

Notation 8316B

Member Sumwalt, Concurring

I believe this accident brief and probable cause statement accurately describes the circumstances of this accident, and I therefore support the product. However, in carefully reviewing the entire docket for this accident, I discovered things that -- although perhaps not directly relevant to the cause of this accident -- are of great concern to me.

Although safety was stated as a top priority for Quest Diagnostics, their practices seem to indicate otherwise. Specifically, throughout the interview summaries, whether with current or former employees, there was a persistent theme of “get the job done at all costs” and pushing to complete the mission.

One pilot was reportedly chastised for not being able to land at Washington Dulles International Airport due to low weather. The safety officer for Quest acknowledged that the Director of National Air Logistics would call out pilots for missing approaches, and pressured pilots to “take a look” to see if they could land.

In October 2009, an aircraft engine manufacturer discovered a critical safety-of-flight issue with some engines operated by Quest. In a highly unusual move, the engine manufacturer’s guidance was to “ground all affected airplanes immediately.” Instead of requiring one of those airplanes to land immediately, Quest’s Director of National Air Logistics instructed the pilot to continue for an additional two hours so that the aircraft could land at a Quest maintenance facility. According to the interview summary of Quest’s Director of National Air Logistics, he thought that continuing the flight would be an acceptable risk. His justification was shocking: in the worst case, if the affected engine should blow up, the pilot could continue on the good engine.

One measure of an organization’s safety culture is whether or not employees are willing to report to management safety concerns, events, near-misses, and errors. According to the interview summary of Quest’s safety officer, Quest pilots did not perceive a constructive attitude within management regarding such reporting, and thus, would not submit safety reports. Further, in Quest’s submission to NTSB, it attempted to show its commitment to safety by having an independent safety “hot line.” It stated, “Over the past three years, there have been no calls to the hot line related in any respect to aviation safety.” I find it highly incredible that an aviation operation that conducts 28,000 flights per year could operate for three years without encountering any reportable safety events. Yet, sadly, Quest seems to believe that this lack of reports is a positive indication of safety. To the contrary – what it likely indicates is a serious lack of trust from employees. Instead of Quest demonstrating its commitment to safety, I believe this lack of reporting vividly illustrates it is missing a vital component of a safety culture.

My belief is further bolstered by one Quest pilot indicating that an open door policy exists on paper, but once someone expresses safety concerns, they are targeted for harassment. Another interview was summarized as saying that most Quest pilots are afraid to say anything or speak up, and they are in constant fear for their jobs. Further, an NTSB interview with the assistant chief pilot for Quest discussed a flight where he was flying and reportedly on duty for 35 hours with only 3.5 hours of sleep between duty periods. Asked why he did not contest such a fatiguing

schedule, he replied: “Why would I do that? I have a mortgage payment. I have a job, and if I don’t do this, I don’t have a job anymore.”

In their submission to NTSB, Quest dismissed these comments as statements from disgruntled former employees. Perhaps some of that may be the case, but the opinion I have formed is on the basis of reading all interviews – including that of the company’s assistant chief pilot and safety officer.

Denial is the enemy of change.

It is my hope that this statement will send a powerful message to the senior management of Quest Diagnostics: instead of denying these issues, the aviation department needs significant change or more accidents will occur.

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Robert L. Sumwalt, III