

# **ATTACHMENT 49**

# AIRWORTHINESS GROUP CHAIRMAN'S FACTUAL REPORT LAX-02-GA-201

# Reston Support Services, Inc.

PO Box 3532 • Reston, VA • 22090 • (7.13) 757 7970

August 23, 1933

MEMORANDUM FOR RON TESTA, ATSET GROUP, INC.

As we agreed, I attended the FAA-sponsored meeting on C-130A airworthiness at Dulles today. The meeting agenda is attached as enclosure (1) for reference. Following is a recap of the meeting in the order in which it actual occurred, with the pertinent points made by each presenter:

## Ed Freeman, FAA (AFS-510)

- The maintenance requirements for restricted category aircraft are no Less stringent than for unrestricted.
- FAR 91.409(f) outlines four separate inspection program options:
  - 1) 121, 135 continuous airworthiness inspection program.
  - 2) 135.419 Approved Aircraft Inspection Program (AAIP)
  - 3) Manufacturer recommended program.
  - 4) Any other program approved by the FAA.
- Options 1-3 are based on following a manufacturer's recommended program. It follows that any Option 4 program would also need to be based on manufacturer's recommendations or long-term operator experience.
- Currently there are a number of ex-military C-130As in a variety of civilian tries, but no standardized inspection program, and no continuing airworthiness program from Lockheed since C-130A policy was ceded to the Air Force in the 1950s.
- FAA held a meeting 6/14 with principal C-130A operator PMIs, Lockh∋ed 3AF, and tech advisors to develop a standard for inspections.
- FAA present concern is with scope of inspections, rather than the frequency. What is inspected is more important than how often. Focus is totally on inspections rather than maintenance or overhaul.
- Key recommendation of 6/14 meeting is to adopt USAF inspection cycle for timing, and USAF Program Depot Maintenance (PDM) standards as basis for individual inspection programs. Rationale for using USAF PDM is that it is thorough and complete program based on 30+ years of experience, data, and rend analysis. FAA will welcome any alternative suggestions proposed by or erators through the FAA admin chain.
- FAA is also examining L-382 Airworthiness Directives (ADs) for applicability to C-130A. Some ADs may have been incorporated by USAF as Time Compliance Technical Orders (TCTOs), but not certain. Most C-130As type certificated for restricted use between 1988-1990 with no TCTO incorporation since. FAA will examine TCTOs for applicability as ADs; may be simple or may be very complex to determine. Likewise, Allison ADs for the 501-D13 may be directly applicable to the T-56-9. Potential for major impact on operators since D13s operated with Limited Life Components (LLCs) that have identical part numbers with 1356

replace-on-failure parts. USAF did not convert to LLC-based maintenarice in array 1980s due to anticipated retirement of C-130As.

- Future Type Certifications for ex-military aircraft will have continuing airworthiness direction. Present problem lies in individual operators having developed their own inspection programs which FAA now deems inade quate
- Freeman Q& A
- O. What is driving this. Every C-130A user is currently operating uncertain FAA approved inspection program?
- A. Department of the Interior brought lack of consistency among opera ors to FAA attention. FAA looked at L-382 maintenance plan from Lockhe ad and determined it is applicable to C-130A. Safety is primary concern, even if the a haven't been any apparent problems. FAA's charter is to be proactive in preventing unsafe situations.
- O. The L-382 plans and procedures are based on operating a transport aircraft. Why should that apply to restricted use aerial tankers?
- A. FAA concern is continuing airworthiness and must take a corserval ve approach.
- O. Aren't USAF TCTOs based on combat readiness requirements and anticipated future use. Why should they apply to restricted use aircraft?
  - A. We'll look at that.
- O. If operator incorporates all TCTOs will be be able to use C-130As if a the USAF---i.e. carrying cargo and pax?
  - A. No. Aircraft will still be type certificated for a specific use.

#### Duane Powers, Hawkins & Powers Aviation

- Bottom line: H & P will be forced out of business if FAA proposals implemented.
- H & P operates a wide variety of ex-military aircraft, most only 100-200 hor s per year. Aircraft are operated below max gross at reduced power settings ge 13 ally operated and maintained in and non-corrosive atmosphere. In case of FB4Y + & P has far more experience in operating than the US government. These factors were all considered in the development of H & P's inspection plan. H & P does not play with fire, they put it out. FAA is playing with fire in that the net result will be to kill the aerial tanker industry for no good reason, and leave the US government; without the means to fight wild fires.

#### Powers Q & A

- Q. What will the dollar impact be to H & P.
- A. Can't say until FAA defines requirements, but even minimal requirements will be intolerable financially.

#### Bill Broadwell, Air Tanker Association.

- Association is concerned that this FAA initiative will be extended to all exmilitary aircraft.
- Implementation if required will affect operators differently, but restricted category aircraft can't be used for other purposes. Operators do not have a contact deal of flexibility, and there is concern that the industry will be badly hurt and that the US will lose a key resource.
- Why is the FAA so determined to fix something that isn't broken?

### Jim Peale, Warner Robins Air Logistics Center.

- USAF has 30 years of C-130 experience, as well as collecting info from form musers and Lockheed. USAF PDM program developed over time based on detail and analysis, not theoretical models. Different PDM interval for each C-130 model with 42 months established for the As.
- PDM can be accomplished by operators at home bases if they have the right equipment and training. Currently, operators are not accomplishing critical maintenance functions. Accident waiting to happen.
- USAF experience has been that structural damage due to corrosion and farique cracking more a function of time than flight hours. Do not recommend ordered ing the inspection cycle. TCTOs based on safety of flight considerations not compatible readiness or other factors. Should be incorporated in all aircraft.
- USAF can provide incorporation data for specific aircraft and general PDM information to FAA. Up to FAA to promulgate in the interests of air safety. USAF can't go direct to operators.

#### Peale Q & A.

- O. Civilian equivalent of PDM is D check. Don't D checks accomplished more often than 42 months obviate the need for PDM?
- A. No. Won't see some stress/corrosion until 42 months. Time by sed  $\alpha$ , long time analysis of lots of data.

#### Ray Frewer, Lockheed.

- Lockheed has no continuing responsibility or liability for C-130A. All turned over to the USAF as part of the initial C-130 program. Do publish bulletins as aware of problems.
- L-100 and C-130A very different aircraft. No valid comparison of mair tena 1 o programs.

#### Philip Akers, FAA (AIR-120).

- FAA policy not to go back and require retesting once type certificate has keen issued, but can correct design problems or safety defect with ADs. Try to take common sense approach, but bottom line direction from Congress is to require high standard of safety. Will work with the operators as much as possible but will impose TCTOs or other directives in the interest of air safety.
- C-130A will have to always operate in restricted category since not manufactured to FAA passenger carrying specs. FAR 25 compliance never evaluated.
- FAA currently looking at 18 structural ADs and 8 engine ADs for L-382 for applicability to C-130A. Also weighing TCTOs for incorporation.
- Will incorporate depot level maintenance TOs in future Type Certification calls sheets to preclude same problems in future.
- Concern that current Supplemental Type Certificates (STCs) for tankers do not contain direction on corrosion inspection of tail and fuselage sections affected by air drops or maintenance requirements for the tank doors.

### Dee McCombie, US Forestry Service.

• USFS current contract requires operators to comply with Faa directive; in effect at the time of the contract implementation. If FAA requires new inspection

program at \$350K to \$1M per aircraft, USFS can't underwrite the additional cost.

- If C-130As are a problem, what about P-3s and any other ex-military platicans?
- Worst case FAA implementation will require USFS to not exercise current contract option years, but to develop a whole new contract in the spring of 1994.

#### Open Forum.

- Operators are encouraged and invited to be part of the decision process. PAA needs the operators' input to be able to judge impact properly.
- FAA will not do anything that will preclude current operations. Will rot shut down operators for PDM. Will initiate a reasonable phased compliance timetable, but probably not require it during the life of the current contract.
- Most operators have considerable investment in C-130A conversion that the rwould have to absorb if they could no longer operate the aircraft. Would put them out of business.
- Operators' consensus is that they would delay implementation of PDM requirements for as long as possible, and then retire the C-130As without complying.
- USFS position is that current programs appear adequate. Rather than apply new requirements in bits and pieces, FAA should apply new standards to all aircraft across the entire industry.
- If the FAA can cause this to happen to the tanker operators, there will lite ally be no end to the amount of intrusive "help" the industry will suffer in the future.

#### Freeman Summary of the meeting.

- There is no FAA desire or intent to kill the industry. Only motivation is reasonable approach to appropriate maintenance and safety.
- FAA allows operators a fair amount of leeway in developing their own maintenance programs, and operators have not responded adequately.
- FAA has heard the operators and is not unmoved by their situation. Next st p will be FAA decision on whether or not to implement PDM requirements.
- Decision will be made in the next 60 days and operators informed by regis ared letter of new requirements. Operators will have 30 days to appeal new processures in accordance with FAR 91.415. Expect operators to exercise every avenue to address concerns.
- FAA does not anticipate need for emergency ADs even if full implementation is the required.

#### Personal Observations:

Looks to me as if the FAA has been put in a box here by the Interior Department instigating this investigation of the tanker operators' maintenance practices. The FAA has been publicly embarrassed by their own lack of attention to this detail, and having it pointed out by another agency. They are in the position of having to do something quickly to regain control of what is their own bread and butter program—flight safety.

Despite his public statements that nothing has been decided and that he wan's the operators' input, in a sidebar conversation Freeman indicated that he believes

in the PDM concept and thinks it is the safest course of action. Anticipate that he will press for its adoption.

Freeman also indicated that the focus of his shop is on multi-engine turk opropaircraft, and that he will look at P-3s "soon". He said that the same rationale to hald be applied, i.e.—if there was a body of maintenance data and a history of depart level procedures and practices based upon the analysis of trends, that he would anticipate extending those procedures to the P-3 operators as requirements, just as with the C-130 TCTOs. Although he is a rated Electra FE, his knowledge of the P-3 program is very limited at the moment.

A. L. Rous