Major Milestone Decisions - The PNVC Integrator Program was approved as an ACAT III Post-Milestone A program on January 21, 2016 and was designated as a ACAT II program due to the FY 2018 NDAA-directed transfer of

PNVC Integrator December 2018 SAR

funds.

The PNVC Integrator Program is pursuing tailoring of Department of Defense Instruction 5000.02 acquisition approach to combine Milestones B and C for a Post-Milestone C decision.

Award of Major Contracts or Contract Modifications - Awarded Delivery Orders (DOs) that included actions for the Validation and Verification of the PNVC system under the sole source Indefinite Delivery Indefinite Quantity Command and Control Switching System Depot Logistics Contract at AFLCMC, Airborne Communications Division, at Hill Air Force Base, Utah:

- DO1 Risk Reduction and Analysis; September 2016 through August 2017
- DO1.5 System Requirements Validation (SRV) System Specification developed; September 2017 through February 2018
 - DO2 SRV; Technical Baseline delivery; Technical Orders/Training development; March 2018 through June 2019

Pending the Justification and Approval and PEO approval and procurement actions, a new PNVC integration contract will be awarded that includes all the remaining testing, integration and transition to sustainment of the PNVC System.

Testing Status - Phase 1, Stage 1 contractor testing began in October 2018 for the first 3 operational node types. These tests will include characterizing voice quality of the system and assessing performance impacts in a scintillated environment.

Significant Cost, Schedule or Technical Issues Impacting the Program - No significant issues - The PNVC Integrator Program PB 2020 funding is satisfactory. The PNVC Integrator schedule is unchanged from the most recent PEO approved schedule in February 2018. Early integration activity is proceeding nominally, and identified requirements gaps are under evaluation for disposition.

Software Issues - There are no significant software-related issues with this program at this time.

Threshold Breaches

APB Breach	ies	
Schedule		
Performanc	e	
Cost	RDT&E	
	Procurement	
	MILCON	
	Acq O&M	
O&S Cost	120	
Unit Cost	PAUC	
	APUC	
Nunn-McCu	rdy Breaches	
Current UC	R Baseline	
	PAUC	None
	APUC	None
Original UC	R Baseline	
	PAUC	None
	APUC	None

Unit Cost Reporting (Nunn McCurdy) is not required for Pre-Milestone B programs in accordance with section 2433, title 10, United States Code.

Schedule



Schedul	e Events			
Events	SAR Baseline Planning Estimate	C	urrent APB tive/Threshold	Current Estimate
PNVC Integrator Materiel Development Decision (MDD)	Jan 2016	N/A	N/A	Jan 2016

Change Explanations

None

Notes

 MDD Approved by Lieutenant General Samuel A. Greaves, Air Force Program Executive Officer for Space, January 21, 2016

Acronyms and Abbreviations

MDD - Materiel Development Decision

Performance

		Performance Character	istics	
SAR Baseline Planning Estimate	Ob	Current APB jective/Threshold	Demonstrated Performance	Current Estimate
System Test Results				
TBD	N/A	N/A		TBD

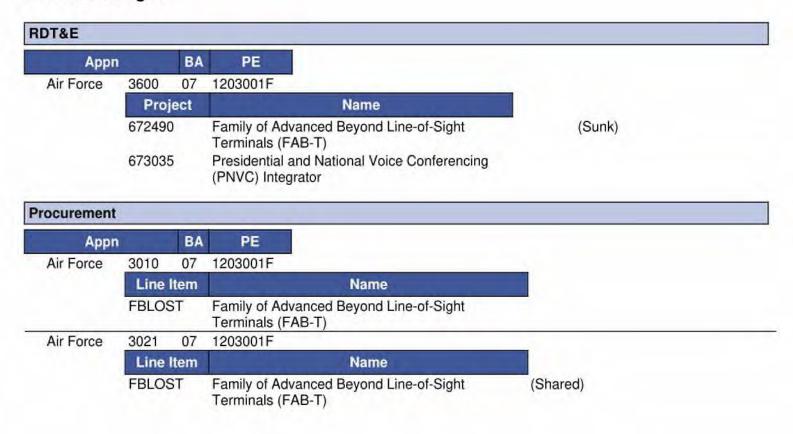
Change Explanations

None

Notes

PNVC Integrator program is a test and integration program and has no key performance parameters.

Track to Budget



Cost and Funding

Cost Summary

		Tota	al Acquis	ition Cost				
		BY \$M		BY 2018 \$M	TY \$M			
Appropriation	SAR Baseline Planning Estimate	Current A Objective/Thr		Current Estimate	SAR Baseline Planning Estimate	Current APB Objective	Current Estimate	
RDT&E	316.7	(46)		313.0	332.5		328.7	
Procurement	19.0			19.0	20.9		20.9	
Flyaway				19.0			20.9	
Recurring	.44	***	24	0.0		V/ co	0.0	
Non Recurring				19.0	**		20.9	
Support		**	44	0.0	-		0.0	
Other Support				0.0		:	0.0	
Initial Spares		- 44		0.0			0.0	
MILCON	0.0	044		0.0	0.0	144	0.0	
Acq O&M	0.0	22	- 22	0.0	0.0	122	0.0	
Total	335.7	-		332.0	353.4	e Re	349.6	

Cost Notes

If an Independent Cost Estimate, Component Cost Estimate, or Program Office Estimate has been completed for the program in the previous year, list any program risks identified in the estimates, the potential impacts of the risks on program cost, and approaches to mitigate the risks.

A Program Office Estimate was completed in CY 2018 and the Single Best Estimate (SBE) was subsequently approved for the development and production portions of this program. The SBE includes funding for mitigation of potential PNVC Integrator Program risks to integration, test, and installation at the 50 percent confidence level.

Total Quantity									
Quantity	SAR Baseline Planning Estimate	Current APB	Current Estimate						
RDT&E	0	0	0						
Procurement	0	0	0						
Total	0	0	0						

Cost and Funding

Funding Summary

			Арр	ropriation S	ummary							
	FY 2020 President's Budget / December 2018 SAR (TY\$ M)											
Appropriation	Prior	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	To Complete	Total			
RDT&E	93.3	32.7	65.9	62.2	43.5	27.9	3.2	0.0	328.7			
Procurement	4.7	0.0	1.9	5.2	5.9	1.6	1.6	0.0	20.9			
MILCON	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
Acq O&M	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
PB 2020 Total	98.0	32.7	67.8	67.4	49.4	29.5	4.8	0.0	349.6			
	**							-	4-			

			Qu	antity Su	mmary					
	FY 20	20 Presid	dent's Bu	idget / De	ecember	2018 SA	R (TY\$ M)		
Quantity Undistributed Prior FY FY FY FY FY FY TO 2019 2020 2021 2022 2023 2024 Complete								To Complete	Total	
Development	0	0	0	0	0	0	0	0	0	0
Production	0	0	0	0	0	0	0	0	0	0
PB 2020 Total	0	0	0	0	0	0	0	0	0	0
	4-		44	- 4		**			- 4	

Cost and Funding

Annual Funding By Appropriation

	360	0 RDT&E Rese	Annual Fu arch, Developme		luation, Air Fo	orce				
		TY \$M								
Fiscal Year	Quantity	End Item Recurring Flyaway	Non End Item Recurring Flyaway	Non Recurring Flyaway	Total Flyaway	Total Support	Total Program			
2015	-	+		-			3.1			
2016							20.4			
2017							51.2			
2018	42				-		18.6			
2019				1.77			32.7			
2020	(+-)				44		65.9			
2021							62.2			
2022							43.5			
2023			(4)				27.9			
2024			-	177	77		3.2			
Subtotal					-	44	328.7			

Annual Funding 3600 | RDT&E | Research, Development, Test, and Evaluation, Air Force BY 2018 \$M Non End **Fiscal End Item** Non Quantity Item Total Total Total Year Recurring Recurring Recurring Flyaway Support Program Flyaway Flyaway Flyaway 2015 3.2 2016 20.9 2017 51.5 2018 18.3 2019 31.6 2020 62.4 57.8 2021 2022 39.6 2023 24.9 2024 2.8

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313.0

Subtotal

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		3010 Proc	Annual Fu curement Aircraf	unding it Procurement, A	ir Force			
TY \$M								
Fiscal Year	Quantity	End Item Recurring Flyaway	Non End Item Recurring Flyaway	Non Recurring Flyaway	Total Flyaway	Total Support	Total Program	
2018		**	44	2.5	2.5	pe.	2.5	
Subtotal		-		2.5	2.5		2.5	

		3010 Proc	Annual Fu curement Aircraf	unding t Procurement, A	ir Force			
BY 2018 \$M								
Fiscal Year	Quantity	End Item Recurring Flyaway Non End Non Recurring Flyaway Non Flyaway Non Flyaway Non Flyaway Flyaway Flyaway Non Flyaway Flyaway Flyaway Flyaway Flyaway						
2018		**		2.4	2.4		2.4	
Subtotal		-		2.4	2.4	- 2	2.4	

		3021 Pro	Annual Fu curement Space		r Force		
				TY \$M			
Fiscal Year	Quantity	End Item Recurring Flyaway	Non End Item Recurring Flyaway	Non Recurring Flyaway	Total Flyaway	Total Support	Total Program
2018				2.2	2.2	**	2.2
2019							-
2020			-	1.9	1.9		1.9
2021	**		-	5.2	5.2		5.2
2022				5.9	5.9		5.9
2023				1.6	1.6	**	1.6
2024				1.6	1.6		1.6
Subtotal		44	144	18.4	18.4		18.4

Annual Funding 3021 Procurement Space Procurement, Air Force								
		BY 2018 \$M						
Fiscal Year	Quantity	End Item Recurring Flyaway	Non End Item Recurring Flyaway	Non Recurring Flyaway	Total Flyaway	Total Support	Total Program	
2018				2.1	2.1	re.	2.	
2019				**			-	
2020	**	**	199	1.8	1.8		1.8	
2021				4.7	4.7		4.7	
2022				5.2	5.2		5.2	
2023	-		**	1.4	1.4	**	1.4	
2024				1.4	1.4		1.4	
Subtotal		44	**	16.6	16.6		16.6	

Low Rate Initial Production

There is no LRIP for this program.

Foreign Military Sales

None

Nuclear Costs

None

Unit Cost

Unit Cost Reporting (Nunn McCurdy) is not required for Pre-Milestone B programs in accordance with section 2433, title 10, United States Code.

Unit Cost Reporting (Nunn McCurdy) is not required for Pre-Milestone B programs in accordance with section 2433, title 10, United States Code.

SAR Baseline History							
Item	SAR Planning Estimate	SAR Development Estimate	SAR Production Estimate	Current Estimate			
Milestone A	N/A	N/A	N/A	N/A			
Milestone B	N/A	N/A	N/A	N/A			
Milestone C	N/A	N/A	N/A	N/A			
IOC	N/A	N/A	N/A	N/A			
Total Cost (TY \$M)	353.4	N/A	N/A	349.6			
Total Quantity	0	N/A	N/A				
PAUC	N/A	N/A	N/A	N/A			

Cost Variance

PNVC Integrator

Summary TY \$M						
Item	RDT&E	Procurement	MILCON	Total		
SAR Baseline (Planning Estimate)	332.5	20.9	+	353.4		
Previous Changes						
Economic		**				
Quantity	4-	-	-			
Schedule			33			
Engineering		**				
Estimating	C++)					
Other	44	22				
Support						
Subtotal	44					
Current Changes						
Economic	44		**			
Quantity						
Schedule		-				
Engineering						
Estimating						
Other	**		22			
Support	**	**	-			
Subtotal	**		**			
Total Changes	**	- 77	77			
CE - Cost Variance	332.5	20.9	#	353.4		
CE - Cost & Funding	328.7	20.9	**	349.6		

	Summary BY 2018 \$M						
Item	RDT&E	Procurement	MILCON	Total			
SAR Baseline (Planning Estimate)	316.7	19.0		335.7			
Previous Changes							
Economic	94			-			
Quantity	44	-	44	-			
Schedule				-			
Engineering		/ -	-	4			
Estimating	+	**	77	-			
Other	**			-			
Support				-			
Subtotal							
Current Changes							
Economic		**		-			
Quantity			175	C 2			
Schedule	44		**	-			
Engineering			}_				
Estimating	42	44	44	-			
Other	4-		22	-			
Support	++			-			
Subtotal		**		-			
Total Changes		44	**	-			
CE - Cost Variance	316.7	19.0		335.7			
CE - Cost & Funding	313.0	19.0		332.0			

Initial SAR - Above variances (if any) reflect changes since the SAR Baseline/APB. SAR Baseline Reference: FY 2020 President's Budget

Contracts

General Notes

The PNVC Integrator Program was authorized to proceed with risk reduction and testing efforts in FY 2016. Since many of the components were developed and maintained using the Raytheon Indefinite Delivery Indefinite Quantity (IDIQ) Cost Plus Fixed Fee Command and Control Switching System (CCSS) contract, the initial PNVC Integrator Program contract efforts were accomplished using Delivery Orders (DOs) on that contract. The contract's Procuring Contracting Officer is assigned to another Air Force Materiel Command organization located at Hill Air Force Base (AFB), Utah which is remote from the Program Office located at Hanscom AFB, Massachusetts. All initiated contractual actions that are essential for PNVC must be executed remotely with different, but coordinated, processes and procedures. The CCSS contract does have a value exceeding the SAR reporting threshold, but the first three DOs for the PNVC Integrator contract have individual values less than the \$40M threshold. However, the total current definitized prices for the three DOs is \$39.7M, and may, in aggregate, exceed that value by the completion of those DOs due to the change in program requirements; therefore, Earned Value Management requirements and reporting are included on the last DO.

PNVC Integrator December 2018 SAR

Contract Identification

Appropriation: RDT&E

Contract Name: Raytheon, Command Control Switching System

Contractor: Raytheon

Contractor Location: 1001 Boston Post Road E

Marlborough, MA 01752-2377

Contract Number: FA8218-15-D-0001

Contract Type: Indefinite Delivery Indefinite Quantity (IDIQ)

Award Date: September 30, 2016

Definitization Date: September 30, 2016

				Contract Pri	ce		
Initial Co	ntract Price	(\$M)	Current Co	ntract Price (SM)	Estimated Pric	e At Completion (\$M)
Target	Ceiling	Qty	Target	Ceiling	Qty	Contractor	Program Manager
9.8	N/A	0	39.7	N/A	0	39.7	45.

Target Price Change Explanation

The difference between the Initial Contract Price Target and the Current Contract Price Target is due to additions made consistent with the program advancing from a risk reduction effort to a fully-approved Post-Milestone A program. The first contract risk reduction actions were performed under Delivery Order Number 1 (DO 1) for \$9.8M. An extension was made using DO 1.5 for \$3.1M to the previous efforts to develop a PNVC system specification and its associated analysis. After the MDA directed the start of Post-Milestone A in a Materiel Development Decison, the required contractor efforts were definitized using DO 2 for \$26.9M. The total for the three DOs is currently \$39.7M.

Contract Variance						
Item	Cost Variance	Schedule Variance				
Cumulative Variances To Date (12/31/2018)	+1060.7	-113.8				
Previous Cumulative Variances						
Net Change	+1060.7	-113.8				

Cost and Schedule Variance Explanations

The favorable cumulative cost variance is due to asset availability, which has driven both schedule and cost variances. This required adjustments to test planning and execution, however, the impacts were minimized using the contractor's agile management approach. The positive cost variance is acceptable within the remaining planned work for this contract period.

The unfavorable cumulative schedule variance is due to asset availability, which has driven both schedule and cost variances. This required adjustments to test planning and execution, however, the impacts were minimized using the contractor's agile management approach. The minor negative schedule variance has been accommodated within the contract period's slack.

General Contract Variance Explanation

Cost and Schedule variances on this contract have been minimal and accommodated within the PNVC Integrator Program's agile scheduling

Notes

This is the first time this contract is being reported.

Deliveries and Expenditures

Deliveries							
Delivered to Date	Planned to Date	Actual to Date	Total Quantity	Percent Delivered			
Development	0	0	0				
Production	0	0	0				
Total Program Quantity Delivered	0	0	0	-6-			

Expended and Appropriated (TY \$M)					
Total Acquisition Cost	349.6	Years Appropriated	5		
Expended to Date	98.2	Percent Years Appropriated	50.00%		
Percent Expended	28.09%	Appropriated to Date	130.7		
Total Funding Years	10	Percent Appropriated	37.39%		

The above data is current as of March 11, 2019.

Notes

The PNVC Integrator Program has no system or component deliverables since the PNVC efforts are dependent upon previously and future component developments that are accomplished elsewhere. The PNVC Integrator program performs system-level integration, validation and verification testing, and sustainment only.

Operating and Support Cost

Cost Estimate Details

Date of Estimate:

Source of Estimate:

0 Quantity to Sustain:

Unit of Measure:

20.00 Years Service Life per Unit:

FY 2023 - FY 2043 Fiscal Years in Service:

The PNVC Integrator Program does not yet have an approved O&S estimate

Sustainment Strategy

The strategy for sustainment and support of the PNVC baseband equipment will ensure that equipment is available and reliably performs its mission throughout its lifecycle. The sustainment program will follow a two-level maintenance concept for all fielded systems. Removal and replacement of all components will be performed at the organizational level. Currently, it is anticipated that the PNVC baseband equipment will be supported by Contractor Logistics Support (CLS). This includes sustaining engineering and technical assistance, depot level repair and refurbishment, supply support, and initial training.

Currently, CLS exists for Survivable Emergency Conferencing Network baseband equipment. Sustainment of the PNVC Baseband equipment will be added to the existing CLS contract. A separate CLS contract will be established for sustainment of the crypto equipment.

Antecedent Information

The SECN systems will be replaced at each site with PNVC components with the objective of improving the quality of service and availability for worldwide, secure and survivable voice conferencing between Presidential and National Senior Leaders.

Annual O&S Costs BY2018 \$M						
Cost Element	PNVC Integrator	SECN (Antecedent)				
Unit-Level Manpower	#					
Unit Operations						
Maintenance						
Sustaining Support	-					
Continuing System Improvements	4.27					
Indirect Support		-				
Other	4					
Total	4	77				

The PNVC Integrator Program does not yet have an approved O&S cost

	Total O&S Cost \$M					
Item	PNVC Integ					
nem -	APB Objective/Threshold		Current Estimate	SECN (Antecedent)		
Base Year	N/A	N/A	N/A	N/A		
Then Year	N/A	N/A	N/A	N/A		

The PNVC Integrator Program does not yet have an approved O&S cost

Disposal Estimate Details

Date of Estimate:

Source of Estimate:

Disposal/Demilitarization Total Cost (BY 2018 \$M):

The PNVC Integrator Program does not yet have an approved O&S or disposal cost