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STATEMENT OF RICHARD ANDREWS
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BEFORE THE HOUSE COMMITTEE ON
TRANSPORTATION AND INFRASTRUCTURE

ON
CRITICAL LAPSES IN FAA SAFETY OVERSIGHT OF AIRLINES:
ABUSES OF REGULATORY "PARTNERSHIP PROGRAMS"

APRIL 3, 2008

My name is Richard Andrews. I was employed as an aviation safety inspector by the Federal Aviation Administration (FAA) at the American Eagle Certificate Management Office (AMR CMO) in the Southwest Region assigned as the SF-340 aircrew program manager until March 31, 2008. I am a member of the Professional Aviation Safety Specialists, AFL-CIO (PASS) and served as the PASS representative for the American Eagle Airlines, Inc. (AE) Operations Unit in the AMR CMO.

I worked for the FAA for over 31 years. During that time, I have witnessed dramatic changes in the aviation industry. When I first started my career with the FAA, safety of the system was the priority. With the financial hardships facing many of the airlines and pay for performance mentality of managers, safety has become a second thought. My work at the AMR CMO has proven to me that management's primary goal is to fulfill quotas for the office. In other words, getting the job done quickly is the focus rather than getting the job done right.

As with many facilities across the country, the AMR CMO is understaffed and the unit is forced to answer to managers with limited experience. Individuals have been placed in management positions with inadequate experience to address specific issues related to inspectors and the equipment and services they are charged with overseeing. In fact, my unit is managed by an airworthiness inspector with no operations background and a dispatcher with no real flight, certification or cabin safety experience beyond his dispatcher's certificate and student pilot license.

The staffing situation at the AMR CMO made it nearly impossible to complete all of the work, but that did not stop management from insisting that the work be done no matter the consequences. Eighteen months ago, the operations unit was staffed with 13 FAA employees and the number dwindled down to five inspectors. However, in February 2008, when the FAA learned of this hearing, the operations unit was completely re-staffed with new hires and crossovers from General Aviation. While the additional staffing is an improvement, the new hires are not fully trained and require over a year of training, which will create even more work for the remaining inspectors at the facility.

As FAA inspectors, we are a workforce trained to focus only on the safety of the system. It is beyond frustrating when we discover a problem with an air carrier and are prevented from doing anything about it. We are usually stopped in our tracks by several layers of management and the FAA's focus on pleasing the airlines. In addition, inspectors are now assigned so much administrative work that is chaining us to our desks when we should be out in the field as the eyes and ears of the FAA. Thirty-one years ago, I was out in the field with my hands on the airplanes looking for safety problems and I had the power to make a difference. Now, in the age of self disclosure and the tight relationship between FAA management and the airlines, inspectors are sitting at their desks entering information into a computer. Unfortunately, what suffers most from all of this is the safety of the system.

I am thankful that this committee is paying attention to the FAA's dedication to satisfying the customer. However, the "customer" in this case is not the flying public, as one would expect. The customer is the airline and this focus is placing the entire aviation system at risk. I have experienced the repercussions of this relationship many times over the past several years, but a

recent incident shows the dangers involved. In October 2007, I met with the AMR CMO assistant manager and principal operations inspector (POI) to discuss the status of American Eagle's flight operations and training. The assistant manager agreed that American Eagle should be under stress surveillance and asked that I start doing some in-depth evaluations of its manuals and programs. It is important to note that American Eagle flight operations has presented indicators that would justify enhanced surveillance for some time now. Included among these indicators is the lack of qualifications and experience of key personnel. In addition, American Eagle is going through the same problem as other carriers in the industry with regard to hiring minimally qualified pilots. American Eagle is hiring pilots with so little flying time that they can barely meet pilot in command time for the Airline Transport Pilot (ATP) rating, a requirement for a pilot flying with an airline, when they upgrade. When considering all of these circumstances, it would seem obvious that American Eagle flight operations demands heightened FAA surveillance.

After two to three months of working on this project in addition to my other full-time assignments, I came up with several issues that placed regulatory compliance in question. Among other things, a review of the American Eagle Airlines SF-340 Aircraft Operating Manuals (AOM) revealed that

- Problems existed that already resulted in misinformation and confusion in the training of pilot crewmembers and could eventually result in operation failures
- Many parts of the AOM were not FAA approved in accordance with the national guidance
- American Eagle Airlines had stopped providing the FAA with certain information required under FAA Order 8900.1, the safety handbook for all FAA inspectors
- Some instructors, check airmen and examiners in the SF-340 program were teaching techniques for which there were no corresponding approved procedures in the AOM
- Training manuals were not formatted, accepted and approved in accordance with FAA orders

After completing my research, I drafted 11 letters detailing handbook compliance issues, procedural problems and training issues. The drafts were forwarded to the POI so he could put them in FAA letter format. The POI then forwarded the letters to the operations unit supervisor. In November 2007 and again in January 2008, I asked the unit supervisor about the status of the letters in the presence of the POI and assistant unit manager. On both occasions, the unit supervisor, who I have been told used to work for American Eagle Airline, responded that we cannot send all the letters to American Eagle as it "will overwhelm them." However, after details regarding this hearing were released, I was notified last week by the POI that the unit supervisor had told him to "get the letters out of the office."

Through the American Eagle Operations Unit, the FAA has oversight responsibility for an air carrier that by all rights should be under heightened surveillance. Due to the extended delay in sending out the letters, several of the compliance issues I discovered remain unaddressed or undocumented. Unit management has actually addressed one of the issues directly with the air carrier management in the face of an upcoming audit. I was forced to attempt to try to work around many of the issues, which not only damaged my credibility with the air carrier but also is not the best way to address situations so important to public safety.

As I previously stated, I worked for the FAA for over 31 years, but I retired at the end of last month. I would have worked longer but I could not do so under the conditions that currently prevail at the FAA. Inspectors in large air carrier offices are confined by all of these “get out of jail free” partnership programs and FAA management’s refusal to hold the airlines accountable. The most disturbing part of this situation is that aviation safety is being placed at such extreme risk. When we finally have another major accident, what will the FAA be able to say? The FAA’s mission of safety has been lost in the pursuit of making nice with the air carriers and satisfying quotas. In other words, the show has become more important than the mission. As an experienced FAA safety inspector, I believe nothing should ever be more important than the agency’s mission of safety.