

Rebuttal to:

USDA Forest Service
Fire and Aviation management
Briefing Paper
Dated June 23, 2003
(attached hereto as Appendix A)

FROM:

Air Routing International, a partnership, of Houston, Texas, Ilyushin Aviation Joint Stock Company, of Moscow, Russia, and Total Corporate Aviation Services Ltd. a federal Canadian corporation; collectively, a joint venture in accordance with an October, 1995 contract and known internationally as "Global Emergency Response" ("GER"),

BY:

Tom Robinson, of Richmond, Virginia, agent and chief, duly appointed on the one hand by GER and on the other, by de facto waterbomber operator, the Russian Ministry of Emergency Situations, ("EMERCOM").

Issue: The IL-76 Waterbomber, Issues and Answers

Background: The Russian IL-76 waterbomber is represented in the US and several foreign markets by Global Emergency Response. The US Forest Service's 1994 IL-76 report forms the basis of a controversy surrounding non-use in the U.S and elsewhere. In this report, USFS experts attending the 1994 demonstration itemized technical and operational concerns (each of which was specifically disputed by GER but never peer-reviewed). In the ensuing nine (9) years, USFS personnel summarily resisted further IL-76 demonstrations despite several times being invited to participate.

Key Points

Certification and Bilateral Agreement Issues - Release of this USFS report, a report that in some material aspects Ilyushin called "unprofessional", began a nine-year campaign of USFS-directed half-truths and misinformation. The report states that the IL-76 has not been certificated to provide aviation services within the United States. It is ONLY true that the plane has not been certificated for COMMERCIAL service in the U.S. No commercial certification application has been made. IL-76 aircraft are still manufactured. New models are equipped with quieter engines that WOULD allow the aircraft to be certificated under FAA guidelines.

For nine (9) years, the current fleet of highly-reliable IL-76TDs now being used by EMERCOM successfully to manage and control wildfire in the world's largest forests have been continuously offered to the U.S. by GER and, in the alternative, under a standing government-to-government offer. Such use IS permitted under current FAA regulations.

Yet when voters, media, and politicians ask why the plane is not used in the U.S., USFS spokespersons withhold information tending to show the waterbomber can be used, substituting a half-truth.

Domestic vs. Foreign - For eight (8) of the past nine (9) years, USFS leadership intentionally misquoted the "ACT", answering EVERY inquiry with an outright lie, stating; "The Wildfire Suppression Assistance Act of 1989 PROHIBITS the USFS from using ANY foreign assets unless ALL U.S. assets are TOTALLY EXHAUSTED". Public statements changed only AFTER the Undersecretary of Agriculture admitted USFS was misquoting the ACT, ordering the practice

to stop. The ACT AUTHORIZES the Secretaries of Agriculture and Interior "to call out foreign assets at ANY TIME when such action would be in the best interest of the United States".

Safety and Suitability - USFS dictates that firefighting airplanes' retardant drops be made downhill. GER submits waterbomber flight management will allow the aircraft to be effective in most critical firefighting situations even in the absence of downhill drop capability. Indeed, it is arguable that downhill drops present unacceptable levels of stress on a firefighting aircraft's airframe and on crew members.

All firefighting airplanes except the National Guard's C-130 MAFFS system rely on gravity flow to drop liquids. The MAFFS system expels liquids under pressure, like aerosol spray, whose small droplets are easily dispersed by wind and heat. For this reason, GER submits gravity flow systems are far more efficient and effective than the MAFFS system. IL-76 waterbomber drops fall "as rain", showing exceptional penetration capability to the forest floor.

Unable to Disperse Long-Term Retardant - In yet another example of USFS misinformation, USFS broadcasts that the IL-76 is capable only of water suppression. The IL-76 can, and does, use ANY available firefighting agent, whether it is foam, retardant or just plain water. If the IL-76 is used in the U.S., however, for efficiency and environmental safety, GER highly recommends PYROCOOL in water solution. Toxic, highly-corrosive retardants demanded by the USFS contain cyanide and have been banned by some Governors and Congressional leaders. Damaging runoffs occurring after wildfires have caused massive fish kills and polluted waterways. PYROCOOL, a Presidential Green Chemistry Award-winner, is far more effective, cost-efficient, and completely benign, both to the environment and to the IL-76 tanking system.

Environmental Concerns - The USFS's rule "to avoid aerial application of retardant or foam within 300 feet of waterways", ONLY applies because the agency uses toxic materials. For several years the USFS has refused to consider using more effective, non-toxic chemicals fighting our devastating wildland fires. PYROCOOL and like assists are non-toxic, non-corrosive, less-expensive and benign.

Other concerns associated with the IL-76

Invitation to test - The Russian Federation highly desires to demonstrate the versatile, formidable IL-76 waterbomber in the United States. USFS spokespersons repeatedly say "because the plane is illegal, does not make downhill drops, holds too much water, is too large, is too fast", etc., however, the IL-76 will NEVER be considered for USFS contracts, let alone be approved by the International Air Tanker Board. [Attached as "Appendix B" to this submission is GER's response to an invitation recently solicited to consider such a demonstration.]

List of crashes - In a most regrettable example of USFS bad faith, the USFS labels the IL-76 "unsafe". By one measure, the IL-76 has a far better air-safety record than does the venerable U.S. C-130 Hercules. IL-76 accidents have indeed been attributed to poor maintenance, pilot error, air traffic controllers' error, and missile attacks during the Soviet war in Afghanistan, but NEVER to inherent design flaws. Consider that the world's undisputed aviation authority, "JANE'S, ALL THE WORLD'S AIRCRAFT", hails the IL-76 as "the workhorse of the former Soviet Air Force", able to land and take off from short, unimproved, grass strips because of its powerful engines and durable design". Federal Policy - Federal policy alluded to by the International Air Tanker Board and USFS is effectively controlled by them, hence their refusal to consider new, proven methods of fighting wildland fires. That ruling could easily be changed at any time in a simple exercise of Secretarial discretion.

Operations Plan - In another half truth, USFS submits the IL-76 waterbomber could not be used at most current air tanker bases in the U. S.. More than sufficient alternative municipal and federal bases exist comfortably accommodating the IL-76. Again, local convenience is compensated with speed. The current USFS air tanker fleet is replete with small and (generally) aging air tankers. With the advent of the IL-76, these air tankers should be considered tactical. The IL-76's highest and best use is as a line-builder. Indeed, USFS expert Joe Madar called it

the "world's best line-builder", further indicating that the biggest operational problem the USFS would experience with the airplane would be the extremely high level of public demand for its services in emergency situations, i.e. once people saw what it could do, nothing else would do. Truly, the IL-76 is the world's first (and only) strategic firefighting platform. Accordingly, operational adjustments would be a fundamental requirement of use of the IL-76.

The waterbomber is a giant, 4-engine, jet aircraft, capable of outperforming as many as ten (10) U. S. air-tankers at one time. (Even if ten (10) smaller U.S. contractor aircraft were deployed where a single IL-76 would do, these little aircraft could never lay down a continuous, un-interrupted line of retardant.) Its size and requirements therefore suggest and GER submits, that for purposes of allowing the US Forest Service to adapt to its use, the IL-76 be based initially at USAF/ANG bases capable of dispatching and managing similar aircraft. Because of its high speed, the IL-76 can reach any fire scene very quickly. Although it can reach a fire scene much faster than any other plane in the U. S. arsenal, once there, the waterbomber makes retardant drops at approximately the same speed from approximately the same height as any other air tanker, (another technical area where, the public record shows, USFS spokespersons have misled the public).

Crew requirements - Neither the Russian Federation nor GER is selling waterbombers. Their proposed use is as a service. IL-76s would arrive pre-fire season, with a full crew of qualified pilots, navigators, mechanics, other support personnel, and normal spare parts, departing end-season. No USFS personnel would be required (or requested) to assist operations. The speed, capacity and efficiency of the IL-76 would dictate that the military direct the plane's operation, at least for purposes of adapting to its use. Able to douse biomass due to be overtaken by wildland fire over an area equal to twelve (12) football fields with one, ten-second drop, the waterbomber can replace several smaller air-tankers at one time. The IL-76 easily and safely enters fire scenes, douses areas threatened by the blaze, and then returns to base, thus, in any proposed US deployment alleviating the need for numerous expensive spotter planes and smaller air tankers and measurably cutting down cluttered air traffic common in current US suppression situations. Each waterbomber comes equipped with a heat-seeking infrared detection device which identifies the hottest sections of the fire and strategically pin-points best-drop retardant target areas.

Summary - As was stated in the briefing paper, "the Forest Service investigated the potential use of the IL-76 in 1994, and identified several safety and operational concerns", thereby indirectly admitting that since 1994, the agency has refused to accept several invitations to participate in additional testing and firefighting demonstrations. Ironically, several state and local fire chiefs and administrators, FEMA Directors, and military leaders took time to attend those demonstrations, returning to the U. S. very enthusiastically commenting on the plane's performance. By comparison, the USFS's own report was shelved for several months until an inquiry from Senator Phil Gramm prompted its delayed release. When the report was finally made public it did not, in any way, reflect the enthusiastic comments made by its author, Joe Madar (d), during the actual demonstrations. During the two-day event, Mr. Madar, the USFS's Aviation Specialist, during an interview on BBC Television, used comments, such as: "Perfect! Perfect!I didn't think it would EVER stop dropping water!" Even in its watered-down, equivocal, written report, statements such as: "the plane would be effective in fighting the California-type fires", "It could serve as a supplemental air-tanker in the U. S. as early as 1995", were included.

GER respectfully submits that until this matter is brought into the open, before a Congressional Committee, the USFS will remain in a state of denial, mired in bureaucracy and corruption, unwilling and seemingly unable to reach out, exploring new, more efficient, and far more effective methods to protect our citizens and communities from devastation, personal and financial loss, injury and even death caused by our ever-increasing wildland fires and enhancing our capability to exercise responsible and capable stewardship of the environment.

Furthermore, it is at least arguable and GER submits that the Forest Service has a duty thoroughly and professionally to examine new firefighting resources and timely, in a forthright manner, to report with professional integrity its findings. It is at least arguable and it is our

submission that by failing each and every facet of this duty, the US Forest Service has effectively frozen out of service by far the world's most formidable firefighting weapon as both Canada and to a lesser degree, Australia, have followed the US Forest Service's disappointing lead nowhere on the IL-76 waterbomber.

In closing, in so many words, Tom Edmison, GER representative at the initial USFS test, was given to believe by USFS' Madar that if USFS wanted the IL-76, a few small changes would be made and the IL-76 let in; and a close examination of the equivocal test report so indicates. With greatest respect to Mr. Madar, whose personal integrity has never been questioned, he never lived to see this wonderful aircraft given the chance he believed it deserved.

ALL OF WHICH IS REPECTFULLY SUBMITTED

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Appendix B attached to and forming part of a rebuttal to the US Department of Agriculture by Global Emergency Response, dated August ____, 2003 addressed to Senator Carl Levin and delivered: July 18, 2003 3:10 PM MST

Dear Cassandra Woods;

Bill Kauffman asked that we inform you of the following, all in accordance with a contract made between Ilyushin Aviation Joint Stock Company ("Ilyushin"), Air Routing International Corporation ("ARIC"), and Total Corporate Aviation Services Ltd. ("TCA") dated October, 1995. ("the joint venture") TCA and ARIC are prepared to recommend to our joint venture partner, Ilyushin, that Ilyushin secure a suitable IL-76TD aircraft and nominate a suitable IL-76 TD operator to fly to the United States to demonstrate the 'waterbomber' on the following terms and conditions:

1. "Host" shall mean that agent of the United States government, authorized to issue an invitation for demonstration purposes
2. Host shall issue a demonstration invitation to the joint venture incorporating these conditions:
 - A. The parties shall assume that 25 hours shall be required for ferrying and a demonstration.
 - B. Host shall pay to ARIC \$10K/hr., half in advance, half within 30 days of execution of the demonstration.
 - C. Any hours or part of hours flown beyond 25 hours logged shall be paid for and billed at \$10K/hr.
 - D. Host shall assume and pay for all costs, excepting operating costs and maintenance, which shall be for the account of the joint venture, such Host's costs to include;
 1. fuel
 2. in flight and overflight permits, landing fees, parking fees, meteorological services, security
 3. crew (and management) room, board, and ground transportation
 4. destination services for demonstration requirements, including plumbing and fuel services

We recommend that the US military provide an airbase for demonstration and facilitate all entry requirements for Russian personnel. We feel utilizing all the many services of the military provides many benefits including better logistical control and an enhanced level of security. As well, the main expense of the demonstration will be fuel. Military fuel is far less costly than commercial fuel.

Respectfully yours,

John Anderson
for Total Corporate Aviation Services Ltd.
of the Global Emergency Response joint venture
www.waterbomber.com
Calgary - Houston - Richmond - Moscow - Lima