



## **ATTACHMENT 41**

**AIRWORTHINESS GROUP CHAIRMAN'S FACTUAL REPORT**

**LAX-02-GA-201**

Thick



United States Department of the Interior

OFFICE OF THE SECRETARY

In reply refer to:

OFFICE OF AIRCRAFT SERVICES

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P.O. BOX 15428  
BOISE, IDAHO 83715-5428

February 26, 1993

MEMORANDUM

TO: DIRECTOR  
FROM: DEPUTY DIRECTOR  
SUBJECT: C-130A AIRTANKERS

On February 24, 1993 the following people discussed the C-130A airtanker issue in terms of determining the correct DOI course of action for C-130A employment in the FY 93 and future fire seasons.

- |  |                     |
|--|---------------------|
| Bob Peterson, OAS                            | *Doug Erskine, NPS  |
| Ben Campbell, OAS                            | *Roger Erb, FWS     |
| Jay Hess, OAS                                | *Jim Schneider, BIA |
| Mick McCurry, OAS                            | *Al Dutton, BLM     |
|  | Ron Hanks, BLM      |
| *Interior Fire Coordination Committee Member |                     |

The group was briefed on: 1) OAS concerns regarding C-130A Programmed Depot Maintenance (PDM) inspections and time change component maintenance requirements and 2) the Federal Aviation Administration's (FAA) multi-action fix to the problem as outlined in Kenny Rogers' (FAA) Briefing Papers dated February 11, 1993 and January 14, 1993 (copies attached).

Two options were discussed, along with the advantages and disadvantages associated with each option. They are:

1. Take no further action -- let FAA issue bulletin regarding PDM and Time Change (TC) items to the field.

Advantages

- ◆ Easy
- ◆ Agrees with USFS
- ◆ Could be least costly

Disadvantages

- ◆ Morally and legally untenable

2. Issue policy that no C-130A airtanker will be knowingly dispatched on DOI fires, pending compliance with new FAA directives pertaining to core PDM inspections and time change items.

Advantages

- ◆ Morally sound
- ◆ Provides legal protection
- ◆ May force a fix to inter-agency standards
- ◆ Keeps C-130A in the fleet
- ◆ Supports DOI position with FAA

Disadvantages

- ◆ Puts dispatchers in a difficult position
- ◆ May increase exposure to individual liability
- ◆ Puts DOI at odds with the concept of interagency interoperability
- ◆ Potential political involvement

The options were judged based on DOI management concerns involving:

- ◆ Contract payment liability
- ◆ Interagency standards
- ◆ Tort liability
- ◆ Interagency interpretation of common contract language
- ◆ Airtanker lobby group
- ◆ P3-P2V aircraft
- ◆ What can fire afford?

After a detailed review of each option, it was unanimously concluded that:

1. Adopting Option 2 is the most appropriate course of action, and

2. The C-130A airtanker issue should be elevated to the Secretaries of the Interior/Agriculture level to resolve the problems associated with "interagency standards."

Group consensus was for OAS to describe the Departmental policy required in Option 2 in a memo to affected Bureau Directors. Each bureau would issue implementing instructions appropriate to its organizational structure and procedures consistent with Departmental policy.

Director-OAS will discuss the interagency standards issue with Director of Program Services and the U.S. Forest Service.

Attachments

cc:  M. McCurry      D. Erskine  
       J. Hess            R. Erb  
       A. Dutton        J. Schneider  
       R. Hanks

*B. [Signature]*  
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