

NOT FOR PUBLICATION UNTIL RELEASED BY
THE HOUSE ARMED SERVICES COMMITTEE
SUBCOMMITTEES ON SEAPOWER AND READINESS

STATEMENT OF
VICE ADMIRAL RICHARD BROWN
COMMANDER NAVAL SURFACE FORCES

BEFORE THE
SUBCOMMITTEES ON SEAPOWER AND READINESS
HOUSE ARMED SERVICES COMMITTEE
ON
UNIT READINESS IN THE PACIFIC FLEET

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Chairman Garamendi, Chairman Courtney, Ranking Members Lamborn and Wittman, and distinguished members of the subcommittees, thank you for the opportunity to update you on Surface Warfare's continued readiness improvements. Our Navy's commitment to the Strategic Readiness Review (SRR) and Comprehensive Review (CR) findings positions our Surface Force manned, trained, and equipped for success. These readiness enhancements, coupled with state-of-the-art technologies, warfighting proficiency, and a culture of excellence will continue to ensure we remain the world's premier Surface Force. On behalf of Navy Sailors, Civilians, and families serving around the world, thank you for the investments you have made in forging our readiness. Your support enables the reliable resources needed in order to control the seas and provide the nation with combat naval power when and where needed.

Battlespace Summary

America is a maritime nation whose national interests require that we operate forward. Our National Security Strategy (NSS) and National Defense Strategy (NDS) highlight the reemergence of great power competition, which requires us to control the seas. In peacetime, our Navy provides stability, homeland defense, protection of sea lanes, and conflict deterrence on the high seas. When deterrence fails however, our Navy's forward presence ensures the ability to promptly conduct decisive combat operations and defeat any enemy. We go to sea to safeguard the rights and freedoms of other sea-going nations. We control the seas, because if we do not, someone else will.

Both the threats for which our Navy must be prepared and the battlespaces in which we will fight are changing. Our adversaries and operating environments are increasingly lethal and disruptive. Adapting to this reality, we are responding with urgency to sustain our advantage in maritime competition. Our national interests demand a Navy with the capability, proficiency, and confidence to be lethal at a moment's notice. Hence, as the lead Surface Force Type Commander, my principal objective is to transform and sustain the readiness cultivated via implementation of SRR, CR, and other objectives into the lethality needed to win the fight against any maritime adversary.

Premier naval forces understand the simultaneous need to command the seas today while preparing for victory at sea tomorrow. As such, we are committed to both fighting with the 'Navy the Nation Has' and building the 'Navy the Nation Needs.' Our ability to 'Own Tomorrow's Fight Today' requires both readiness and modernization. We must build and sustain a lethal force through balanced investments that holistically enhance both capability and capacity. To ensure combat effectiveness within any battlespace, the Navy must grow in size, lethality, and networking, and remain fully integrated with Marine Corps doctrine and combat capabilities.

We are the world's premier Navy, second to none, that controls the seas and provides the nation with combat naval power when and where needed. The initiatives and policies implemented within our Navy and Surface Force since 2017 are not an end unto themselves. Instead, they are a cornerstone of Type Commander efforts to man, train, and equip our Surface Force; and integral to the Surface Navy's generation of combat ready-ships and battle-minded crews. This focus will endure.

Readiness State of Play

The tragic events of 2017 generated critical lessons that have been embraced across all operational and administrative chains of command. Barriers have been removed that could impede timely, effective, and sustainable implementation of SRR/CR objectives. When and where necessary, SRR/CR objectives (and their supporting requirements) produced funding prioritization in support of decisive action. Commanding Officers (COs) and their crews are well educated on both the specific areas in which our Navy slowly deviated from established norms, and the fundamental process improvements that have been undertaken. Most importantly, the policy, procedural, and budgetary mechanisms needed to sustain this progress are in place. Our Navy's operations in 2020 are safer and more effective than in 2017, and have been incrementally refined since the 2019 update provided to the House Armed Services Committee (HASC) - Seapower and Readiness Sub-committees. We broke the "normalization of deviation" that plagued 2017 operations, and implemented the foundational changes needed to strengthen our Navy's culture.

With the utmost urgency, we undertook decisive measures to enhance the development, assessment, and sustainment of proficiency at both individual and watch team levels. Concurrently, we reestablished "firebreaks" by more effectively balancing maintenance, training, and operations pursuant to maximizing both operational readiness and safety. The Secretary of the Navy (SECNAV) and Chief of Naval Operations (CNO) employed a three-tier process for achieving a Navy and Surface Force culture of excellence, defined by a dedicated oversight body comprised of military and civilian leaders, and predicated upon the outcomes resultant from holistic implementation of SRR/CR/Fleet/Type Commander (TYCOM) initiatives.

Tier 1 efforts successfully validated safety of operations by leveraging SRR/CR findings to make readiness and risk management assessments of Surface Force units, immediately implement requisite corrective measures, and ensure compliance and accountability at all chain of command levels. Tier 2 actions span an indefinite period in which the Navy conducts more effective operations subject to enhanced Force Development, Force Generation, Force Employment and risk mitigation mechanisms, rigorously reevaluates early results to determine if further refinements are required. This period compiles "run-time" subject to processes and standards that develop a culture compliant with practices foundational to safe and effective operations at sea. Tier 3 efforts further raise the bar for fleet readiness, by forging standards that enable long-term success and excellence.

In the pursuit of a culture of operational excellence, a culture of compliance was initially required in order to change behavior and risk management decision processes that had deteriorated over time. That culture of compliance, however, was insufficient for our Navy to win decisively during high-end conflict. The culture of operational excellence borne by combat ready-ships with battle-minded crews embodies standards as the minimum baseline, rather than the goal. While it values processes, it focuses more on outcomes and employs a command-centric, trust-based methodology. Most importantly, a culture of operational excellence equips our COs and crews with the tools, training, experience, toughness, and competitive boldness needed to fight and win; it also empowers them and holds them accountable.

While diligent efforts across all chains of command enhance readiness, crews who exhibit toughness, competence, and confidence to transform readiness into lethality are achieving a culture of operational excellence. The passion and precision with which our Surface Forces are driving, fighting, managing, and commanding their ships since 2017 places our Navy on a steady glideslope toward a culture of operational excellence. To forge this progress, we are continuing investments in the professional development of our officer and enlisted personnel, improving the material readiness of our warfighting platforms, and conducting more challenging training and assessments of our watch teams. Witnessing this unyielding commitment from their leadership, our personnel are further inspired to prevail in combat against any potential foe.

The following topic areas address noteworthy accomplishments within Navy's efforts to implement SRR/CR findings, rebuild warfighting readiness, and forge lethality.

Aligning Surface Force Generation and Surface Force Employment: The Optimized Fleet Response Plan (OFRP) readiness production process remains the cornerstone of the Navy's force generation framework. As the OFRP strives to ensure the best balance of ready naval forces pursuant to Combatant Commander demands and foster the best posture against emerging threats and new mission requirements, alignment between Type Commander and Numbered Fleet Commanders has notably increased in order to better manage risk. The following systematic processes increase unit-level readiness and foster an enhanced balance of friction between force generation and operations between the Surface Type Commanders and the Numbered Fleet Commanders.

- Surface Force Type Commanders strive to deploy ships that bear all of the following attributes: all Basic Phase certifications complete, manning at or above 92% Fit and 95% Fill thresholds, and no active equipment Casualty Reports (CASREPs). If situations arise that may require operational employment of a ship that has not completed Basic Phase Tier 1 and Tier 2 training, the applicable Type Commander and Numbered Fleet Commander are employing deliberate scheduling, by mutually evaluating the proposed mission against the readiness of all potential assets. If necessary, 4-star Fleet Commanders will make these operational decisions.

- Ready for Sea Assessments (RFSAs), originally utilized to validate "safety for operations" across Forward Deployed Naval Forces-Japan (FDNF-J) units, subsequently extended to all ships worldwide. The Surface Force Training and Readiness Manual (SFTRM) incorporated the RFSA agenda as the readiness requirement for ships exiting the OFRP Maintenance Phase prior to commencement of Basic Phase training underway events.

- In accordance with SRR/CR requirements, Navy defined FDNF-J maintenance periods, training allocations, and operational scheduling procedures. Specifically, FDNF-J ships undergo a 17-week Selected Restricted Availability (SRA) and a 10-week Selected Incremental Availability (SIA) within each OFRP cycle. Following maintenance, FDNF-J ships will be afforded an 18-week training period following maintenance periods totaling 6-months or greater, and a 10-week training period following maintenance periods totaling less than 6-months.

- 90-Day CO Readiness Reports to TYCOMs provide a means of CO communication of readiness concerns directly to the TYCOM within 90 days of command assumption, thus spearheading immediate and tailored TYCOM-level action.

Surface Force Manning: As Navy force structure increases, end-strength increases will also be required. Pursuant to manning today's force structure, the Navy continues to aggressively manage available inventory to ensure deployed forces meet Fit/Fill requirements, while minimizing risk within our non-deployed forces. Effectiveness involves a combination of distributable inventory and Type Commander manning actions. Gaps in mid-grade to senior enlisted ranks remain the most challenging due to the time required to cultivate these experience levels. While overall inventory is increasing, funded billet growth is also increasing, thus masking gains made in improved manning at the unit level for a greater portion of the OFRP cycle. Bottom line, there are more Sailors on our ships today than there were in 2017. Specific initiatives involving manpower allocations and/or manning increases taken in response to SRR/CR findings include:

- Transformation of Navy's Fleet Manpower Requirements Determination (FMRD) process, allowing for more refined manpower requirements analysis and providing a more accurate demand signal for the Fleet.
- Transition from a wartime Condition I/III (at-sea) manpower model to an operational model now including in-port (Cond V) workload, thus accounting for the holistic workload demands levied upon our Sailors while at sea or in-port across all surface ships.
- Reassessment of the Navy's Operational Afloat Workweek (OAW) (previously called Navy Standard Workweek), resulting in an 81 hour workweek, with a decrease to the Productive Availability Factor (PAF) (productive time available for watchstanding, maintenance and other activities) from 70 to 67 hours/week.
- Revalidation of the independent modeling capabilities that supplement the FMRD and forecast manpower requirements and personnel needs according to future force structure plans. This ensures accurate future manpower programming within each annual programming and budgeting cycle, as well as cost estimates beyond the Future Years Defense Program (FYDP), including the 30-year shipbuilding plan estimates.
- FDNF manning is prioritized (constant 92/95 Fit/Fill) relative to other manning requirements, and specific mechanisms to support such have been implemented. These include: changes to overseas tour lengths for accompanied and unaccompanied first-term enlistees, refinement of overseas duty and sea duty screening procedures, and enhancement of Overseas Tour Extension Incentives Program (OTEIP) initiatives.
- Establishment of Embedded Mental Health (EMH) teams within Fleet Concentration Areas (FCAs). EMH teams include: Psychiatrists, Licensed Clinical Social Workers, Clinical Psychologists, Mental Health Nurse Practitioners, and Behavioral Health Technicians. EMH teams provide a shipboard mental health resource that facilitates both intervention and prevention in order to de-incentivize mental illness, destigmatize mental health help-seeking, foster return to duty, and enhance readiness.

Commensurate with Navy's dedication to enhancing fatigue management aboard our ships, the impact of the manpower/manning enhancements will be evaluated over time for their impact upon both operational effectiveness and workload management. If additional manpower requirements are necessary to optimally support one or both of these objectives, they will be considered on an annual basis.

Surface Force Training and Assessment: Spearheaded by Surface Warfare investments, our Navy continues to emphasize Fleet Training Wholeness (FTW). Modernized Unit and Strike Group training consisting of three pillars define FTW: enhanced targets, appropriately developed and supported ranges, and Live Virtual Constructive (LVC) integration. LVC enables training within a contested environment by consolidating

underway ships and aircraft operating on “live” ranges, integrated with “virtual” assets (pier-side ship participants and air-wing simulators), and augmented with “constructive” synthetic scenario entities.

Concurrently, our Surface Force is broadening the use of instructor led, immersive virtual reality training as part of our Surface Training Advanced Virtual Environment (STAVE) Program. STAVE couples modernized, instructor-led, individual training with virtual training devices, hands-on labs, and distributed, networked classrooms. Future STAVE efforts will expand this training to ships underway and pier-side. STAVE training and assessment results continue to illustrate effectiveness and efficiency of this training concept relative to traditional methods. In short, STAVE prepares watch teams to own tomorrow’s fight today, by cultivating personnel who bear experience, assessment, and confidence within the most demanding tactical environments.

Additional policies and facilities that have enhanced Fleet training include:

- Fleet-wide SFTRM implementation ensured elimination of the inefficient Block Phase Training within the Basic Phase, emphasizing the Train to Certify (T2C) concept, and returning valuable training time for the CO to use on needed enhancements. The T2C concept, which dedicates Afloat Training Group resources exclusively to watchstander training (vice Training Teams) until certification is achieved within each warfare area, promotes greater efficiency and faster results. Collectively, these enhancements foster earlier certification within each warfare area.
- Surface Warfare Advanced Tactical Training (SWATT) exercises are structured to incorporate emerging threats and to practice Tactics, Techniques, and Procedures (TTPs). Additionally, SWATTs have been extended to FDNF forces as a primary means of enhancing Integrated Phase training and Strike Group warfighting effectiveness.
- Leveraging Congressional investments made in response to SRR/CR findings, facilities improvements spearheading Bridge and Combat Information Center (CIC) integration have been (and continue to be) implemented. Shore-side Navigation, Seamanship, and Shiphandling Trainers (NSSTs) received rudimentary Bridge/CIC integration capabilities across all Fleet Concentration Areas (FCAs) within 12 months of funding receipt, thus becoming Modified-NSST (M-NSSTs). Full Bridge/CIC integration is on-track for delivery to each FCA by FY-22, via Integrated-NSSTs (I-NSSTs). Maritime Skills Training Centers (MSTCs), containing the highest concentration of officer, enlisted, and watch team resources and the multiple high-fidelity simulators maximizing Bridge/CIC integration are on track for delivery in San Diego by FY-21 and Norfolk by FY-22.
- Summer 2019 establishment of the Junior Officer of the Deck (JOOD) Course in Norfolk, San Diego, and Newport yielded a profound Navigation, Seamanship, and Shiphandling (NSS) enhancement at junior officer levels. The high quality curriculum, dedicated instructor interaction, and repetition frequency on high density shipping and in-extremis maneuvering scenarios facilitated 462 graduates in 2019 (with no shipboard experience). This cohort outperformed the officers with 1-2 years shipboard experience tested during 2018 Fleet Officer of the Deck (OOD) Competency Checks. Specifically, JOOD course graduates yielded an increase from 16% to 21% in officers bearing “No Deficiencies” and a decrease from 18% to 2% in officers bearing “Significant Deficiencies.”
- NSS assessments at all milestone levels ensure sustainment of mariner skills proficiency. Go/No-Go assessments resulted in attrition of officers at the Department Head, Command, and Major Command levels who were unable to demonstrate the requisite NSS proficiency standards. Specifically, seven prospective Commanding Officer and three

prospective Major Commanders were removed from their respective command pipeline training based on Go/No-Go assessment performance.

- Afloat COs and their respective Bridge/CIC watch teams consistently cite Bridge Resource Management Workshops with post-Major Command CO mentors and Strategic Sealift Officer (SSOs) as invaluable in enhancing NSS proficiency at individual and Bridge/CIC team levels.

- The Surface Force reduced Inspections, Certifications, and Assist Visits (ICAVs) by approximately 30% per ship class. Such is the cumulative result of dedicated ICAV reduction measures and the elimination of Block Phase Training across the Basic Phase.

- Increased Surface Warfare Officers School (SWOS) milestone curriculum, simulators, and simulator instructors bear U.S. Coast Guard certifications. Additionally, the Surface Force progressively adopted maritime industry Standards of Training, Certification, and Watchkeeping (STCW) into Surface Warfare Officer (SWO) and enlisted training where such elements aligned to Surface Warfare core competencies.

- Two years of run-time exists under the contents of a revised NSST instruction, which defines the requirements for Navigation Assessments conducted by Immediate Superiors in Command (ISICs). These Navigation “check-rides” increased in scope to include evaluation of Bridge/CIC integration and watch team performance during simulator scenarios involving high-density shipping and in-extremis maneuvering.

- In support of cultivating toughness and warfighting excellence under stress, Basic Phase training now culminates with a Final Battle Problem that flexes all warfighting expertise across multiple mission areas for an extended period. The complexity and duration of this scenario commands not only tactical expertise, but also effective personnel rotation and stress/fatigue management, as combat operations would involve.

Surface Force Maintenance and Modernization: “Performance to Plan” (P2P) initiatives implemented by Type Commanders are paying dividends with respect to completion of depot maintenance on time and in full. P2P-Surface efforts are fostering noteworthy improvements in maintenance timeliness, without de-scoping work packages or deferring maintenance requirements. These efforts facilitate accomplishment of previously deferred maintenance actions, decompressing training, improving risk management, and enhancing force generation efficiency. Our main objective remains improvement of predictability and stability throughout the maintenance planning and execution processes. We are ensuring comprehensive definitions of maintenance requirements throughout our ships’ life cycles. Concurrently, we are forging project milestone adherence, including timely procurement of long-lead time material. Since P2P implementation, progress on these collective fronts improved our ability to eliminate/minimize burdensome approval processes in situations in which new or growth work arose. Tank and engine intake repairs stand as the most noteworthy examples of this progress. While the aforementioned processes enhanced material management, the following material enhancements also forge warfighting readiness and effective risk management:

- While ensuring that current readiness remains the top TYCOM priority, aggressive Surface Force efforts are spearheading advancements in weapons, networks, sensors, and platforms. These vital capabilities include: Flight III DDG-51 class guided-missile destroyers; a new class of frigate (FFG(X)); a new large surface combatant; the SPY-6 Air and Missile Defense Radar; Maritime Strike Tomahawk; Naval Integrated Architecture; medium and large unmanned surface vessels; hypersonic weapons; Standard Missiles for offensive missions, and Naval Strike Missile.

- Integrated Bridge and Navigation System (IBNS) lessons learned have been collected and incorporated across all applicable surface platforms.
- Class Advisories addressing steering system configuration and casualty control across all modes of operation are disseminated and implemented across all surface ship classes.
- The ongoing installation of a standardized Commercial of the Shelf (COTS) radar as a tertiary resource, and the incorporation of a secondary Automated Information System (AIS) laptop aboard all surface ships, is enhancing NSS redundancy.

Forging Warfighting Readiness & Culture of Excellence: Over the preceding year, throughput across all milestones of SWO training and assessment continuum increased in accordance with an updated Surface Warfare Officer Requirements Document (SWORD). Additionally, the recently promulgated SWO Career Manual consolidated SWO qualification and proficiency requirements. The following actions further enhanced warfighting readiness and culture at individual and team levels:

- With the help of Congress and Navy leadership, the Surface Force made (and continues to make) substantial and lasting investments in mariner skills. While we are not declaring “mission complete,” the pace of the enhancements—coupled with their initial results—are cause for optimism. FYDP investments to individual, watchteam and strike group training total \$3.7B.
- Surface Development Squadron ONE is established and dedicated to the rapid development of manned and unmanned capabilities, to include authoring of the Navy’s Concept of Operations (CONOPS) for the unmanned Surface Fleet.
- The Naval Surface and Mine Warfighting Development Center (SMWDC) is steadily improving warfighting skills by increasing individual expertise and watch team proficiency. The Warfare Tactics Instructor (WTI) program produces SWOs with advanced expertise as instructors and tacticians in one of four warfighting areas: antisubmarine/surface warfare (ASW/SUW), amphibious warfare (AMW), integrated air & missile defense (IAMD), or mine warfare (MIW).
- Consistent with post-SRR/CR improvements in NSS training and assessment, the Surface Force is equally committed to forging Maritime Warfare prowess and formidability. SMWDC is leading a Maritime Warfare Officer Tactical Training (M-WOTT) Working Group, which is charged with determining the skills required for each tactical milestone within a SWO’s career, and the manner in which maritime warfare proficiency can be best developed, assessed, and sustained.
- Combined Integrated Air and Missile Defense and ASW Trainers (CIAT) are in place in San Diego and Norfolk. Within those facilities, watch teams of specific AEGIS baselines train with the exact hardware, tactical software, and environmental factors they would experience within combat environments
- On Demand Trainers (ODTs), are also in place in San Diego and Norfolk, in support of continuing tactical training during maintenance availabilities and/or Combat Systems upgrades.
- The Surface Force validated Personnel Qualification Standards (PQS) for all Bridge/CIC watchstations and created PQS for several positions that did not previously exist. This review identified situations requiring requalification, which included assignment of temporary personnel and following major equipment upgrades.
- Through an emphasis upon Human Factors Engineering (HFE) expertise, the Surface Force developed several inter-related approaches to increase operational risk

awareness, measure crew perceptions and performance, and improve daily risk management at sea. Key examples include:

- In collaboration with the Naval Postgraduate School (NPS) and Navy Health Research Laboratory, the Surface Force developed a Basis for Measurement (BFM) and a data collection method that assess fatigue management effectiveness during the OFRP cycle, and proposes potential interventions to improve results. Organizational Drift Indicators (ODI) are assessed during Afloat Safety Climate Assessment Surveys (and debriefed to CO's) at two specific points during the operational cycle, and Crew Endurance policy implementation metrics are collected regularly during both internal and external assessments.

- SWOS, Navy Leadership and Ethics Center (NLEC), and the Senior Enlisted Academy (SEA) expanded curricula to include Plan, Brief, Execute, and Debrief (PBED), and applied Operational Risk Management (ORM) principles. The Surface Force developed Operational Fundamentals Behavioral Checklists (OBFCS) for assessing team performance in daily operations. Tailored to each stage of the PBED cycle, these indicators gauge team health in daily operations, recognizing and overcoming errors.

- Through dedicated adherence to Near Miss Reporting practices, the Surface Force is becoming increasingly proactive. By tailoring lessons learned for each type of ship and each phase of the operational cycle, we are directly targeting and preventing the most likely and most dangerous mishaps. Over a multi-year period culminating in 2019, a clear correlation emerged between a steady increase in Near Miss Reports, and corresponding decrease in Class A and Class B mishaps.

Conclusions

As the world's premier Navy, we must be prepared to fight on short notice. Current readiness, as defined by combat ready ships with battle-minded crews, is the imperative. As our Navy aggressively grows force structure over the next decade, current readiness must remain our primary focus. Amidst the reality of competing fiscal priorities, forging current readiness requires analytical rigor and data-driven assessment of our current procedures and their outcomes. While readiness enhancement continues with urgency, mere readiness recovery is insufficient to ensure tactical success. Instead, the transformation of readiness into lethality is paramount. In pursuit of this objective, operational and administrative chains of command are collaborating to hone our warfighting skills and field a maritime force that is manned, trained, equipped, certified, and ready to win tomorrow's fight today.

As the lead Surface Force Type Commander, I am inspired by our Navy enterprise efforts to enhance the development, assessment, and sustainment of proficiency at individual and watch team levels, and to restore the "firebreaks" between maintenance, training, and operations. As such, I am fully committed to the following near-term objectives:

- Emphasizing current readiness (across man, train, and equip pillars) as the number one Type Commander priority. Specifically, completing maintenance availabilities on time without de-scoping work packages or deferring maintenance requirements, supporting Ready Relevant Learning (RRL) initiatives, and manning ships earlier and better in the readiness cycle.

- Continuing to enhance mariner skills training. This includes previously mentioned classroom instruction, advanced simulators, and a career-long training

continuum. While we have made considerable progress, this job is never complete, as improvements need oversight and constant evaluation.

- Continuing warfighting training improvements and establishing a maritime warfare continuum that matches the NSS training and assessment continuum implemented over the preceding two years. The keys to accomplishment include: better exercise support, identification of the best junior officers as WTI candidates, and proliferating high-fidelity trainers that leverage LVC capabilities and promote Fleet Training Wholeness. This will ensure our effective employment of future sensors, weapons, and platforms.

- Ensuring alignment between the Surface Type Commanders and Surface Warfare Resource Sponsors (OPNAV N-95, N-96, N2N6) to deliver warfighting capabilities essential to the future fight, and field the most capable, experienced, and confident COs and Warfare Commanders.

Pursuant to these and other Surface Force objectives, I will ensure that all public and private members of the Surface warfare enterprise decisively remove any/all barriers that undermine current readiness. Such is a cornerstone in the timely deployment of combat-ready ships with battle-minded crews. While we build a Surface Force that stands ready to own tomorrow's fight today, we must continue to control the seas and provide the nation with combat naval power when and where needed – every day. This tenet epitomizes current readiness criticality.

Remaining the world's premier Surface Force requires collaboration at all levels. As such, budget stability is an imperative. Continuing Resolutions significantly impede the predictability of the man, train, and equip pillars upon which current readiness depends. Your continued support of our Navy, our Sailors, and our readiness, will define our ability to support U.S. interests worldwide, by ensuring the capacity, competence, and confidence to control the seas and provide the nation with combat power when and where needed.