

**EMERY WORLDWIDE AIRLINES**

**RESPONSE TO**

**EXHIBIT 17Q**

EWA'S RESPONSE TO  
LETTERS DATED:

April 4, 2000

EWA RESPONSE TO  
17 Q

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U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

March 27, 2000

Flight Standards District Office  
4240 Airport Road  
Cincinnati, Ohio 45226

Mr. Tom Wood  
Director of Quality Control  
One Emery Plaza  
Dayton International Airport  
Vandalia, Ohio 45377

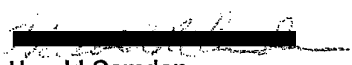
Dear Mr. Wood,

On March 23, 2000, Inspector Les Korody, Jim Franklin, and I met with you and discussed a number of observations and topics that are important to the success of Emery Worldwide's Airlines Operation. We also agreed on certain changes needed to assure continued training in areas of Loading, Hazardous Materials Awareness, and Maintenance Training. The following are area's we discussed:

1. Training Material used in the Recurrent Training of Stores personnel was not EWA reviewed and accepted. All training will now be EWA reviewed and accepted.
2. Syllabuses requested were actually Course Outlines. New Syllabuses will be developed and implanted for all courses used in training in the near future.
3. All new training conducted by the Training Department will be presented to the FAA for review prior to implementation.
4. The current Recurrent Loading Training Program was to be implemented immediately after the FAA reviewed of the course.
5. All new hired personnel will be given a Initial Training Program on Aircraft Loading.
6. The use of NON-MEL items will be addressed, and a list of such items will be developed as a guide for it use.
7. The use of Emery Worldwide Load Planning Sheets for Loading Emery Worldwide Aircraft during the loading phase is the only approved sheet.
8. Additional information regarding the Incident of Flt. #331, dated 3-16-00 is needed.
9. The records review of N997GE is rescheduled for Tuesday, March 28, 2000, regarding the AD notes summary and Equipment List.

If you have any questions, please call me at [REDACTED] A follow-up meeting will be scheduled.

Sincerely,

  
[REDACTED]  
Harold Camden  
Principal Maintenance Inspector

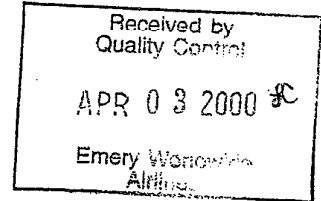


U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Flight Standards District Office  
4240 Airport Road  
Cincinnati, Ohio 45226  
[REDACTED]

March 28, 2000

Mr. Tom Wood  
Director of Quality Control  
One Emery Plaza  
Dayton International Airport  
Vandalia, Ohio 45377



Dear Mr. Wood,

On March 27, 2000, Inspector Jim Franklin and I met with you and discussed the items listed below and agreed on other related issues referenced in our letter of March 27.

1. Discussed the Non-Mel use in will review proposed procedure change to its use in the next manual revision.
2. Was advised of the new AD Note subscription service that will be implemented in in AD research for all Emery aircraft.
3. Was advised on 4 new employees in the Training Department, 2 systems instructors and one Tech. Writer and one Graphic Illustrator.
4. Was advised on 2 new "B" Service Inspectors will be in place shortly after April 10.
5. Discussed the Equipment Lists for all Emery aircraft and was told that new equipment lists were being developed, and that the original factory equipment list would be available for review.
6. Advised that a letter will be sent to this office indicating that all DC-8 aircraft will be equipped with tie-down fixtures to secure aircraft tires when carried as part of the SPK.

If you have any questions about the items discussed above, please call me at [REDACTED]  
[REDACTED] A follow-up meeting will be scheduled.

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector



March 31, 2000

Mr. Harold Camden  
Emery Worldwide Airlines PMI  
4240 Airport Road  
Cincinnati, OH 45226

Dear Mr. Camden:

This letter is in response to Mr. Jim Franklin's letter dated March 3, 2000, received March 8, 2000, and a formal follow-up to our meeting here at Dayton on Monday, March 27, 2000 with Jim Franklin, Edward Jones, yourself and I.

Per Mr. Franklin's letter and our discussion, you have made recommendations regarding how Emery Worldwide Airlines (EWA) presents Airworthiness Directives (ADs) to you for your records review, specifically addressed by your past reviews of aircraft N997GE.

EWA's Maintenance Policy and Procedures Manual (MPP) contain procedures for the compliance of FAR 121.380, "Maintenance Recording Requirements", and specifically address the AD requirement of 121.380,2,vi," the current status of applicable directives, including the date and methods of compliance, and if the airworthiness directive involve recurring action, the time and date when the next action is required".

I have attached the applicable sections of the MPP that address these specific procedures:

1. Chapter 4, Section 1X - Airworthiness Directive Compliance Policy and Procedure FAR 39.
2. Chapter 6, Section 11 - Aircraft Retention Policy & Procedure, specifically item B.4 - Airworthiness Directive Compliance, FAR 121.380.
3. Chapter 6, Section IV. - ADs and Time Control Policy and Procedure, FAR 121.380.

EWA's AD status procedure is in full compliance of FAR 121.380, 2, vi.

In the spirit of being proactive, we have advised you that we are developing a single document process per your recommendation of which all applicable ADs compliance status can be determined. Per your conversation with Edward Jones, Manager Quality Control, this will be complete for aircraft N997GE on Tuesday, April 4, 2000.

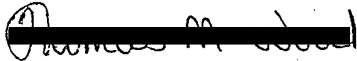
The following items were requested for discussion in Mr. Franklin's letter (letter attached).

EWA Response:

1. This recommendation has been addressed in the previous paragraph. EWA will also complete this AD listing on the fleet in a reasonable time.
2. The Douglas Weight & Balance Manual with the equipment list published during the manufacturing process is available for your review.
3. EWA utilizes the FAA AD listing as a single source (see attachment).

I trust this letter will provide you the follow-up you requested in addressing your recommendations.

Sincerely,

A handwritten signature in black ink, which appears to read "Thomas M. Wood". The signature is written over a thick black horizontal redaction bar.

*Thomas M. Wood*  
*Senior Director Quality Control/Assurance*

TMW/bl

Enclosures

cc: René P. Visscher  
Edward Jones  
Abraham Michael

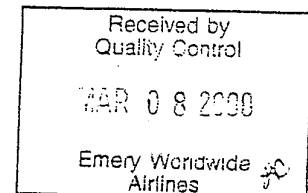


U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Flight Standards District Office  
4240 Airport Road  
Cincinnati, Ohio 45226  
[REDACTED]

March 3, 2000

Mr. Tom Wood  
Director of Quality Control  
One Emery Plaza  
Dayton International Airport  
Vandalia, Ohio 45377



Dear Mr. Wood,

During the week of March 3, 2000, Inspector Les Korody, Inspector Larry Sheaffer, and myself conducted a records review of N997GE. This process took up much of the records department's time in research and delivery of N997GE's documents. In some cases, some records were non-existent, incomplete, and not delivered in a acceptable time frame.

At the end of the review, we met with you and discussed these issues and we agreed to work together and come up with a plan, a process, and procedures for records review. This will enable us to review records in a timely manner without occupying the personnel in the records department for hours on end.

The following are issues that we discussed and that need addressing;

1. A single document process of which all Applicable Airworthiness Directives Status compliance can be determined.
2. All records such as Aircraft Equipment Lists or any other related document will be available when requested.
3. One defined source for research of Airworthiness Directives Compliance of Emery Aircraft.

Please respond to the above issues within 30 days of receiving this letter and we will set up a meeting to address the above items.

Sincerely,

[REDACTED SIGNATURE]

Jim Franklin  
Assistant Principal Maintenance Inspector

## EMERY WORLDWIDE AIRLINES MAINTENANCE POLICY & PROCEDURES MANUAL

### IX. AIRWORTHINESS DIRECTIVE COMPLIANCE POLICY AND PROCEDURES FAR 39

#### A. Policy

Airworthiness Directives will be reviewed by the Engineering and Quality Control Departments to determine the applicability of the AD to company equipment and the action to be taken for compliance. Quality Assurance and Engineering will initiate necessary action by providing specific instructions to Maintenance Records, by notifying the Maintenance Department of immediate action requirements, and if the procurement of parts is involved, coordinate with Purchasing. If modification of parts or equipment is involved, Engineering will issue a Engineering Order (EO), as necessary, to comply with the directives.

EMERY WORLDWIDE AIRLINES will not operate a product to which an airworthiness directive applies, except in accordance with the requirements of that airworthiness directive.

#### B. Procedure

1. All AD notes applicable to company aircraft and equipment will be listed on a master AD list.
2. Maintenance Records will prepare individual aircraft listings for each Airworthiness Directive applicable to the type equipment operated by the Company and add each to the Aircraft AD listing. Necessary paper work to comply with the AD will be prepared and issued.
3. The Maintenance and Inspection Departments or contract agency will comply with instructions from the Quality Control Department for compliance with immediate action AD's and with instructions from Maintenance Records as entered on the Discrepancy Sheets.
4. The mechanic or inspector complying with the specific instructions prepared by Quality Control shall make a statement in the form of the example below when signing-off an AD.

EX: AD 73-01-01 Amendment 2-265 Paragraph C.1, complied with in accordance with DACO S/B 27-22 (or EMERY WORLDWIDE AIRLINES EO number) paragraphs 1-3 by eddy current inspection. No defects noted.

<b>Note:</b> The certificated individual signing-off the AD <b>MUST ALWAYS</b> state whether defects were noted or not and the method of compliance!
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## EMERY WORLDWIDE AIRLINES MAINTENANCE POLICY & PROCEDURES MANUAL

5. Upon compliance with the AD, if it is a one time only inspection, the proper information will be entered in the AD Compliance List. If the AD requires repetitive inspection, the AD compliance information will continue to be maintained on the AD Compliance List, and the AD will be entered on the EMERY WORLDWIDE AIRLINES Aircraft Maintenance Forecast as well. The forecast will insure proper monitoring of the next due date for repetitive inspection.

Repetitive AD's with an inspection interval compatible with existing check periods may be incorporated into the appropriate check package (A, B, C, or D check) by the Quality Control Department. The AD number will be referenced in the summary of tasks completed within the inspection.

6. Quality Assurance will review all completed ADs for completeness. Terminated ADs will be filed in the applicable aircraft Terminated AD Manual. Repetitive ADs will be filed in the aircraft records repetitive file.
7. See Chapter 3, "Maintenance Control Work Request Form Procedure" for additional procedure on log page entries when performing A.D.'s.
8. See Chapter 6, "ADs and Time Control Policy and Procedure" for additional procedure control.

# EMERY WORLDWIDE AIRLINES MAINTENANCE POLICY & PROCEDURES MANUAL

## II. AIRCRAFT RECORDS RETENTION POLICY AND PROCEDURES FAR 121.380 and 121.380a

### A. Policy

All records of maintenance, preventive maintenance, alterations, repairs, Airworthiness Directive compliance and flight and maintenance log books will be retained as set forth herein.

### B. Procedure

EMERY WORLDWIDE AIRLINES will make all required maintenance records, to be kept by the Aircraft Records Section, available for inspection by the FAA or an authorized representative of the NTSB. Making available does not necessarily constitute performing research functions. Any research requested will be directed to the Director of Quality Control or his designee.

#### 1. Aircraft Maintenance Logs, Airworthiness Release Records, DMI-MEL Records/Non-Routines.

The Aircraft Maintenance Log (log page), and any other documentation that supports an Airworthiness Release, including DMI/MEL records, will be retained for a one (1) year period. If the Log Page/Non-Routine contains the sole sign-off for an AD, it will be retained permanently if the AD is terminated or until re-complied with if the AD is repetitive.

If after twenty (20) days, following the Aircraft Maintenance Log page date, the original "white" Aircraft Maintenance Log page has not been received by Aircraft Records and all reasonable efforts have been expended to retrieve it, then the Aircraft Maintenance Log page "pink" carbonless reproduction (NCR), will be authenticated by Quality Control and be retained by Aircraft Records as an official substitute for the original "white" Aircraft Maintenance Log page.

#### 2. Component/Part Tags (maintenance release)

- a. Hard Time Component/Part Tags for new/overhaul/hydrostatic test will be retained until next overhaul/hydrostatic test or the component/part is disposed of.
- b. Non hard time rotatable Component/Part Tags will be retained until the component/part is superseded (removed and replaced) or unit is disposed of.

#### 3. Master Log, Airframe Limit Report, AD Compliance Record, and Major Alteration Listing

The EMERY WORLDWIDE AIRLINES reports listed under this heading, meet the requirements of FAR 121.380a (2)(i) through (vii) (SEE NEXT PAGE FOR FURTHER CLARIFICATION REGARDING AD'S).

## EMERY WORLDWIDE AIRLINES MAINTENANCE POLICY & PROCEDURES MANUAL

### 4. Airworthiness Directive Compliance

There are two (2) documents pertaining to AD's: the repetitive inspection documents and the terminated AD Records. The repetitive inspection documents will be retained until the inspection is re-complied with. The terminated AD Records showing the current status of the AD, including the method of compliance, date of compliance, and who performed the work will be permanently retained and transferred with the aircraft at the time it is sold or the termination of the lease.

### 5. Overhaul Records for Hard Time Components/Parts

The records of the last complete overhaul of each airframe, engine, component/part, and appliance shall be retained until the work is superseded by work of equivalent scope and detail, or the aircraft, engine or component/part is no longer in EMERY WORLDWIDE AIRLINES Inventory.

**Note:** Components/parts repaired and continued time will require record retention until complete overhaul is performed.

### 6. Teardown and Repair Reports

The component/part teardown and/or repair reports from vendors, will be reviewed for continuing analysis and surveillance data and kept on file for a period of one (1) year, or until overhauled, or the component/part is no longer in EMERY WORLDWIDE AIRLINES inventory.

### 7. Vendor/Repair Station/Shop Work Orders for hard time components/parts will be retained until the next overhaul of the component/part.

### 8. Inspections

There are two (2) documents pertaining to aircraft inspections: the actual sign-off document and the inspection record (EMERY WORLDWIDE AIRLINES Airframe Limit Report). The actual sign-off document may be discarded upon re-compliance of the inspection, the inspection is superseded by a higher inspection, or one (1) year has elapsed after the work was performed. The sign-off document includes, but is not limited to: Routine Inspection Cards (including SID related inspections), Routine Check Cards (Service, A, B, C, D, etc.), Non-Scheduled Inspections (overweight landing, etc.).

The Inspection Record (EWA Airframe Limit Report) contains the information required by FAR 121.380 (a)(2)(v) as referenced in this section.

# EMERY WORLDWIDE AIRLINES MAINTENANCE POLICY & PROCEDURES MANUAL

## IV. ADs AND TIME CONTROL POLICY AND PROCEDURE

FAR 121.380

### A. Policy

A complete Time Control File System for all accessories and components, as required by the Operations Specifications shown in the Maintenance Operations Specification Manual is kept by Aircraft Records. An EMERY WORLDWIDE AIRLINES Part Change Tag (Serviceable Tags) or contract air carrier's Serviceable Tag must be kept on file for each of these items current on the aircraft.

1. In addition, files are maintained on some emergency equipment items that cannot be readily maintained by the inspection requirements of the various aircraft service forms. Serviceable tags are not required for these items as the file alone controls the inspection of the item in accordance with the Operations Specifications. An EMERY WORLDWIDE AIRLINES emergency equipment tag is used on these items where applicable.
2. All other emergency equipment items have inspection requirements in the aircraft services that adequately control the time limitations of the Operations Specifications. An EMERY WORLDWIDE AIRLINES emergency equipment tag is used on all of this equipment.

### B. Procedure

1. Aircraft Records will provide on a monthly basis, an "Aircraft Maintenance Inspection Forecast."

The forecast consists of:

- a. Inspection Program
- b. Repetitive Airworthiness Directives
  - (1) Airframe
  - (2) Power Plant
- c. Time Controlled Components
- d. JT3D/CFM 56 Engine Limiter Forecast

It is the responsibility of Production Planning to inform the Maintenance and Inspection Departments when the aircraft and/or Power Plant and their respective accessories and/or components are due for either inspection, time removal, AD note compliance, aircraft weighing, etc.

## EMERY WORLDWIDE AIRLINES MAINTENANCE POLICY & PROCEDURES MANUAL

2. Prior to each major service, all applicable records will be checked to see which special checks, services, time changes, etc., must be complied with prior to the next regularly scheduled major service. These items are recorded on the Aircraft Maintenance Inspection Forecast (see page 10, this chapter).

When the completed paperwork returns to the Aircraft Records Section that shows satisfactory compliance of the required time change, inspection, etc., proper entries will be made to the applicable file and the paperwork properly filed. Quality Control will perform audits of all paperwork received, prior to filing in the aircraft records.

3. EMERY WORLDWIDE AIRLINES current method of maintaining the a) total time in service of the airframe, b) the current status of life-limited parts of each airframe, engine and appliance, c) the time since last overhaul of all items installed on the aircraft which are required to be overhauled on a specified time basis, d) the identification of the current inspection status of the aircraft, including the times since the last inspections required by the inspection program under which the aircraft and its appliances are maintained, and e) the current status of applicable Airworthiness Directives, including the method of compliance is by automated means.

The following reports either in combination or stand-alone will provide the audit trails back to original paperwork or vendor references necessary to maintain the information required by a Continuing Analysis and Surveillance program as well as the requirements of FAR 121.380 as stated in the previous paragraphs.

### Emery Worldwide Airlines Aircraft Maintenance Inspection

ATA Chapter  
Nomenclature  
Part number or Inspection Identifier/AD number (for repetitive AD's)  
Serial Number  
Position  
Inspection Interval  
Aircraft Time at installation  
Due date  
Time Remaining  
Days remaining  
Time since Overhaul  
Due Date forecast on current utilization

# EMERY WORLDWIDE AIRLINES MAINTENANCE POLICY & PROCEDURES MANUAL

## Part List

Date of installation  
ATA chapter  
Part number  
Nomenclature  
Serial number on  
Serial number off  
Pos  
Vendor

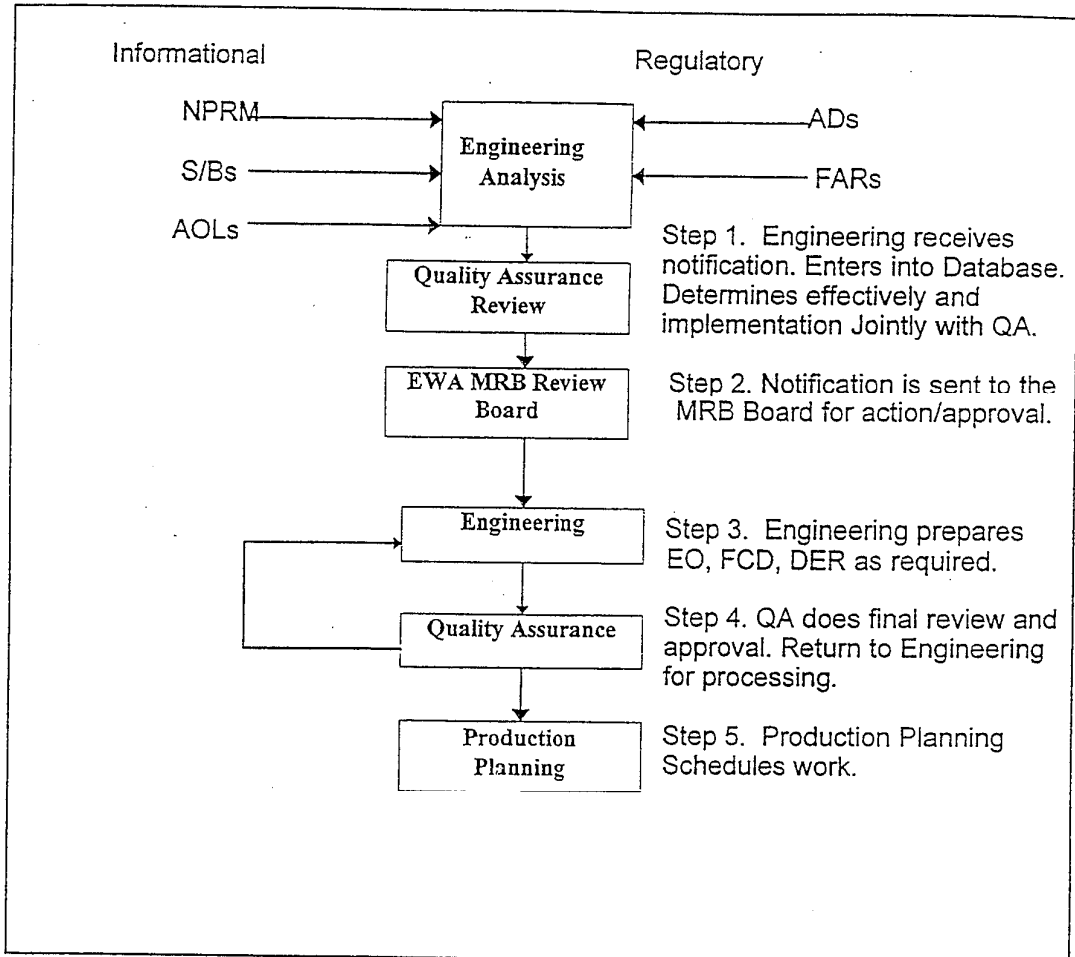
## AD Compliance Record

Aircraft or engine  
AD number and amendment number  
Description of AD  
Method of compliance  
Date of compliance  
Name of individual/repair agency performing compliance work

4. The Engineering Department and the Manager of Quality Assurance will research and review all newly released ADs, Alert Service Bulletins, and other mandatory documents for their applicabilities to the EWA operated aircraft and power plants and to integrate same into the maintenance program by EO or other designated M.P.P. procedure. All applicable revisions, additions or deletions to the maintenance program will be transmitted to the Manager of Aircraft Records and Manager of Production Planning by means of "Maintenance Review Transmittal Sheet (MEO78)".

This procedure is shown by a flow chart to reflect the process steps that involve several sections of the Technical Services Department.

# EMERY WORLDWIDE AIRLINES MAINTENANCE POLICY & PROCEDURES MANUAL

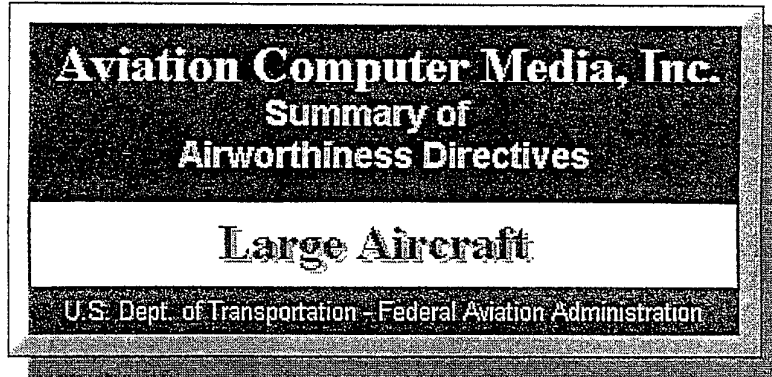


## C. Airframe Limit Report Open Status Procedure

1. The Aircraft Record Section will maintain a monthly fleet Airframe Limit Report open status. All updates to the Maintenance Transaction File will be noted on the report by a pen and ink change.
2. At the end of each month, a designated records person will check the pen and ink changes against the hard copy file paperwork/log pages to verify the task performed, date, hours, cycles etc.
3. At the completion of the Records file verification, the reports will be forwarded to Quality Control. A Quality Control Inspector will perform a sample audit of the updates. At the completion of this audit, the reports will be discarded.

**AIRWORTHINESS DIRECTIVE COMPLIANCE LIST**

Name:		N:					
		Ser.No.:					
AD NO. & Rev. Date	Subject	Date & Hours at Compliance	Method of Compliance	One-time	Recurring	Next Comp. Due Date	Auth. Sig. and Number



Last Bi-Weekly Update: 2000-05 March 22, 2000

- [What's New](#)
- [Go to Index](#)
- [Search AD Text](#)
- [Bulletin Board](#) (1)
- [How to do a Search...](#)

\* You have scrolled past the last selectable item. Please press PgUp until the start-up screen is visible.

**HOW TO DO A SEARCH**

In order to do a complete and accurate AD Search for any aircraft, ACM recommends the following:

Print out the **AD Search Information Form** and fill in the appropriate information from aircraft records and/or log books. NOTE: is for print out only – it cannot be typed into on the screen. (FAA recommends consulting the type certificate for that aircraft before beginning an AD search).





**AIRWORTHINESS DIRECTIVE COMPLIANCE LIST**

Name:		N:	
		Ser.No.:	
AD NO. & Rev. Date	Subject	Date & Hours at Compliance	Method of Compliance
			One- [Rec- [Next Compl] Auth. Sig. and Number Time [urring]Due Date

**CFM INTERNATIONAL**

**CFM56-2 E2GL**

84-26-03							
89-23-06 R1	No. 3 bearing failure						
96-18-16	LCF failure of LPTR						
98-07-02	HPCR stage 1-2 spool						
98-12-32	HPTR disks						
99-08-16	ESM Time Limits Section revision						

**CFM56-2A**

96-18-16	LCF failure of LPTR						
98-12-32	HPTR disks						
99-08-16	ESM Time Limits Section revision						

**CFM56-2B**

96-18-16	LCF failure of LPTR						
98-12-32	HPTR disks						
99-08-16	ESM Time Limits Section revision						

**CFM56-3 E2GL**

86-08-05 R1							
89-23-06 R1	No. 3 bearing failure						
89-13-51	Superseded by 96-25-11						
90-20-13							
91-02-10							
96-18-16	LCF failure of LPTR						
96-25-11	Fan blade failure						
97-08-01	LCF fan disk failure						
T97-25-51	Superseded by 98-10-11						
98-07-02	HPCR stage 1-2 spool						
98-10-11	AGB gearshaft failure						
98-12-32	HPTR disks						
98-19-10	(AGB) starter gearshatt						
99-08-16	ESM Time Limits Section revision						

**CFM56-3B**

89-23-06 R1	No. 3 bearing failure						
96-18-16	LCF failure of LPTR						



April 18, 2000

Jim Franklin  
Assistant Principal Maintenance Insp.  
Flight Standards District Office  
4240 Airport Road  
Cincinnati, OH 45226

Dear Mr. Franklin:

This letter is in response to your letter dated March 2, 2000 Subject: Aircraft Records Package Request. I believe Mr. Camden made a request that EWA provide your office with an Aircraft Conformity document 2 weeks prior to the date at which EWA would like to place and aircraft on certificate. I have reviewed the checklist provided by you and I noted that some of the data will not be available 2 weeks prior per Mr. Camden's request. These items include:

- Listing of all time limited items and when due.
- Copy of current weight and balance.
- Listing of currently installed equipment include (Item, P/N, Model #, Description).
- Complete AD's list with method of compliance

The final data to support the above items will be delivered with the aircraft and be available upon the aircraft's arrival. With your concurrence I will provide the data in a Conformity Book to your office 2 weeks in advance per your request with the most recent data available. Upon aircraft arrival in Dayton the remaining information will be made available to you for review to complete the conformity.

Bruce A. Robbins

A handwritten signature in black ink, appearing to read "Bruce A. Robbins".

Director of Engineering  
Emery Worldwide Airlines

Cc: Rene Visscher  
Thomas Wood



U. S. Department  
of Transportation

Federal Aviation  
Administration

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226

April 20, 2000

Mr. Bruce Robbins  
Director of Engineering  
Emery Worldwide Airlines  
One Emery Plaza  
Dayton International Airport  
Dayton, Ohio 45414

Dear Mr. Robbins,

SUBJECT: Aircraft Records Package Request

This letter is in response to your letter dated April 18, 2000, Subject: Aircraft Records Package Request. Mr. Camden made a request that EWA provide this office with an Aircraft Conformity document 2 weeks prior to the date at which EWA would like to place the aircraft on certificate. This time is necessary for this office to review and determine the aircraft airworthiness status.

Your letter lists four areas you have concerns with as to whether these records will be up to date. It is EWA's responsibility to insure this aircraft is in an airworthy condition at time of flight. The Airworthiness Certificate is effective as long as the maintenance, preventative maintenance and alterations are performed in accordance with Part 21, 43 and 91 of the Federal Aviation Regulations as appropriate.

If you have any questions, please call me here at the office at [REDACTED]

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**Flight Standards District Office  
4240 Airport Road  
Cincinnati, Ohio 45226**

April 26, 2000

**Mr. Edward Jones  
Manager of Quality Control  
One Emery Plaza  
Dayton International Airport  
Vandalia, Ohio 45377**

Dear Mr. Jones,

In response to the records research that has been completed for N997GE, I have reviewed these records and accepted them for content. There will be an additional review for accuracy in the future.

If you have any questions, please call me at [REDACTED]

Sincerely,

[REDACTED]  
**Harold R. Camden  
Principal Maintenance Inspector**



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

CC: Tom Wood  
  
Flight Standards District Office  
4240 Airport Road  
Cincinnati, Ohio 45226  
[REDACTED]

May 10, 2000

**Mr. Kent Scott**  
Emery Worldwide Airlines  
President & Chief Operating Officer  
One Emery Plaza  
Dayton International Airport  
Dayton, Ohio 45414

**Subject: RASIP Finding 2.10.2**

Dear Mr. Scott,

In response to the RASIP Finding 2.10.2, regarding the compliance of Airworthiness Directive AD 93-20-02, it has been determined that Emery Worldwide Airlines has been in compliance as follows. Your letter dated May 1, 2000, from the Associate Manager ACE-117A, Atlanta Aircraft Certification Office indicates that Emery has been in compliance as no AMOC is required for AD 93-20-02. We do not consider this a finding and consider this issue closed.

If you have any questions, please call us at [REDACTED]

Sincerely,

A handwritten signature in cursive script, which appears to read "Harold R. Camden". The signature is written over a horizontal line that has been partially redacted with a black box.

**Harold R. Camden**  
Principal Maintenance Inspector



U. S. Department  
of Transportation

Federal Aviation  
Administration

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226

CC: Tomk Wood

May 10, 2000

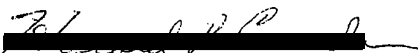
Mr. Kent Scott  
President and Chief Operating Officer  
Emery Worldwide Airlines, Inc.  
One Emery Plaza  
Dayton International Airport  
Dayton, Ohio 45414

Dear Mr. Scott,

In response to the RASIP Finding 2.10.5 regarding the compliance of Airworthiness Directive 94-06-10, after reviewing Emery Maintenance Service Letter, and a letter from Allied Signal it has been determined that Emery Worldwide Airlines has been in compliance with the referenced AD. We do not consider this a finding and consider this issue closed.

If you have any questions, please call us at [REDACTED]

Sincerely,

  
[REDACTED]  
Harold R. Camden  
Principal Maintenance Inspector

HRC:lms



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Great Lakes Region  
Flight Standards Division

2300 E. Devon Avenue  
Des Plaines, IL 60018

**SEP 26 2000**

Mr. Thomas M. Wood  
Senior Director, Quality Control  
Emery Worldwide Airlines  
One Emery Plaza  
Vandalia, OH 45377

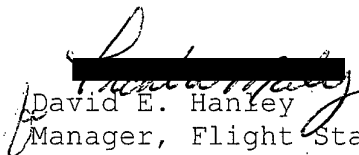
Dear Mr. Wood:

Freedom of Information Act (FOIA) Request  
Document Control No. 2000-008367GL  
Re: Request for results of 8/7-11/00 aircraft  
records audit conducted at Dayton, Ohio, for  
Emery Worldwide Airlines

In response to your Freedom of Information Act (FOIA)  
request dated August 31, 2000, we are enclosing the above  
referenced document, consisting of 1 page.

Under Part 7 of the Department of Transportation  
Regulations, there is no charge for this document.

Sincerely,

  
David E. Hanley  
Manager, Flight Standards  
Division, AGL-200

Enclosure

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Lotus cc:Mail for Larry McDermott

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Author: Robert G Brandt at AGL200MKE

Date: 8/21/2000 10:13 AM

Normal

TO: Larry McDermott at AGL200

Subject: RXXA Aircraft Records

----- Message Contents

Larry:

A separate copy for you.

Bob

---

Forward Header

---

Subject: RXXA Aircraft Records

Author: Robert G Brandt at AGL200MKE

Date: 08/21/2000 10:08 AM

Tom:

As directed during the week of August 7-11, 2000, a team of three (3) Inspector's reviewed Emery Airline Inc., DC-8 aircraft series 60 and 70 aircraft records for A.D. and life limited parts compliance.

The team reviewed the records of ten (10) aircraft and then verified the records by inspecting various active aircraft on the flight line for conformance to the AD's. The flight line aircraft conformance inspections included cargo doors, lavatories and windshear modification.

The company with the assistance of hired consultants had researched and assembled the entire DC-8 fleet of AD's and life limited parts list and files.

We found the aircraft records to be in compliance. The company and the CHDO personnel were very cooperative and assisted the team when requested.

Bob Brandt  
Team Leader



EWA's RESPONSE TO  
LETTER DATED  
July 10, 2000



April 20, 2000

Mr. Bob Groszer  
Manager FSDO  
4240 Airport Rd.  
Cincinnati, OH 45226

Dear Mr. Groszer:

This letter is a formal follow-up to our telephone conversation on April 18<sup>th</sup>, 2000, regarding our assigned responsibilities with regards to the FAA Priority List of Current Airworthiness/Operations Issues. I also discussed these items today, April 20, 2000, with Harold Camden and Les Korody.

Emery Worldwide Airlines (EWA) is pleased to provide you this status update of the listed items:

1) **RECORDS:**

Method of record keeping and retrieval of airworthiness directives, life limited components, and weight & balance (including equipment list) needs to be improved.

EWA Response:

- a) The records items were addressed in the RASIP responses to 2.5.4. EWA provided the CVG Principals improvements to the Maintenance Manuals procedures.
- b) The Airworthiness Directive items of the RASIP was responded to in 2.10.3 and 2.10.4. EWA provided an improvement by developing a single computerized EWA Airworthiness Directive Listing for each aircraft.
- c) The weight & balance items of the RASIP was responded to in 2.9.1 thru 2.9.4. EWA provided an improvement to the Weight & Balance Manual that includes the new development of an EWA Equipment List.

Summary

EWA is working in concert with the FAA CVG Principals in performing identified manual reviews and will take immediate steps as previously represented to make revisions to improve the procedures.

An EWA Quality Program has been implemented since May 1, 2000 to perform the following tasks on the EWA fleet. A professional outside record auditing company was hired to assist EWA in this project to be able to complete this in a timely manner.

This improved Industry Standard method of record keeping will provide readily accessible computerized information, which is backed up with a hard copy.

The following are to be accomplished by this program:

1. Computerized Master Airworthiness Listing for Airframe, Engines, and Appliances for each aircraft.
2. The MERIT Life Limited Engine assemblies will be completed.
3. An Industry Standard Equipment List will be developed for each aircraft to support Weight and Balance procedures.

EWA has currently employed two contract records personnel, and will increase this to a total of eight (8) with the goal of performing this large task within ninety (90) days.

All the aforementioned processes will receive FAA CVG approval, which will be presented to Harold Camden on April 24, 2000.

## 2) CARGO LOADING

Cargo problems observed during surveillance indicates lack of training. Cargo loading and ULD build up program and procedures are not being followed consistently at the Dayton Hub and at the out stations. Recurrent training and the hiring of EWA station Supervisors is a positive step. The new training record procedure should help to keep everyone aware of the current training status of all employees, need continued surveillance to see that the new training is effective.

### EWA Response:

The recurrent training for the contract cargo handlers has been completed, and the EWA trained Contract Ground Handler Supervisors have performed the formal training to their employees. A formal letter from Pat Nelson, EWA Director Ground Services will be provided to Harold Camden to advise him of this accomplishment on, or before April 21, 2000.

The CVG Principals and EWA Management have scheduled a complete review of the Aircraft Loading Manual on Tuesday, April 25, 2000, at Dayton.

## 3) AIRCRAFT MOVEMENT

There appears to be a philosophy to move aircraft at all cost. Maintenance Control and Systems Control appear to encourage crews to take aircraft that are questionable. MEL and Non-MEL abuse seems to enter into the mix on this item.

EWA Response:

EWA has worked in concert with the CVG Principals concerning their recommendations of improved procedural control of the use of the Non-MEL. This improved Non-MEL procedure draft submittal was provided in the RASIP response for CVG review and approval. The anticipated completed and acceptance of this improved procedure is May 10, 2000.

4) **MAINTENANCE TRAINING**

Maintenance repeat write-ups and sign-off using something remotely associated with the malfunction and no maintenance manual references is a problem. Some of it may be training, may be maintenance control, possibly a reliability system that doesn't catch repeat write-ups as soon as it should.

EWA Response:

The Director of Engineering is reviewing the maintenance repeat write-ups and the Director of Line Maintenance is working in concert to improve this issue. A formal response and corrective action will be provided to the FAA CVG Principals on, or before April 28, 2000.

5) **RELIABILITY PROGRAM**

The reliability program needs to be reviewed. It does not appear to be effective. This is evident in the fleet with repeat and chronic write-ups.

EWA Response:

The Director of Engineering previously completed Revision #8, dated January 15, 2000, to the EWA Maintenance Reliability Program Document No. EWA-51990, and received the required EWA Maintenance Review Board Approval for submittal to the FAA CVG Principals for review and approval.

Mr. Camden has advised me to forward this revision to him for their review. EWA responded to the RASIP items 2.12.1 thru 2.12.7 concerning this subject with the program details explained and with written acknowledgment from the RASIP Team that the Revision #8 draft to the Reliability Document corrected some of these findings.

6) **CONTRACT MAINTENANCE**

"C" and "D" Check Facilities have numerous areas of concern; CPCP detection, check cards, supplier parts, vendor training, and EWA representative's responsibility.

Mr. Bob Groszer  
Page 4 of 7  
April 20, 2000

EWA Response:

EWA Quality Control Department has assigned two (2) Quality Control/Assurance Inspection Representatives to the Tennessee Technical and Pemco heavy maintenance facilities to provide increased oversight and address each of these concerns. The Reps will communicate the status of these items back to the Manager of Quality Control and Quality Assurance Managers. They will be assigned at these facilities for at least fifteen days. A detailed report will be provided to the FAA CVG Principals on, or before May 5, 2000.

7) **CARGO RESTRAINT**

One missing bear claw allows that position to be used with no weight reduction, that same scenario can occur in all 18 positions in the aircraft at the same time. This then becomes a safety issue.

EWA Response:

EWA's Aircraft Maintenance Manual, Chapter 3, Section 1, allows for one pallet lock per position that may be broken or missing without any load limitations to that position. This procedure has been FAA accepted in EWA's manual since 1989, and revised in 1997. They are based on approved data and the requirement of NAS3610. I am preparing to send this FAA approved data for your review.

8) **MANUALS**

Manuals are full of policy but very little procedures. This leaves the low man at the out station to interpret policy his way and not the intended way, which may not meet the regulations. Need to put procedures in the manuals.

EWA Response:

These items were addressed in the RASIP response 2.3.1 thru 2.3.11. The FAA CVG Principals working in concert with EWA Technical Service Management completed the initial revision of the Maintenance Policy and Procedure Manual Revision 21 and/or has made additional improvements as represented in the RASIP response. In addition to this on-going manual review process as part of the certificate move requirements, the FAA CVG Principals have requested the following manuals to be sent to their office for the purpose of assigning them to other FAA Inspectors to perform a review. At the completion of this FAA review, the FAA CVG Principals will schedule with the EWA Technical Services Department, a review and revision process, as was performed on other manuals to-date.

*Inspection Program Manual, Volume I thru V*  
*Maintenance Policy and Procedure Manual*  
*Time Limits Manual*  
*Aircraft Loading Manual*  
*EWA Aircraft Maintenance Manual*

9) **O<sup>2</sup> BOTTLES**

Walk around O<sup>2</sup> bottles appear to be altitude limited, currently being addressed.

EWA Response:

A formal letter of substantiating compliance of the walk around O<sup>2</sup> bottles was provided to Harold Camden on April 12, 2000.

10) **STORES PERSONNEL**

Stores personnel were improperly loading aircraft. Training was given and now follow-up surveillance is needed to confirm problem is corrected.

EWA Response:

The Stores personnel recurrent training on aircraft loading procedures was reviewed and accepted by the FAA CVG Principals, and completed on March 23, 2000.

11) **AIRCRAFT ACQUISITION**

Development of acceptable conformity package for new aircraft coming on line.

EWA Response:

As of March 14, 2000, EWA developed, in concert with the FAA CVG Principals, a new FAA Conformity Inspection Checklist Aircraft Records Package. To complement this, Engineering has developed a new "Aircraft Acquisition Checklist" which provides assigned departments tasks and signature responsibility to complement EWA's FAA approved Conformity Inspection DC-8/DC-10 SPO14 checklist. This new FAA package will be completed for the addition of the next DC-10-10F aircraft, and delivered to their office Friday, April 21, 2000.

12) **MAINTENANCE MANUAL**

Maintenance manuals do not have test procedures for testing automatic altitude reporting system and transponder correlation. "Microfiche Manuals" are original operator manuals and have not been updated. These manuals are not then current but they are what EWA uses for return to service of the aircraft, this is a problem. Maintenance manuals also are not updated to reflect changes to comply with alterations accomplished, i.e. STC on DFDR and Digital Air Data Computer System.

EWA Response:

EWA's Engineering Department is currently addressing this item. A formal response to this question will be provided by the Director of Engineering on, or before April 28, 2000.

13) **DFDR UPDATED**

Manuals must be updated after 17 parameter update to aircraft.

EWA Response:

EWA's Engineering Department is currently addressing this item. A formal response to this question will be provided by the Director of Engineering on, or before April 28, 2000.

14) **DFDR DATA**

Data conversion document required when 17 parameters are added to aircraft.

EWA Response:

EWA's Engineering Department is currently addressing this item. A formal response to this question will be provided by the Director of Engineering on, or before April 28, 2000.

15) **DFDR MAINTENANCE**

DFDR maintenance procedures and validation program added to "C" Check for DC-8/10.

EWA Response:

EWA's Engineering Department is currently addressing this item. A formal response to this question will be provided by the Director of Engineering on, or before April 28, 2000.

16) **CVR MAINTENANCE**

CVR maintenance practices, including testing per mfg., and testing prior to battery replacement, needs to be added to work card in an inspection.

EWA Response:

EWA's Engineering Department is currently addressing this item. A formal response to this question will be provided by the Director of Engineering on, or before April 28, 2000.

17) **TIME LIMITS MANUAL**

Chapter 5, number 23, 31, and 34; and Chapter 6, number 23, 31, and 34 may have wrong intervals.

EWA Response:

EWA's Engineering Department is currently addressing this item. A formal response to this question will be provided by the Director of Engineering on, or before April 28, 2000.

Mr. Bob Groszer  
Page 7 of 7  
April 20, 2000

The listed Operations Issue was provided to Dick Hagquist, to which is in process being addressed with the FAA CVG Principals.

It is EWA's Senior Management desire to address and bring closure to each of these items as expeditiously as possible. I will update you again each week.

Sincerely,



Thomas M. Wood  
*Senior Director Quality Control/Assurance*

cc: Kent Scott  
Rene' Visscher  
Ted Graves  
Dick Hagquist  
FAA CVG Principals





April 28, 2000

Mr. Bob Groszer  
Manager FSDO  
4240 Airport Rd.  
Cincinnati, OH 45226

Dear Mr. Groszer:

This letter will serve as Revision #1 to my letter to you, dated April 20, 2000, regarding the FAA Priority List of current Airworthiness/Operations Issues.

I have revised the original responses with additional updates, which are indicated by revision bars in the left hand column.

Emery Worldwide Airlines (EWA) is pleased to provide you this status update of the listed items:

1) **RECORDS:**

Method of record keeping and retrieval of airworthiness directives, life limited components, and weight & balance (including equipment list) needs to be improved.

EWA Response:

- a) The records items were addressed in the RASIP responses to 2.5.4. EWA provided the CVG Principals improvements to the Maintenance Manuals procedures.
- b) The Airworthiness Directive items of the RASIP was responded to in 2.10.3 and 2.10.4. EWA provided an improvement by developing a single computerized EWA Airworthiness Directive Listing for each aircraft.
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EWA is working in concert with the FAA CVG Principals in performing identified manual reviews and will take immediate steps as previously represented to make revisions to improve the procedures.

An EWA Quality Program has been implemented since May 1, 2000 to perform the following tasks on the EWA fleet. A professional outside record auditing company was hired to assist EWA in this project to be able to complete this in a timely manner.

Mr. Bob Groszer  
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April 28, 2000  
Revision 1

This improved Industry Standard method of record keeping will provide readily accessible computerized information, which is backed up with a hard copy.

The following are to be accomplished by this program:

1. Computerized Master Airworthiness Listing for Airframe, Engines, and Appliances for each aircraft.
2. The MERIT Life Limited Engine assemblies will be completed.
3. An Industry Standard Equipment List will be developed for each aircraft to support Weight and Balance procedures.

EWA has currently employed two contract records personnel, and will increase this to a total of eight (8) with the goal of performing this large task within ninety (90) days.

All the aforementioned processes will receive FAA CVG approval, which will be presented to Harold Camden on April 24, 2000.

Harold Camden reviewed and accepted this process by letter to EWA, dated April 26, 2000.

## 2) CARGO LOADING

Cargo problems observed during surveillance indicates lack of training. Cargo loading and ULD build up program and procedures are not being followed consistently at the Dayton Hub and at the out stations. Recurrent training and the hiring of EWA station Supervisors is a positive step. The new training record procedure should help to keep everyone aware of the current training status of all employees, need continued surveillance to see that the new training is effective.

### EWA Response:

The recurrent training for the contract cargo handlers has been completed, and the EWA trained Contract Ground Handler Supervisors have performed the formal training to their employees. A formal letter from Pat Nelson, EWA Director Ground Services will be provided to Harold Camden to advise him of this accomplishment on, or before April 21, 2000.

The CVG Principals and EWA Management have scheduled a complete review of the Aircraft Loading Manual on Tuesday, April 25, 2000, at Dayton.

The second meeting is scheduled for May 2, 2000, to which the FAA will review and accept revisions to the ALM. Distribution of the FAA accepted procedure and training will follow.

3) AIRCRAFT MOVEMENT

There appears to be a philosophy to move aircraft at all cost. Maintenance Control and Systems Control appear to encourage crews to take aircraft that are questionable. MEL and Non-MEL abuse seems to enter into the mix on this item.

EWA Response:

EWA has worked in concert with the CVG Principals concerning their recommendations of improved procedural control of the use of the Non-MEL. This improved Non-MEL procedure draft submittal was provided in the RASIP response for CVG review and approval. The anticipated completion and acceptance of this improved procedure is May 10, 2000.

4) MAINTENANCE TRAINING

Maintenance repeat write-ups and sign-off using something remotely associated with the malfunction and no maintenance manual references is a problem. Some of it may be training, may be maintenance control, possibly a reliability system that doesn't catch repeat write-ups as soon as it should.

EWA Response:

The Director of Engineering is reviewing the maintenance repeat write-ups and the Director of Line Maintenance is working in concert to improve this issue. A formal response and corrective action will be provided to the FAA CVG Principals on, or before April 28, 2000.

EWA's maintenance staff have been trained during formal classroom training concerning sign-offs. This has been standard training since the start of the airlines. This is being addressed by the Director of Maintenance and Senior Director Quality Control/Assurance, with improvements forthcoming.

The Reliability system is the same that has been in place since the start of the airlines in 1989. What has improved by a change recently, is the operating system used to track repeat write-ups. EWA utilized an in-house computer system developed as the airline grew (EWA01), and recently moved completely to a system originally designed by USAir (Maxi Merlin). At EWA this system is called MERIT.

The functionality of MERIT vs. EWA01 is basically the same, however there are differences in the processes. The repeat report generated by MERIT is more cumbersome to use than the previous EWA01. This, combined with low experience with the new system, may have caused some delays in the issuance of action notices.

MERIT does provide EWA's Reliability Section the processes to perform their job and report on repeat items that meet the criteria of 6 Pireps in 10 days.

The Reliability Section implemented an improved tracking process that is in effect as of this date (see memo attached).

5) **RELIABILITY PROGRAM**

The reliability program needs to be reviewed. It does not appear to be effective. This is evident in the fleet with repeat and chronic write-ups.

EWA Response:

The Director of Engineering previously completed Revision #8, dated January 15, 2000, to the EWA Maintenance Reliability Program Document No. EWA-51990, and received the required EWA Maintenance Review Board Approval for submittal to the FAA CVG Principals for review and approval.

Mr. Camden has advised me to forward this revision to him for their review. EWA responded to the RASIP items 2.12.1 thru 2.12.7 concerning this subject with the program details explained and with written acknowledgment from the RASIP Team that the Revision #8 draft to the Reliability Document corrected some of these findings.

In response, as Director of Engineering, the Reliability criteria for repeat write-ups are 6 Pireps in 10 days criteria for chronic problems are not specifically defined. This is not to say that EWA has not experienced chronic problems that should have been identified by the Reliability Section. In fact, there have been many chronic problems identified by Reliability and without the formal issuance of an action notice. The Technical Analysts and Maintenance Control have worked these problems cooperatively in the past, and continues to do so with improved processes.

The Reliability Program does not represent to be a problem. I have taken steps to heighten the level of surveillance by having repeats tracked by 2 digits rather than by 4 digit ATA codes. This will eliminate a different coding on the sub-chapter for the same general fault being missed during review. Additionally, the fleet is being split into 4 groups, one for each Analyst for them to track smaller groups of aircraft. This will allow better focus for each group of aircraft rather than the whole fleet being grouped together (see memo attached).

6) **CONTRACT MAINTENANCE**

“C” and “D” Check Facilities have numerous areas of concern; CPCP detection, check cards, supplier parts, vendor training, and EWA representative’s responsibility.

EWA Response:

EWA Quality Control Department has assigned two (2) Quality Control/Assurance Inspection Representatives to the Tennessee Technical and Pemco heavy maintenance facilities to provide increased oversight and address each of these concerns. The Reps will communicate the status of these items back to the Manager of Quality Control and Quality Assurance Managers. They will be assigned at these facilities for at least fifteen days. A detailed report will be provided to the FAA CVG Principals on, or before May 5, 2000.

7) **CARGO RESTRAINT**

One missing bear claw allows that position to be used with no weight reduction, that same scenario can occur in all 18 positions in the aircraft at the same time. This then becomes a safety issue.

EWA Response:

EWA's Aircraft Maintenance Manual, Chapter 3, Section 1, allows for one pallet lock per position that may be broken or missing without any load limitations to that position. This procedure has been FAA accepted in EWA's manual since 1989, and revised in 1997. They are based on approved data and the requirement of NAS3610. I am preparing to send this FAA approved data for your review.

8) **MANUALS**

Manuals are full of policy but very little procedures. This leaves the low man at the out station to interpret policy his way and not the intended way, which may not meet the regulations. Need to put procedures in the manuals.

EWA Response:

These items were addressed in the RASIP response 2.3.1 thru 2.3.11. The FAA CVG Principals working in concert with EWA Technical Service Management completed the initial revision of the Maintenance Policy and Procedure Manual Revision 21 and/or has made additional improvements as represented in the RASIP response. In addition to this on-going manual review process as part of the certificate move requirements, the FAA CVG Principals have requested the following manuals to be sent to their office for the purpose of assigning them to other FAA Inspectors to perform a review. At the completion of this FAA review, the FAA CVG Principals will schedule with the EWA Technical Services Department, a review and revision process, as was performed on other manuals to-date.

*Inspection Program Manual, Volume I thru V*  
*Maintenance Policy and Procedure Manual*  
*Time Limits Manual*  
*Aircraft Loading Manual*  
*EWA Aircraft Maintenance Manual*

9) **O<sup>2</sup> BOTTLES**

Walk around O<sup>2</sup> bottles appear to be altitude limited, currently being addressed.

EWA Response:

A formal letter of substantiating compliance of the walk around O<sup>2</sup> bottles was provided to Harold Camden on April 12, 2000.

#### 10) STORES PERSONNEL

Stores personnel were improperly loading aircraft. Training was given and now follow-up surveillance is needed to confirm problem is corrected.

EWA Response:

The Stores personnel recurrent training on aircraft loading procedures was reviewed and accepted by the FAA CVG Principals, and completed on March 23, 2000.

#### 11) AIRCRAFT ACQUISITION

Development of acceptable conformity package for new aircraft coming on line.

EWA Response:

As of March 14, 2000, EWA developed, in concert with the FAA CVG Principals, a new FAA Conformity Inspection Checklist Aircraft Records Package. To complement this, Engineering has developed a new "Aircraft Acquisition Checklist" which provides assigned departments tasks and signature responsibility to complement EWA's FAA approved Conformity Inspection DC-8/DC-10 SPO14 checklist. This new FAA package will be completed for the addition of the next DC-10-10F aircraft, and delivered to their office Friday, April 21, 2000.

The first data package was provided to Harold Camden for aircraft N997GE and accepted by letter to EWA, dated April 26, 2000. The second data book was provided to Mr. Camden on April 21, 2000 for the 3<sup>rd</sup> DC-10-10F to be added to the fleet.

#### 12) MAINTENANCE MANUAL

Maintenance manuals do not have test procedures for testing automatic altitude reporting system and transponder correlation. "Microfiche Manuals" are original operator manuals and have not been updated. These manuals are not then current but they are what EWA uses for return to service of the aircraft, this is a problem. Maintenance manuals also are not updated to reflect changes to comply with alterations accomplished, i.e. STC on DFDR and Digital Air Data Computer System.

EWA Response:

EWA's Engineering Department is currently addressing this item. A formal response to this question will be provided by the Director of Engineering on, or before April 28, 2000.

In response, as Director of Engineering, the testing procedures for the transponder altitude reporting functions are located in the EWA Aircraft Maintenance Manual, Chapter 9, page 9.

Maintenance Manuals for the DFDR (FDR) were submitted to the SLC FSDO in January of 1999 for review. The SLC office did not respond to the manuals for acceptance. I will have a copy forwarded to the CVG FSDO for review within the next 30 days.

Maintenance manuals for the Digital Air Data System have been published as a supplemental manual. This manual has been in distribution since January 1999, wiring diagrams for this system were published and distributed in September of 1999.

13) **DFDR UPDATED**

Manuals must be updated after 17 parameter update to aircraft.

EWA Response:

EWA's Engineering Department is currently addressing this item. A formal response to this question will be provided by the Director of Engineering on, or before April 28, 2000.

See response for #12.

14) **DFDR DATA**

Data conversion document required when 17 parameters are added to aircraft.

EWA Response:

EWA's Engineering Department is currently addressing this item. A formal response to this question will be provided by the Director of Engineering on, or before April 28, 2000.

In response, as Director of Engineering, the data conversion document was sent to the SJC FSDO at approximately the same time as the maintenance manuals were sent. We received a verbal comment from the PAI who stated "This document contains way more information than is required". This has been accepted fully and no reply was ever made other than the stated above.

I will have a copy forwarded to the CVG FSDO for review within the next 30 days.

15) **DFDR MAINTENANCE**

DFDR maintenance procedures and validation program added to "C" Check for DC-8/10.

EWA Response:

EWA's Engineering Department is currently addressing this item. A formal response to this question will be provided by the Director of Engineering on, or before April 28, 2000.

See response for #12.

16) **CVR MAINTENANCE**

CVR maintenance practices, including testing per mfg., and testing prior to battery replacement, needs to be added to work card in an inspection.

Mr. Bob Groszer  
Page 8 of 8  
April 28, 2000  
Revision 1

EWA Response:

EWA's Engineering Department is currently addressing this item. A formal response to this question will be provided by the Director of Engineering on, or before April 28, 2000.

The Engineering Department will have this incorporated into the appropriate work card within the next 60 days.

17) **TIME LIMITS MANUAL**

Chapter 5, number 23, 31, and 34; and Chapter 6, number 23, 31, and 34 may have wrong intervals.

EWA Response:

EWA's Engineering Department is currently addressing this item. A formal response to this question will be provided by the Director of Engineering on, or before April 28, 2000.

In response, as Director of Engineering, without having more specific information, I have instructed my staff to review the entire section to ensure compliance. I will submit any changes required after review within 60 days.

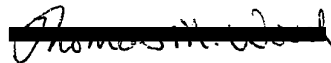
The listed Operations Issue was provided to Dick Hagquist, to which is in process being addressed with the FAA CVG Principals.

It is EWA's Senior Management desire to address and bring closure to each of these items as expeditiously as possible. I will update you again each week.

I trust this update and additional action taken by EWA meets with the satisfaction of your office.

attachment

Sincerely,



Thomas M. Wood  
Senior Director Quality Control/Assurance

cc: Kent Scott  
Rene' Visscher  
Bruce Robbins  
Ted Graves  
Dick Hagquist  
FAA CVG Principals



July 11, 2000



August 14, 2000

Mr. Bob Groszer  
Manager CVG FSDO  
4240 Airport Rd.  
Cincinnati, OH. 45226

Mr. Groszer:

In your July 11, 2000 letter to Mr. Kent Scott, you expressed concern with the status of several projects that Emery Worldwide Airlines ("EWA") has undertaken to ensure the safety and airworthiness of its fleet. You also indicated that the CVG FSDO will not authorize EWA to add any aircraft to EWA's certificate until EWA addresses your concerns. We have carefully and thoroughly reviewed the issues that you identified and are writing this letter to respond to your concerns.

- 1) **QUESTION:** The aircraft records review, including the AD summary listing, which was started May 1, 2000 and due to be completed within 90 days, is still incomplete. To date, ADs of three (3) aircraft have been completed, which equates to one every three weeks. Out of the three (3) aircraft that were completed, your company has given us a self-disclosure on one AD which was over-flown. This whole project is to determine the status of the fleet regarding ADs and Airworthiness. If we use the first three aircraft as a reference, it would appear that 33% of the fleet has open ADs, and therefore unairworthy.

**EWA RESPONSE:**

**Aircraft Records Audit Program**

The Aircraft Records Audit Program, which was voluntarily undertaken by EWA on May 1, 2000 in an effort to enhance our Aircraft Records system, and subsequently modified in discussions with your office on July 3, 2000, was complete August 1, 2000. An FAA audit of Aircraft Records, which started August 7, 2000, has been completed, and the FAA Audit Team out-brief indicated that the audit did not reveal any non-compliance findings, including the records review of the Airworthiness Directives or Life Limited Parts (over 6,000 regulated items).

A second expanded phase of the Aircraft Records Audit Program has been voluntarily implemented, and is now underway. It will provide a further, refined organization of the Aircraft Record filing system to reflect the new presentation format currently established by the Airworthiness Directives and Life Limited Parts.

- 2) **QUESTION:** The powerplant "On Wing Hot Section" program was to be completed by June 30, 2000. To date not one aircraft has been hot sectioned.

**EWA RESPONSE:**

**JT3D Powerplant Program Improvements**

The EWA JT3D engines had experienced an isolated EGT problem following the installation of the Stage III Hushkits to meet regulatory operating requirements. Revision eighteen (18) of EWA's Inspection Program Manual (IPM), Volume III was effective during this time frame. It was determined by the technical input of the Hushkit STC Holder and Pratt & Whitney that there was a need to enhance the workscope for the repair of these engines with the Hushkit installation.

As the result of EWA's FAA approved Reliability Program recommendations, the Powerplant Managers began the evaluation and development of improved procedures that started generation of revision nineteen (19) of the IPM, Volume III. This revision addressed several issues to enhance the performance of the JT3D fleet. The manufacturer's (Pratt & Whitney's) manual established the limit of a 2.3% reduction in blade chord of the LPC blades. EWA established the requirement for a maximum of 1.8% reduction in blade chord to improve compressor performance. The turbine NGV's were enhanced by the addition of Service Bulletin 6327 by installing airfoil replacement vanes in certain areas identified by Pratt & Whitney as being "hot spots".

This program improvement produced positive results because it increased the test cell EGT margins by fifteen degrees or more. A follow-up review of EWA's records did not reveal any engines with the 1.8% maximum chord reduction being identified as stalling during last winter.

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#### **Fleet Transition Plan**

EWA is in the process of returning ten (10) leased DC8-60 series aircraft that have the JT3D powerplant engines installed on them. These returns will reduce the number of JT3D engines by forty (40) of the fifty-six (56) we are currently flying, or a 70% reduction. At the present time seven (7) of the aircraft to be returned are out of service with lease return workscopes being accomplished. These workscopes include the transferring of engines to the correct airframe of the lessor's aircraft.

After the above transfers have been completed, EWA will have sixteen (16) JT3D engines to maintain for eight (8) months. To ensure that we maintain serviceable engines with regard to stall margins, we have adjusted our minimum build specs to increase compressor performance and to identify areas in the "hot section" which will receive hardware more conducive to the temperatures encountered in areas identified by Pratt & Whitney.

There has been a Maintenance Manual "Trouble-Shooting Tree" introduced from our Engineering Department. This procedure will be utilized in each case of a reported compressor surge or stall. It will allow the Line Mechanics to follow a procedure to determine the serviceability of an engine and "decide with confidence" whether the engine requires replacement.

With the aforementioned proactive steps taken by EWA, these programs have reduced and will eliminate compressor surge and stall problems on the JT3D fleet.

- 3) **QUESTION:** Also, another program that has been completed, but is not working as planned is the Load Manager's Program. The people reportedly have been hired and trained, but the reports we have received indicate that these managers are not supervising the loading. The basic cargo loading program has not been resolved.

#### **EWA RESPONSE:**

##### **Ground Services Supervisor Program**

Where introduced, this voluntary Ground Service Supervisor Program is working exactly as planned. Our Ground Service Supervisors do not act as supervisors of the work of our

Mr. Bob Groszer  
Letter dated 08-14-00  
Page 4 of 4

independent contractor groundhandlers, but, rather, act as facilitators or troubleshooters for EWA at its outstation locations where groundhandlers have been engaged. They also perform, on a spot-check basis, certain independent audit-like activities, including ULD airworthiness inspections and confirmation that ULD loading positions conform to the Load Planning Sheet description prepared by the independent contractor groundhandler.

We believe that our basic cargo loading program is complete, sufficient, compliant and in place, and would request your advice on those parts of the program which you believe have not been resolved. Your comments will assist us in strengthening our program, if warranted.

Additionally, we would appreciate your detail on the reports you received, so that we may respond, and take appropriate corrective action, if warranted.

In the past month, we have received several positive comments from FAA personnel and EWA Crew Members on this new program initiative. Our Assistant POI reported from MCO that our Supervisor was performing adequately during his audit of that operation. Other regional inspections at BNA, BWL, DEN, and STL have been positive as well. Crew Members have had positive comments about ATL, DFW, and MCO as well.

In short, EWA's program has enhanced safety and continues to show benefits on a daily basis.

We believe the above response completely addresses the issues which you raised in your July 11, 2000 letter, and we are prepared to provide you with additional information, if requested. We would also ask that you consider the above response, and the intervening activities by EWA and the FAA, to have clearly confirmed and demonstrated that we are capable of operating and maintaining our fleet, and that the restriction by the CVG FSDO against additional aircraft be removed. We request this removal as soon as possible, due to the potential significant financial impact such restriction will have on our operations in the immediate future.

Sincerely,



Thomas M. Wood  
Senior Director Quality Control

cc: Kent Scott  
Bob Conlon  
Rene' Visscher

lc

cc: Tom Wood  
Bob Conlon



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

RECEIVED  
JUL 11 2000  
KENT T. SCOTT

July 11, 2000

Mr. Kent T. Scott  
President and COO  
Emery Worldwide Airlines  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott,

Emery Worldwide Airlines provided the CVG FSDO with initiation and/or completion dates for a number of projects. Unfortunately, the target dates for some projects have passed with no action or partial action and in one case, the completed action appears to be inadequate.

Two examples-----

1. The aircraft records review including the AD summary listing, which was started May 1, 2000 and due to be completed within 90 days, is still incomplete. To date ADs of three aircraft have been completed, which equates to one every three weeks. Out of the three aircraft that were completed, your company has given us a self-disclosure on one AD which was over flown. This whole project is to determine the status of the fleet regarding ADs. and Airworthiness. If we use the first three aircraft as a reference, it would appear that 33% of the fleet has open ADs, and therefore unairworthy.
2. The powerplant 'On Wing Hot Section' program was to be completed by June 30, 2000. To date not one aircraft has been hot sectioned.

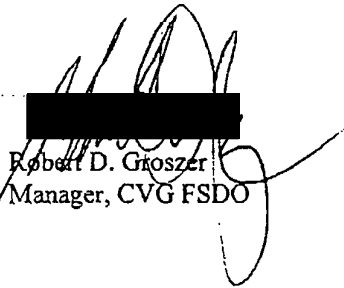
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Because of these issues, it would not be prudent to continue to add aircraft to your certificate. Therefore, the CVG FSDO will not authorize any additional aircraft until

Emery Worldwide Airlines has been able to demonstrate to us that they are capable of operating and maintaining the current fleet.

We will closely monitor EWA's progress in all areas so as not to delay the fleet growth, and when Emery Worldwide Airlines has completed the AD summaries, the engine "On-Wing Hot Sections", and resolved the cargo loading issue, we will proceed with the addition of aircraft to the fleet.

Sincerely,



Robert D. Groszer  
Manager, CVG FSDO

EWA'S RESPONSE  
TO LETTER DATED

October 12, 2000





U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Flight Standards District Office  
4240 Airport Road  
Cincinnati, Ohio 45226  
[REDACTED]

March 28, 2000

Mr. Gary Plaster  
Manager of Maintenance Training  
7406 Webster St.  
Dayton, Ohio 45414

Dear Mr. Plaster,


On March 22, 2000, inspectors Harold Camden, Les Korody, Larry Vonderschmidt, and I observed a training session to be used for recurrent training for the Stores personnel. This training was requested due to loading issues presented to Emery Worldwide Airlines.

The following areas were addressed with you at the conclusion of the session.

1. The training department will only use EWA reviewed and FAA accepted training material in its training classes.
2. Syllabuses for all accepted courses will have dates, times, subjects, and overall time frames for review to all parties concerned.
3. The duties and responsibilities for each group being taught will be available.
4. All manuals used as reference for the course will be noted and made available to all individuals taking the class.
5. Handouts will be made available to students of pertinent material used during the training class.
6. There is a need for additional Experienced Technical Instructors for the aircraft currently being operated by Emery Worldwide Airlines.

If you have any questions, please call me at [REDACTED]. We will schedule a follow class review in the near future.

Sincerely,

  
[REDACTED]

Jim Franklin  
Assistant Principal Maintenance Inspector



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Flight Standards District Office  
4240 Airport Road  
Cincinnati, Ohio 45226  
[REDACTED]

March 31, 2000

Mr. Gary Plaster  
Manager of Maintenance Training  
7406 Webster St.  
Dayton, Ohio 45414

Dear Mr. Plaster,

On March 30, Inspectors Jim Franklin, Les Korody, Larry Sheaffer and I observed a Recurrent Training Class for all the aircraft loading personnel in the Emery Worldwide Airlines System. As of March 30, this class is approved for a 90 day period at which time a follow-up review will be conducted.

If you have any questions, please call us here at the office at [REDACTED]

Sincerely,

  
[REDACTED]  
Harold R. Camden  
Principal Maintenance Inspector



April 19, 2000

Mr. Harold Camden  
EWA PMI  
4240 Airport Rd.  
Cincinnati, OH. 45226

Mr. Camden:

This letter is a follow-up to your letter's dated March 27, 2000, March 28, 2000, and March 31, 2000. I will also respond to Jim Franklin's letter to Gary Plaster, dated March 28, 2000.

This response is to acknowledge receipt of the referenced letters, and to provide a response where required.

**March 27, 2000 letter (see attachment), EWA response**

- 1) Gary Plaster utilized EWA training material with the Recurrent Training of Stores personnel that was provided to Jim Franklin.
- 2) Gary Plaster has initiated the new course syllabus, per your recommendation, and will revise all EWA training course syllabus in the next revision to the Maintenance Policy and Procedure Manual.
- 3) It is understood by EWA that all new training conducted by the Training Department will be presented to the FAA to review prior to implementation.
- 4) No response required. Thank you for your support.
- 5) All new hired personnel will be given an Initial Training Program in Aircraft Loading.
- 6) The improved Non-MEL procedure was provided in the RASIP response for your review and acceptance.
- 7) The use of the EWA Load Planning Sheet is formally addressed in the Aircraft Loading Manual FAA/EWA review scheduled for April 25, 2000.
- 8) What additional information regarding Flight #331, dated March 16, 2000, is needed, and what aircraft?
- 9) The records review of N997GE is on-going, pending your acceptance of the new computerized EWA Master Listing developed by Edward Jones. Ed will provide this to you on Monday, April 24, 2000, with the changes, per your request.

**March 28, 2000 letter (see attachment), EWA Response**

- 1) The improved Non-MEL procedures was provided in the RASIP response for your review and acceptance.
- 2) The AD note subscription service was presented to you and accepted.
- 3) The new Training Department personnel was submitted to Senior Management for processing.
- 4) The job posting for six (6) new "B" Check Station Quality Control Aircraft Inspectors has been completed. A review of candidates is being performed by Edward Jones.
- 5) The new EWA Equipment List is being developed and will be presented for your review and acceptance Monday, April 24, 2000, by Ronald Moody.
- 6) The Engineering Department has developed an E.O. that installs tie downs in the designated lower compartment of the DC-8. Upon FAA DER approval, Engineering will send you a copy of the E.O., as well as the applicable manual change request.

**March 31, 2000 letter (see attachment), EWA Response**

Acknowledgement of receipt of FAA approval for Recurrent Training Class for all aircraft loading personnel. Thank you for your support in helping to promote this training in a short period of time.

**March 28, 2000 letter (see attachment), EWA Response**

Acknowledgement of receipt of Jim Franklin's letter to Gary Plaster concerning his review and acceptance of the Recurrent Training for the Stores Personnel.

Mr. Gary Plaster has discussed the implementation of the six (6) referenced areas you addressed in your letter.

Thank you for your support with this program. Your improved recommendations are taken serious by EWA in the example of the areas Gary has already addressed and/or the implementation plan.

I trust Harold, this written response will keep you formally advised of the questions you have and/or commitments we have made to you.

I speak on behalf of EWA Senior Management, in expressing our appreciation for your consorted efforts to improve EWA's procedures and processes.

attachments

Sincerely,



Thomas M. Wood

Senior Director Quality Control/Assurance

cc: Rene' Visscher  
Technical Services Directors  
QC/QA Managers



August 14, 2000

Mr. Bob Groszer  
Manager CVG FSDO  
4240 Airport Rd.  
Cincinnati, OH. 45226

Mr. Groszer:

In your July 11, 2000 letter to Mr. Kent Scott, you expressed concern with the status of several projects that Emery Worldwide Airlines ("EWA") has undertaken to ensure the safety and airworthiness of its fleet. You also indicated that the CVG FSDO will not authorize EWA to add any aircraft to EWA's certificate until EWA addresses your concerns. We have carefully and thoroughly reviewed the issues that you identified and are writing this letter to respond to your concerns.

- 1) **QUESTION:** The aircraft records review, including the AD summary listing, which was started May 1, 2000 and due to be completed within 90 days, is still incomplete. To date, ADs of three (3) aircraft have been completed, which equates to one every three weeks. Out of the three (3) aircraft that were completed, your company has given us a self-disclosure on one AD which was over-flown. This whole project is to determine the status of the fleet regarding ADs and Airworthiness. If we use the first three aircraft as a reference, it would appear that 33% of the fleet has open ADs, and therefore unairworthy.

**EWA RESPONSE:**

**Aircraft Records Audit Program**

The Aircraft Records Audit Program, which was voluntarily undertaken by EWA on May 1, 2000 in an effort to enhance our Aircraft Records system, and subsequently modified in discussions with your office on July 3, 2000, was complete August 1, 2000. An FAA audit of Aircraft Records, which started August 7, 2000, has been completed, and the FAA Audit Team out-brief indicated that the audit did not reveal any non-compliance findings, including the records review of the Airworthiness Directives or Life Limited Parts (over 6,000 regulated items).

A second expanded phase of the Aircraft Records Audit Program has been voluntarily implemented, and is now underway. It will provide a further, refined organization of the Aircraft Record filing system to reflect the new presentation format currently established by the Airworthiness Directives and Life Limited Parts.

- 2) **QUESTION:** The powerplant "On Wing Hot Section" program was to be completed by June 30, 2000. To date not one aircraft has been hot sectioned.

**EWA RESPONSE:**

**JT3D Powerplant Program Improvements**

The EWA JT3D engines had experienced an isolated EGT problem following the installation of the Stage III Hushkits to meet regulatory operating requirements. Revision eighteen (18) of EWA's Inspection Program Manual (IPM), Volume III was effective during this time frame. It was determined by the technical input of the Hushkit STC Holder and Pratt & Whitney that there was a need to enhance the workscope for the repair of these engines with the Hushkit installation.

As the result of EWA's FAA approved Reliability Program recommendations, the Powerplant Managers began the evaluation and development of improved procedures that started generation of revision nineteen (19) of the IPM, Volume III. This revision addressed several issues to enhance the performance of the JT3D fleet. The manufacturer's (Pratt & Whitney's) manual established the limit of a 2.3% reduction in blade chord of the LPC blades. EWA established the requirement for a maximum of 1.8% reduction in blade chord to improve compressor performance. The turbine NGV's were enhanced by the addition of Service Bulletin 6327 by installing airfoil replacement vanes in certain areas identified by Pratt & Whitney as being "hot spots".

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Mr. Bob Groszer  
Letter dated 08-14-00  
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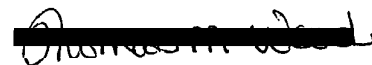
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Sincerely,



Thomas M. Wood  
Senior Director Quality Control

cc: Kent Scott  
Bob Conlon  
Rene' Visscher

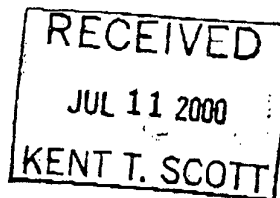
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cc: Tom Wood  
Bob Conlon



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**



July 11, 2000

Mr. Kent T. Scott  
President and COO  
Emery Worldwide Airlines  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott,

Emery Worldwide Airlines provided the CVG FSDO with initiation and/or completion dates for a number of projects. Unfortunately, the target dates for some projects have passed with no action or partial action and in one case, the completed action appears to be inadequate.

Two examples-----

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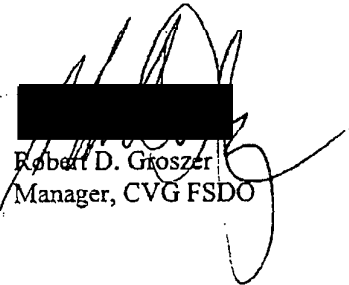
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Sincerely,



Robert D. Groszer  
Manager, CVG FSDO



KENT T. SCOTT  
President and Chief Operating Officer

October 16, 2000

Mr. Harold R. Camden  
Principal Maintenance Inspector  
Federal Aviation Administration  
4240 Airport Road  
Cincinnati, Ohio 45226

Dear Mr. Camden,

In response to your correspondence dated October 12, 2000, Emery Worldwide Airlines would like to assure you that our efforts to increase DC-10 maintenance training and troubleshooting capability is a principal objective of the airline.

EWA's Maintenance Control department has been restructured to embody two specialized fleet surveillance desks for DC-10 series aircraft and DC-8 series aircraft. These permanent positions will address chronic repeat write ups, DMI's, and troubleshooting. We believe these immediate changes will address the needs of EWA and the concerns of your office.

Eight (8) DC-10 expert maintenance consultants have been contracted from Airline Maintenance Training (AMT) for the remainder of 2000. These individuals will be utilized in key Maintenance Control positions, specifically specialized DC-10 fleet desks, as well as be dispatched to the field maintenance stations as needed. Consultants will also perform on the job training. Weekly reports are submitted by AMT documenting any areas of performance that could be enhanced. This arrangement will be reviewed in December 2000 and EWA will evaluate the value of extending the AMT project at that time.

Dick Funk, Vice President Technical Services for Pegasus Aviation, has been contracted by EWA to provide technical support and expertise. This highly qualified professional will assist with DC-10 technical support, evaluate maintenance operations, and recommend actions to increase Maintenance productivity and capability. The additional administrative oversight will ensure that unsatisfactory procedural and operational matters are recognized and resolved.

Ten (10) permanent EWA employees have been reassigned to Maintenance Control to assist with troubleshooting and chronic write ups. These staff will remain in Dayton at the fleet desks and train permanent replacements as they are obtained. These individuals, in concert with the contract consultants, will operate the specialized fleet desks to ensure troubleshooting and monitoring of repeat/chronic maintenance issues are effectively accomplished.

The Engineering department is employing the services of three (3) contract consultants to assist in the need for additional maintenance support. Two (2) additional permanent engineering positions will be staffed upon locating qualified candidates. Additionally, Quality Control, Aircraft Records, and Quality Assurance management are aggressively pursuing and evaluating candidates to fill vacant permanent full time positions within their respective areas.

Maintenance Training has scheduled a DC-10/-30 Systems course to begin October 22, 2000. This forty (40) hour class will consist of eighteen (18) EWA mechanics. During 2001, EWA has scheduled seven (7) forty (40) hour DC-10/-30 Systems classes, two (2) one hundred twenty hour (120) hour in depth DC-10/-30 System classes, two (2) eighty (80) hour CF6 Line Maintenance classes, one (1) DC-10 Run-Up Taxi course, and two (2) DC-10/-30 Avionics/Auto-Pilot Electrical courses. Scheduling of additional classes will occur in the near future.

Emery Worldwide Airlines is confident in its ability to accommodate additional DC-10 series aircraft.

Please advise of a convenient time that we may discuss this matter further.

Sincerely,

A handwritten signature in black ink, appearing to read "Kent Scott", is written over a solid black rectangular redaction box.

Kent Scott  
President and Chief Operating Officer

cc: Richard Jacobson



October 5, 2000

Mr. Harold Camden  
EWA PMI  
4240 Airport Rd.  
Cincinnati, OH. 45226

Mr. Camden:

This letter is in response to your letter to Mr. Kent Scott, dated September 28, 2000, regarding the status of Emery Worldwide Airlines (EWA) DC-10 Maintenance Training.

Maintenance Training for the DC-10 Systems class is scheduled from October 22 thru 26, 2000, and will be the last scheduled class for the year 2000. I have provided you the DC-10 year 2001 class schedule which reflects the same high standard of training that we have previously demonstrated.

EWA's Maintenance Training program, almost eleven (11) years, continues to comply with the Federal Aviation Regulation (FAR) 121.375, in that it ensures EWA mechanics, who determine the adequacy of work done, are fully informed by procedures and techniques, for new equipment in use, and are competent to perform their duties.

From the beginning of the DC-10 Maintenance Training Program to-date (1998, 1999, 2000), EWA has formally trained 348 mechanics, totaling over 1,462 formal instruction hours.

The airline is proud of its achievements by demonstrating an excellent rating of training provided, by the receipt of the FAA Technical Training Awards in 1994, 1995, 1996, 1997 and 1999. The highest award for the Organization (Airline), the Diamond Certificate of Excellence, was received each of these years.

EWA has identified the DC-10 training required to place the aircraft on the certificate, and has continued to far exceed the minimum requirement of the number of mechanics trained to add the scheduled DC-10 (9 total) to our operating certificate.


Page 2 of 2  
Letter – Harold Camden  
October 5, 2000

The Maintenance Training Section will develop recurrent training based on input from the Quality Control, Quality Assurance, Maintenance, Engineering Departments and the Continuing Analysis and Surveillance Program (Reliability Program) to address specific training that may be required to promote the aircraft reliability.

Please contact me if you would like to discuss this further.

attachments

Sincerely,



Thomas M. Wood  
*Senior Director Quality Control*

cc: Kent Scott  
Dick Jacobson  
Dave Ungemach  
Dan Kirkpatrick  
Gary Plaster

lc



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**Federal Aviation Administration**  
4240 Airport Road  
Cincinnati, Ohio 45226  
[REDACTED]

September 28, 2000

**Mr. Kent Scott**  
President & Chief Operating Officer  
Emery Worldwide Airlines  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott,

We have been advised that the DC-10 Contract Training for Emery Worldwide Airlines Mechanics will be coming to an end in Oct. 2000. We were advised that only one class, a one week Familiarization Class, will be held for the remainder of the 2000 fiscal year. We are also currently looking into problems with troubleshooting, correcting, and returning to service discrepancy items on the DC-10 aircraft currently operated by Emery Worldwide Airlines.

Emery Worldwide Airlines must provide training on a continuous basis, covering all the systems and troubleshooting procedures on DC 10 aircraft as required by the your Operating Certificate.

Please provide us with the current and future DC-10 training program, dates, and subjects that will be provided to the Maintenance Organization for the remainder of fiscal year 2000 and the projected 2001 fiscal year. This will identify the training needed now and for adding additional DC10 aircraft to the Emery fleet in the future. Please provide us with this information within the next 10 days.

If you have any questions, please call me here at [REDACTED]

Sincerely,

A handwritten signature in black ink, which appears to read "Harold R. Camden".

**Harold R. Camden**  
Principal Maintenance Inspector

cc Mr. Gary Plaster

# Emery Worldwide Airlines

## DC-10-10/-30 Maintenance Training

### Courses Conducted 1998, 1999 and 2000

#### 1998

<u>DC10 Systems</u> 40 hrs 10 students	<u>DC10 Systems</u> 40 hrs 9 students	<u>DC10 Systems</u> 40 hrs 15 students	<u>DC10 Avi Elect</u> 40 hrs 8 students	<u>CF6-6 Exec Fam</u> 24 hrs 3 students
<u>CF6-6 Exec Fam</u> 24 hrs 3 students	<u>CF6-6 Exec Fam</u> 24 hrs 7 students			

Total 1998 hours of instruction: 232  
Total 1998 attendance: 55

#### 1999

<u>DC Autopilot/LR Nav</u> 40 hrs 9 students	<u>DC10 Avionics Elect</u> 40 hrs 6 students	<u>DC10 Avionics Elect</u> 40 hrs 7 students	<u>CF6-6 Engine</u> 80 hrs 4 students
<u>CF6-6 Engine</u> 80 hrs 11 students	<u>DC10 Runup/Taxi</u> 16 hrs 9 students	<u>DC10 Systems</u> 120 hrs 9 students	<u>DC10 Tech Man</u> 16 hrs 14 students
<u>MSG 3 Requirements</u> 10 hrs 12 students	<u>MSG 3 Requirements</u> 10 hrs 9 students	<u>DC10 Systems</u> 40 hrs 7 students	<u>DC10 Systems</u> 40 hrs 7 students
<u>DC10 Systems</u> 40 hrs 12 students	<u>DC10 Systems</u> 40 hrs 12 students	<u>DC10 Systems</u> 40 hrs 9 students	

Total 1999 hours of instruction: 652  
Total 1999 attendance: 137

#### 2000

<u>DC10-10/-30 Av Elect</u> 40 hrs 9 students	<u>DC10-10/-30 Av Elect</u> 40 hrs 5 students	<u>DC10-10/-30 Av Elect</u> 40 hrs 12 students
<u>DC10-10/-30 Systems</u> 40 hrs 18 students	<u>DC10-10/-30 Systems</u> 40 hrs 17 students	<u>DC10-10/-30 Systems</u> 40 hrs 11 students
<u>DC10-10/-30 Systems</u> 120 hrs 17 students	<u>DC10-10/-30 Systems</u> 120 hrs 17 students	<u>DC10-10/-30 Systems Exec Course</u> 6 hrs 9 students



DC10-10/-30 Systems Exec Course

6 hrs

18 students

CF6-6 Engine

80 hrs

7 students

DC10-10/-30 Systems Exec Course

6 hrs

16 students

DC10-10/-30 Systems (Oct 22,00)\*

40 hrs

Estimating 18 students

Total 2000 hours of instruction: **578**

Total 2000 attendance: **156**

---

Grand total 1998, 1999, 2000 hours of instruction: **1,462**

Grand total 1998, 1999, 2000 attendance: **348**

Prepared by Anita Smith  
Reviewed by Gary Plaster  
October 5, 2000

## YEAR 2001, PROPOSED FORMAL CLASSROOM TRAINING

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV
<b>COURSE</b>											
BASIC INDOC COURSE	7 - 11 28 →	1 18 - 22	11 - 15	1 - 5 22 - 26	13 - 17	3 - 7 24 - 28	15 - 19	5 - 9 26 - 30	16 - 20	7 - 11 28 →	1 11 - 15
DC-8 SYSTEMS	14 - 18	25 →	1	15 - 19	13 - 17		15 - 19	26 - 30	30 →	4	11 - 15
JT3D ENGINE			11 - 15				29 →	2			
CFM-56 GEN FAM BOROSCOPE			10 - 16		14 - 18 21 - 22	18 - 22 25 - 26					
DC-8 RIGGING				29 →	3					14 - 18	
DC-8 AVIONICS/ELECTRICAL			25 - 29		20 - 24				9 - 13		
DC-8 AP/NAV				8 - 12						21 - 25	
**DC-8 RUNUP TAXI		18 - 22				17 - 21			16 - 20		
FUELER TRAINING								20	10		
AIRCRAFT LOADER											
HAZMAT SHIPPERS											
DC-10 SYSTEMS	21 - 25			22 - 26	20 - 24	24 - 28			9 - 13	7 - 11	4 - 8
DC-10 AVIONICS/AUTO-PILOT ELECTRICAL		4 - 8				10 - 14					
DC-10 SYSTEMS 3 WEEKS			18 →	5				5 - 23			
**DC-10 RUN-UP TAXI							22 - 26				
CF6-6/50 GEN FAM/BOROSCOPE							5 - 18				
GE CFM-56 LINE MAINT											
GE CF6-6 LINE MAINT											

Issued and Prepared by: Debbie Griffin / Program Specialist / Maintenance Training

Approved by: Gary Plaster / Manager of Maintenance Training



KENT T. SCOTT  
President and Chief Operating Officer

November 16, 2000

Mr. Harold Camden  
Principal Maintenance Inspector  
Federal Aviation Administration  
4240 Airport Road  
Cincinnati, Ohio 45226

Dear Mr. Camden:

Following are the answers to the questions you asked in your letter to me dated October 25, 2000:

- *How will maintenance control address chronic write-ups, DMI's, and troubleshooting problems?*

Chronic teams have been established that monitor reliability notices and log book entries. Three (3) log book entries in any ten (10) day period for a similar malfunction requires corrective measures.

- *How does maintenance control and reliability interface? How does maintenance control know daily what repeat write-ups exist, and how is this interfaced with reliability on a daily basis? What is the common connection between these two organizations?*

Maintenance control and Reliability interface daily with Engineering Action Notices and communication of corrective actions taken. The Chronic teams are also involved in this process.

- *What is the breakdown of the 8 AMT DC-10 experts? Who will be at the maintenance control desk, who will be at the out stations, and what stations? What will be the coverage of these experts at both locations?*

We have employed AMT to place their representatives in San Jose, CA, Dayton, Ohio, and Venice, Italy. Two (2) of these three (3) experts handle hands-on maintenance training functions, and the third is our representative monitoring the conversion process of our last DC-10. The remaining five (5) are assigned to Maintenance Control on varying shifts.

Mr. Harold Camden

November 16, 2000

Page 2

- *How will the OJT be accomplished and documented? What specific training will be accomplished and at what station?*

DC10 familiarization OJT is currently being accomplished by AMT in Dayton and San Jose. We are exploring the possibility of using additional AMT experts at other Emery DC-10 locations in the very near future. The training program consists of leading our mechanics through trouble shooting procedures as problems arise and therefore the content is not documented. The documentation of training hours completed by individuals is available for your review.

- *How will Dick Funk perform these technical support duties? When and where will this function take place and for how long? Will he perform audits to determine unsatisfactory procedures and how will these be resolved once determined?*

Mr. Funk has performed extensive audits of EWA functions and processes and has identified our strengths and weaknesses in a report he presented to Emery on October 27, 2000. Mr. Funk's findings were communicated to EWA and action plans have been developed to address each area requiring improvement. Mr. Funk will follow-up with periodic visits to review our processes and make additional recommendations as required.

In response to Mr. Funk's recommendations and your input, we have formed a DC-10 reliability team headed by Dave Ungemach from our Line Maintenance organization. The team meets weekly to review progress regarding open action items, and to identify new problems for action. Minutes of these meetings are available for your review.

- *Where did the 10 permanent EWA employees come from to staff maintenance control? Are these positions now left vacant? Are these 10 positions filling the new Fleet Surveillance Desks in maintenance control?*

These positions are currently being filled by Out Station Mechanics who are not currently required at their assigned locations as these stations are currently being serviced by contractor aircraft. These mechanics are staffing two (2) DC-8 and one (1) DC-10 Surveillance Desks. Permanent replacements for these positions will be forthcoming as we find qualified candidates.

- *What will the 3 contract consultants do in the Engineering Department? How will they help resolve the DC-10 chronic repeat write-up problem? What will the two (2) permanent engineering positions be for? How will this help the DC-10 write-up problem?*

Mr. Harold Camden  
November 16, 2000  
Page 3

There are currently two (2) contract consultants. One (1) working on DC-8 issues and the other working on the installation of DC10-10 Smoke Detectors in the lower aft cargo compartments. This gives our analysts and engineers more time to focus on the immediate requirements for DC10 and DC8 reliability improvement. We are continuing our search for qualified candidates to fill the two vacant engineering positions to further alleviate the workload occupying our present staff. We are looking for candidates with backgrounds in structures, flight controls and or avionics.

The DC-10 reliability team further aids our engineering and reliability personnel with its focus on identifying and curing chronic problems.

- *Prior staffing positions left blank?*

These positions remain unfilled based on the shortage of qualified candidates to fill the positions. We are continuing to search for qualified replacements.

- *"B" Check station inspectors.*

We have located and interviewed candidates for these positions and are in the formal job offer process.

As you can see we have made considerable progress to correct the problem areas your team has pointed out to us and we continue to make significant improvements to our DC10 operation. We invite you to review our reliability statistics that are clear evidence of the progress we are making in managing our DC10 Fleet as a result of our recent actions.

We are constructing an action plan, with milestones to review with you. This action plan will include RASIP findings as well as action items generated by the DC-10 reliability team. We expect to have the action plan completed by Wednesday, November 22, 2000.

Sincerely,



Kent T. Scott

cc: Jerry Trimarco  
Jim Owens

Robert Doll  
Dan Kirkpatrick

Andy Granuzzo  
Ed Jones

EWA'S RESPONSE TO  
LETTER DATED  
October 3, 2000



U. S. Department  
of Transportation

Federal Aviation  
Administration

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226

Date August 3, 2000

Mr. Tom Wood  
Sr. Director Quality Control  
Emery Worldwide Airlines  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Wood,

After final review of the procedures as outlined in the Maintenance Policy and Procedures Manual, we will accept the new Maintenance Carryover Item Procedure (MCI). These procedures are outlined on pages 17, 18, and 19 in Chapter 3 of the Maintenance Policy and Procedures Manual.

If you have any questions, please call me at [REDACTED]

Sincerely,

A handwritten signature in cursive script, which has been partially obscured by a black redaction bar.

Harold R. Camden  
Principal Maintenance Inspector

# EMERY WORLDWIDE AIRLINES MAINTENANCE POLICY & PROCEDURES MANUAL

## IV. MAINTENANCE CONTROL

### A. General

The Maintenance Control Section has been established to track all aircraft movement throughout the system and keep an accurate status of all maintenance discrepancies. In order to maintain an accurate status, the Controller is required to establish a continual communication link among EWA Line Maintenance, Maintenance Contractors, and/or Flight Crews. Maintenance Control is responsible for providing technical support to all.

Should it become apparent that the aircraft will not be completed in time for the scheduled flight, Maintenance Control shall be immediately advised of the estimated time of completion by the Line Maintenance Supervisor/Manager or the Flight Crew.

In every case, Operations shall be advised if a delay will be involved. In the event the estimated time of completion changes during the delay, the Maintenance Control Section must keep Operations advised of these changes.

### B. Procedures

Maintenance Control procedures are referenced in this manual corresponding with the applicable procedures that involve their participation.

### C. Maintenance Carryover Item Procedure (MCI)

#### 1. Policy

It is EWA's policy to maintain its aircraft to the highest standard of airworthiness. In order to maintain departure schedules, it is sometimes necessary that maintenance personnel carryover minor defects which do not affect safety or airworthiness and are not a MEL/CDL placardable item.

EWA's Maintenance Carryover Item (MCI) policy and procedure provides management and control of items not covered in the MEL/CDL, and do not effect the airworthiness of the aircraft.

MCI items are those that have no airworthiness connotations, such as reading lights, window shades, galley equipment or cabin convince items. Non-airworthy items of this type may be made MCIs without referencing approved/accepted data. While these items do not fall into the requirements of the MEL/CDL, EWA has developed a means to ensure that these items are corrected in a timely manner.

Non-airworthy MCIs will be corrected at the next scheduled A, B, or C Check, whichever comes first.

**Accepted**  
**CVG FSDO**



## EMERY WORLDWIDE AIRLINES MAINTENANCE POLICY & PROCEDURES MANUAL

### 2. MCI Procedures

The Maintenance Control Shift Manager must approve all Maintenance Carryover Items (MCI). Once a MCI item is initiated, a print out of the computerized MCI tracking and planning control system screen (MCI Status) will be made. The Maintenance Control shift Manager and controller will initial this print out in the upper right-hand corner. This print out will then be placed in the applicable tail number assigned book.

**Note:** MCI items will be coded first digit with the letter "N".

The procedure for a MCI item is as follows:

In determining the safety and airworthy status of a discrepancy, the following publications are available and will be used as to the effect and/or implications of the MCI's.

1. MEL      Appropriate Minimum Equipment List.
2. CDL      Appropriate Configuration Deviation List.
3. M/M      Appropriate Maintenance Manual including STC and
4.            OEM.
5. SRM      Appropriate Structural Repair Manual
6. MPP      EWA Maintenance Policy & Procedure Manual

For items other than those listed in this procedure the responsibility for determining the safety and airworthiness status of the discrepancy rests with the mechanic, lead mechanic, or supervisor requesting MCI with Maintenance Control providing final approval using approved/accepted data limitations.

### 3. MCI generated as a result of A or B Check/Inspection.

Discrepancies generated and recorded as a result of A or B check/inspection requirement may be placed on a MCI for correction/repair at the next scheduled check/inspection provided the discrepancy falls into one of the following items:

- a. Equipment items that are non-essential to the continued airworthiness of the aircraft, i.e. crew or courier comfort items (EXCEPT THE TRASH RECEPTACLE INTEGRITY FOR CONTAINING POSSIBLE TRASH FIRES), air conditioning distribution items such as air outlets, etc.
- b. Minor defects such as dented skin (provided internal inspection has ascertained no damage has resulted to frames, stringers, attachments, etc.) that are within the limits of the manufacturer's manuals.

**Note:** The manual or approved/accepted data must be indicated in the corrective action sign off.

**Accepted**  
**CVG FSDO**

**EMERY WORLDWIDE AIRLINES  
MAINTENANCE POLICY & PROCEDURES MANUAL**

- c. Modifications items (such as, partial installation) that do not affect the airworthiness of the aircraft.
- d. Appearance items such as cleaning, painting, or interior trim conditions (except interior trim that may cause injury if contact is made by an individual or trim conditions that may interfere with the proper operation of seats, exits, or other emergency equipment).

4. MCI Log Book Procedures

- a. Obtain a MCI control number from Maintenance Control for the MCI item and enter a statement in the Corrective Action block of the aircraft log:
  - Non-Airworthy items: Assigned MCI Control Number \_\_\_\_\_
  - Approved/Accepted data limitations: Enter a Corrective Action statement along with the approved/accepted data reference number (ie Maintenance Manual Limitation Reference), and the MCI assigned control number \_\_\_\_\_
- b. The mechanic will enter the MCI item into the Non-MEL section of the log book.

**Note:** The NON-MEL section of the log book will be revised to reflect MCI on an attrition basis.

- c. When a MCI item is entered in the Log Book Discrepancy/ CORRECTIVE ACTION block, for temporary replacement of a Rigid Hydraulic Tubing with a flexible hose, a material requisition number for the part on order or to be manufactured, will be provided to Maintenance Control.

**Accepted**  
**CVG FSDO**  
*Handwritten Signature*  
8-3-2000



September 8, 2000

Mr. Jim Franklin  
EWA Assistant PMI  
Federal Aviation Administration  
4240 Airport Rd.  
Cincinnati, OH. 45226

Mr. Franklin:

Please accept this letter as my response to your letter concerning Emery Worldwide Airlines (EWA) aircraft manual procedures pertaining to temporary replacement of rigid hydraulic tubing with flexible hose on EWA aircraft.

Attached is a proposed revision to the EWA Aircraft Maintenance Manual, Chapter 7. This revision will clarify the inspection criteria for the flexible hoses that are installed as a temporary replacement. A revision to the "B" Check work cards is also being proposed to cover this issue.

The temporary flexible hoses are currently replaced by rigid tubing at each scheduled maintenance check/inspection (C or D Check). This policy is per Maintenance Policy and Procedure (MPP) Manual, Chapter 3, page 30, item 3. The proposed revision (attached) also clarifies this policy.

Boeing/Douglas aircraft Maintenance Manual temporary revision 20-3 and AC 43.13-1b do not limit the number of flexible lines that can be installed on an aircraft.

I hope you find my response and recommended changes to procedures satisfactory. Thank you for your anticipated consideration and cooperation in this matter.

attachments

Sincerely,

A handwritten signature in black ink, which appears to be "Edward B. Jones, Jr.", written over a black rectangular redaction box.

Edward B. Jones, Jr.  
Manager Quality Control

cc: Thomas M. Wood



U. S. Department  
of Transportation

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226

Federal Aviation  
Administration

August 2, 2000

Mr. Edward Jones  
Manager, Quality Control  
Emery Worldwide Airlines  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Jones,

On July 12, 2000, it was determined during a ramp inspection of N801GP that a flexible line was installed on June 9, 2000, in place of a rigid hydraulic line. Maintenance Control confirmed this line to be installed.

I met with you on July 26, 2000 and asked what inspection criteria was in place as outlined on page 1, chapter 7 of the Emery Worldwide Airlines Aircraft Maintenance Manual. Your indication was none known at that time.

Please explain what procedure is currently used for inspection of flexible line installation, how many can be installed on each aircraft, and at what inspection period down the road would these flexible line be replaced with the original rigid lines.

If this issue is going to require a manual revision, please give us the change that would be needed to assure a proper procedure is followed.

If you have any questions, please call me at [REDACTED]

Sincerely,

Jim Franklin  
Assistant Principal Maintenance Inspector



August 30, 2000

Mr. Jim Franklin  
Assistant Principal Maintenance Inspector  
Flight Standards District Office  
4240 Airport Road  
Cincinnati, OH 45226

Ref: Your letter dated August 2, 2000

Dear Mr. Franklin:

Please accept this letter as my initial response to your letter concerning Emery Worldwide Airlines (EWA) Aircraft Maintenance Manual procedure pertaining to temporary replacement of rigid hydraulic tubing with flexible hose on EWA aircraft.

As I discussed with you yesterday, August 29, 2000, I informed you that we were currently revising the above mentioned procedures to reflect the approved Douglas Aircraft Company Maintenance Manual Temporary Revision 20-13.

Hopefully, my response to your letter and my recommended changes to these procedures that I will provide to you sometime next week will put closure to your concerns.

Thank you for your anticipated consideration and cooperation in the matter.

attachment

Regards,

A handwritten signature in black ink, which appears to be "Edward B. Jones, Jr.", written over a solid black rectangular redaction box.

Edward B. Jones, Jr.  
Manager Quality Control

cc: Thomas M. Wood

lc

# EMERY WORLDWIDE AIRLINES

## Request for Manual/Publication Revision

No. \_\_\_\_\_

       ERROR     SUGGESTION FOR CHANGE (check appropriate space) DATE 1<sup>st</sup> AUGUST 2000

MANUAL/PUBLICATION TITLE E.W.A. A.M.M., EWA IPM Vol 1

CHAPTER/SECTION/PAGE REFERENCE Chap 7, p 1 / B Check PARAGRAPH \_\_\_\_\_

DESCRIPTION OF ERROR OR SUGGESTED CHANGE
<p>Procedures for inspecting flexible hoses installed as temporary replacements for rigid tubing needs to be described in the Aircraft Maintenance Manual (Chap 7 p 1) and also on B of the B Check cards (all). An inspection limitation is required for a covered check.</p>
<p>Checks and diagrams in AMM Chap 7 require revision as AC 43.13 (referenced material) has been revised.</p>
<p>Ref EWA AMM Chap 7 p 1 item B4 delete last sentence in para due to past problems this is not an acceptable means for ensuring hose integrity. The hose must be tested with approved equipment to determine if it will withstand 3,000 psi service pressure after hose specs are verified.</p>
<p>See attached for proposed changes.</p>

Name Simon Chanell Signature [Signature]

Station Location ADAY DC Phone 415-7816

[Signature]  
Manager Approval

[Signature]  
Director of Engineering Approval

Director Maint. Approval

[Signature]  
Director of Quality Control Approval

- Instructions:
1. Attach drawings, sketches, diagrams, etc.
  2. Forward to Director of Engineering

MRB Approval Required (Check One)  YES  NO Mgr. Of Reliability \_\_\_\_\_

**EMERY WORLDWIDE AIRLINES  
AIRCRAFT MAINTENANCE MANUAL**

**HYDRAULIC**

**I. TEMPORARY REPLACEMENT OF RIGID HYDRAULIC TUBING WITH FLEXIBLE HOSE**

**A. Policy**

1. EMERY WORLDWIDE AIRLINES, based on Douglas temporary revision 20-3 and AC 43.13-1B, allows temporary replacement of rigid hydraulic lines with flexible hoses **ONLY** when the procedures listed below are followed.
2. The Senior Maintenance Representative, or Shift Foreman, and the individual signing the airworthiness release is responsible to ensure that these procedures are followed.
3. **INSTALLATION OF FLEX HOSES REQUIRE RII BUY-OFF.**

**B. Procedure**

The following procedure will be used as a guideline to insure proper installation of flexible hoses.

NOTE: Hoses may be used in place of pipe segments or complete assemblies to facilitate proper repair when original pipe shapes cannot be obtained or duplicated. If a hose is to connect directly to a pipe segment, install appropriate pipe fitting, such as a swaged flareless adapter, as outlined in the Douglas Aircraft Maintenance Manual.

NOTE: Hydraulic hose assemblies may be used to replace an entire rigid pipe assembly or a segment of rigid pipe assembly when the original pipe shapes cannot be obtained or duplicated. If a hose is to connect directly to a pipe segment, install the appropriate end fittings as outlined in Manufacturers Maintenance Manual.

NOTE: Hose restrictions are as follows:

1. Coiled tubing may not be replaced by a hose assembly without specific approval from McDonnell Douglas Aircraft.

1. Open a discrepancy item on the aircraft log page to record the compliance of the following steps.
2. Contact Maintenance Control for guidance and to insure that the installation of the flex hose is recorded on the Maintenance Carryover Item (MCI) Deferred List.

**EMERY WORLDWIDE AIRLINES  
AIRCRAFT MAINTENANCE MANUAL**

3. The temporary replacement flexible hose will be inspected for condition and security at each "B" Check inspection.

The temporary replacement hose will be replaced with rigid hydraulic tubing at the next "C" or "D" Check, whichever comes first.

4. Ensure that the flexible hose meets the temperature, pressure, and fluid type requirements of the original rigid tube.

- a. Typical aircraft hose specifications and their uses are shown on page 3.

- b. Reference the Hydraulic System Approved Teflon Line Hose Assembly Substitution Section of this Chapter.

5. The length of the flexible hose may need to be longer than the original rigid tube, since there are minimum bend radii.

- a. Install hose assembly without twisting.

- b. Never stretch a hose tight between two fittings. The length of hose should be sufficient to provide about 5 to 8 percent slack.

- c. Never exceed the minimum bend radii listed on page 5.

- d. All flexible hose installations should be supported at least every 24 inches. Close supports are preferred. They should be carefully routed and securely clamped to avoid abrasion, kinking, or excessive flexing.

6. Insure that the flex line is properly secured and not obstructing any moving parts.



TABLE 9-3. Aircraft hose specifications.

**SINGLE WIRE BRAID FABRIC COVERED**

MIL. PART NO.	TUBE SIZE O.D.	HOSE SIZE I.D.	HOSE SIZE O.D.	RECOMM. OPER. PRESS.	MIN. BURST PRESS.	MAX. PROOF PRESS.	MIN. BEND RADIUS
MIL-H-8794- 3-L	3/16	1/8	.45	3,000	12,000	6,000	3.00
MIL-H-8794- 4-L	1/4	3/16	.52	3,000	12,000	6,000	3.00
MIL-H-8794- 5-L	5/16	1/4	.58	3,000	10,000	5,000	3.38
MIL-H-8794- 6-L	3/8	5/16	.67	2,000	9,000	4,500	4.00
MIL-H-8794- 8-L	1/2	13/32	.77	2,000	8,000	4,000	4.63
MIL-H-8794-10-L	5/8	1/2	.92	1,750	7,000	3,500	5.50
MIL-H-8794-12-L	3/4	5/8	1.08	1,750	6,000	3,000	6.50
MIL-H-8794-16-L	1	7/8	1.23	800	3,200	1,600	7.38
MIL-H-8794-20-L	1 1/4	1 1/8	1.50	600	2,500	1,250	9.00
MIL-H-8794-24-L	1 1/2	1 3/8	1.75	500	2,000	1,000	11.00
MIL-H-8794-32-L	2	1 13/16	2.22	350	1,400	700	13.25
MIL-H-8794-40-L	2 1/2	2 3/8	2.88	200	1,000	300	24.00
MIL-H-8794-48-L	3	3	3.56	200	800	300	33.00

**Construction:** Seamless synthetic rubber inner tube reinforced with one fiber braid, one braid of high tensile steel wire and covered with an oil resistant rubber impregnated fiber braid.

**Identification:** Hose is identified by specification number, size number, quarter year and year, hose manufacturer's identification.

**Uses:** Hose is approved for use in aircraft hydraulic, pneumatic, coolant, fuel and oil systems.

**Operating Temperatures:**  
Sizes-3 through 12: Minus 65 °F. to plus 250 °F.

Sizes - 16 through 48: Minus 40 °F. to plus 275 °F.

**Note:** Maximum temperatures and pressures should not be used simultaneously.

**MULTIPLE WIRE BRAID RUBBER COVERED**

MIL PAR NO.	TUBE SIZE O.D.	HOSE SIZE I.D.	HOSE SIZE O.D.	RECOMM. OPER. PRESS.	MIN. BURST PRESS.	MIN. PROOF PRESS.	MIN. BEND RADIUS
MIL-H-8788- 4-L	1/4	7/32	0.63	3,000	16,000	8,000	3.00
MIL-H-8788- 5-L	5/16	9/32	0.70	3,000	14,000	7,000	3.38
MIL-H-8788- 6-L	3/8	11/32	0.77	3,000	14,000	7,000	5.00
MIL-H-8788- 8-L	1/2	7/16	0.86	3,000	14,000	7,000	5.75
MIL-H-8788-10-L	5/8	9/16	1.03	3,000	12,000	6,000	6.50
MIL-H-8788-12-L	3/4	11/16	1.22	3,000	12,000	6,000	7.75
MIL-H-8788-16-L	1	7/8	1.50	3,000	10,000	5,000	9.63

**Hose Construction:** Seamless synthetic rubber inner tube reinforced with one fabric braid, two or more steel wire braids, and covered with a synthetic rubber cover (for gas applications request perforated cover).

**Identification:** Hose is identified by specification number, size number, quarter year and year, hose manufacturer's identification.

**Uses:** High pressure hydraulic, pneumatic, coolant, fuel and oil.

**Operating Temperatures:**  
Minus 65 °F. to plus 200 °F.

September 8, 2000  
Revision 19  
Page 9-22

Chapter 9  
Page 3  
Page 9-30

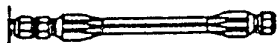
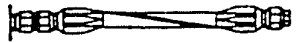
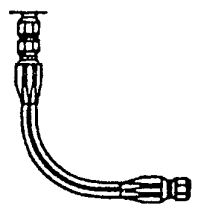
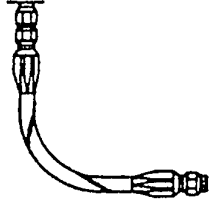
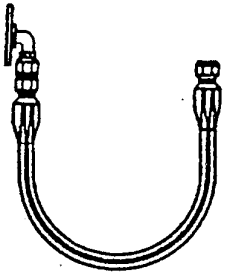
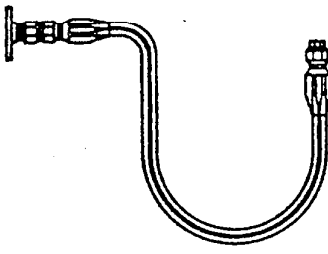
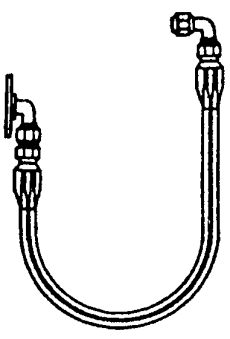
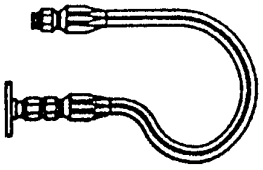
RIGHT WAY	WRONG WAY	
		<p>Do not bend or twist the hose as illustrated.</p>
		<p>Allow enough slack in the hose line to provide for changes in length when pressure is applied. The hose will change in length from + 2% to - 4%.</p>
		<p>Metal end fittings cannot be considered as part of the flexible portion of the assembly.</p>
		<p>The use of elbows and adapters will ensure easier installation and in many installations will remove the strain from the hose line and greatly increase service life.</p> <p>At all times keep the minimum bend radii of the hose as large as possible to avoid tube collapsing.</p>

FIGURE 9-9. Proper hose installations.

September 8, 2000  
 Revision 19  
 Per 9-30

Chapter 7  
 Page 4  
 Page 9-29

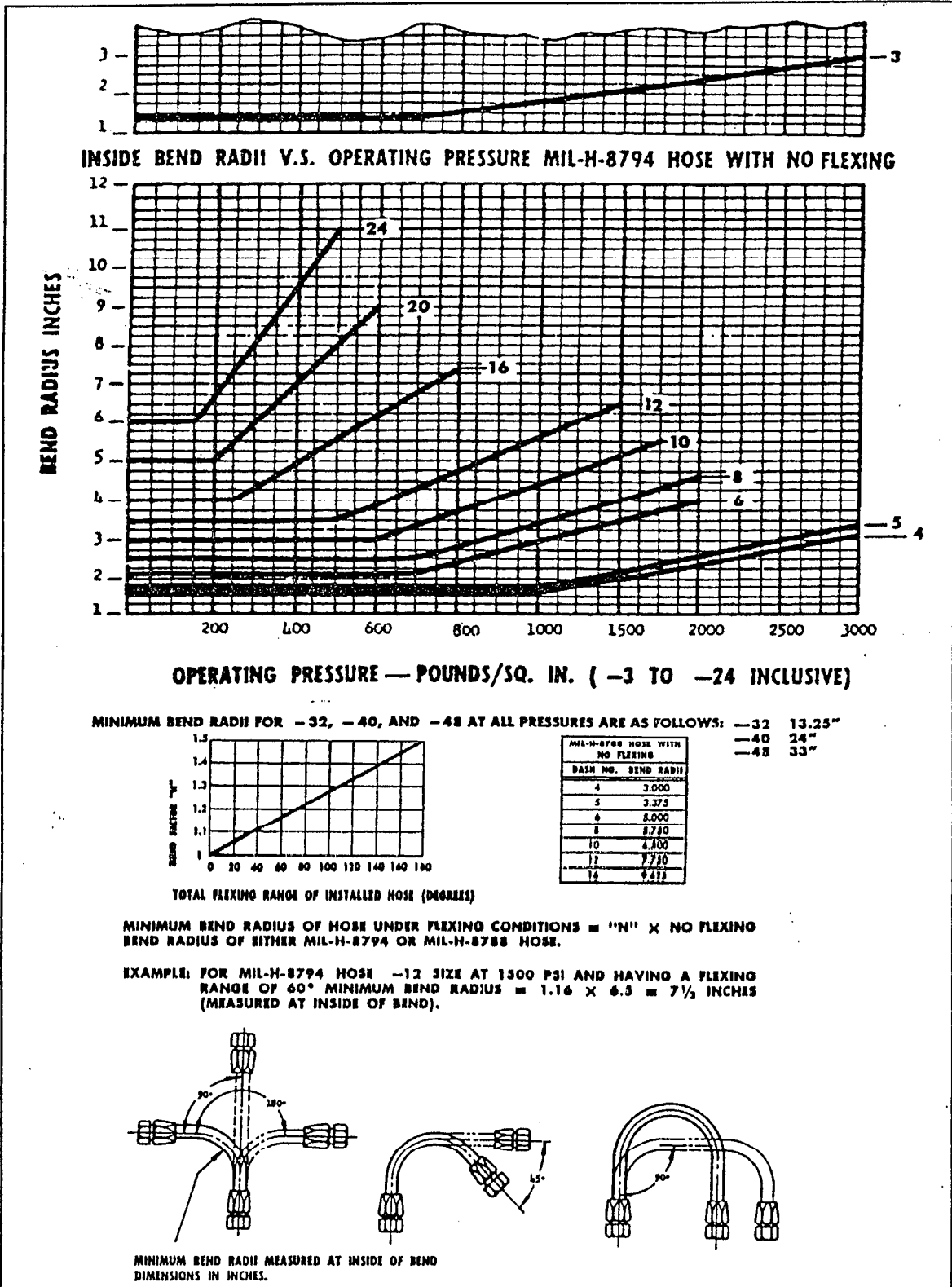


FIGURE 9-10. Minimum bend radii.

Page 9-24 September 8, 2000  
Revision 19

Chapter 7  
Page 5  
Para 9-30

TABLE 9-4. Ball diameters for testing hose restrictions or kinking.

HOSE SIZE	BALL SIZE
-4	5/64
-5	9/64
-6	13/64
-8	9/32
-10	3/8
-12	1/2
-16	47/64
-20	61/64

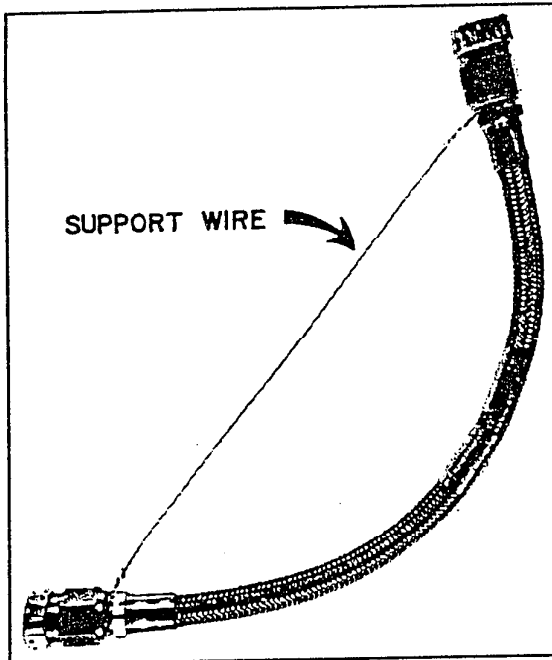


FIGURE 9-11. Suggested handling of preformed hose.

9-31.—9-36. [RESERVED.]

September 8, 2000  
 Revision 19  
 PAR 9-30

Chaplen ?  
 Page 6  
 Page 9-25 (and 9-26)

EMERY WORLDWIDE AIRLINES  DC-8	REV. DATE 9/7/99	REV. NO. 1	PAGE NO. 1 OF 1	ISPEC. CK B-1	CARD NO. B001
				ACFT. NO.	STATION
INSTRUCTIONS				SIGN-OFF MECHANIC ONLY	

1. UPON ARRIVAL

1.

- a. Park aircraft and secure as required according to the Douglas Maintenance Manual Chapter 10 "Parking Maintenance Practices." Install landing gear locking pins. Open main landing gear doors using door manual open control valve, located in left main gear wheelwell. Electrically ground aircraft to approved grounding points.

**Note:** Verify that ground power unit voltage reads 110 to 120 VAC, and frequency is 380-420 HERTZ. Connect ground power.

- b. Position switches as follows:

1. Emergency Lights .....OFF
2. Emergency Light Not Armed.....ILLUMINATED
3. Air Conditioning.....OFF
4. Battery-External Power.....EXTERNAL POWER
5. Galley Power.....OFF

- c. Open the following circuit breakers:

1. Engine ignition
2. Ignition P.S. Control
3. Ignition and Tach Power Supply
4. Thrust Reverse Emergency Stow
5. Reverse Thrust
6. Longitudinal Trim
7. Blow away Jet Pump (60 Series)
8. Standby Attitude Indicator
9. Air Conditioning Pack Trip

**WARNING:** INADVERTENT OPERATION OF THRUST REVERSERS COULD CAUSE SERIOUS INJURY TO PERSONNEL WORKING IN ENGINE AREA:

- d. Review log book and discrepancies with flight crew and take corrective action on open discrepancies.

- e. Review open deferred maintenance items and verify time limits and due dates with Maintenance Control and take necessary action. *INSPECT THE CONDITION AND SECURITY OF ALL FLEX HYDRAULIC HOSES INSTALLED AS TEMPORARY REPLACEMENTS FOR RIGID HYDRAULIC TUBING.*

- f. Engage gust lock mechanism, close oxygen shutoff valves.

**WARNING:** CLEAR AIRCRAFT OF OBSTACLES AND PERSONNEL PRIOR TO LOWERING FLAPS:

- g. Extend Wing Flaps and ground spoilers.

**Note:** Perform applicable Powerplant/Nacelle Inspection work cards as per type of powerplant installed.

4. Approved Repair

A. Repair Piping

- (1) Select type of repair required (Ref. paragraph 3.).

NOTE: A new dual swage union must be in a location that will allow the swage tool to clear any piping bend radius or other obstruction.

- (2) All new piping segments to be installed must be same diameter and material as original piping.

NOTE: Piping with wall thickness for high pressure hydraulic lines may be used for repair of hydraulic return and other low pressure system lines if the thinner wall material is not available.

NOTE: Prebrazed piping repair segments are furnished with wall thickness for high pressure hydraulic lines to prevent inadvertent use of thinner wall material.

NOTE: New piping segments must be cleaned prior to installation.

NOTE: Hoses may be used in place of pipe segments or complete assemblies to facilitate proper repair when original pipe shapes cannot be obtained or duplicated. If a hose is to connect directly to a pipe segment, install appropriate pipe end fitting, such as a swaged flareless adapter, as outlined in this chapter. Observe maintenance practices for hose installation as outlined in chapter 20-12-0.

NOTE: Hydraulic hose assemblies may be used to replace an entire rigid pipe assembly or a segment of rigid pipe assembly when the original pipe shapes cannot be obtained or duplicated. If a hose is to connect directly to a pipe segment, install the appropriate end fittings as outlined in chapter 20-12-0.

NOTE: Hose restrictions are as follows:

1. Coiled tubing may not be replaced by a hose assembly without specific approval from McDonnell Douglas Aircraft.

Feb 22/89

Temporary Revision 20-3, Page 11 of 51

20-12-2

DOUGLAS AIRCRAFT CO., INC.  
**DC-8 SIXTY SERIES**  
 MAINTENANCE MANUAL

TEMPORARY  
 REVISION

2. Hose assemblies must be approved for use in phosphate ester hydraulic systems and approved for pressure in that application.
  3. Hose assemblies must be periodically inspected for condition and security at intervals no greater than every "C" Check until hose assemblies are replaced with rigid tube assemblies.
  4. Replacement of hose assemblies should be scheduled for the next convenient maintenance period.
  5. The length of the replacement hose assembly should be approximately the same length of the pipe segment or entire pipe assembly which is being replaced.
- (a) Steel tubing - CRES, 21Cr-6NI-9Mn or 304-1/8 hard.

O.D. Tube Size Inch	CRES, 21Cr-6NI-9Mn						Other Systems (except water)	
	Hydraulic Piping			Return			Wall	
	MM	Pressure Wall Inch	MM	Return Wall Inch	MM	Inch	MM	
1/4	6.35	.016	0.41	.016	0.41	.016	0.41	
5/16	7.94	.016	0.41	.016	0.41	.016	0.41	
3/8	9.53	.020	0.51	.016	0.41	.016	0.41	
1/2	12.7	.026	0.66	.016	0.41	.016	0.41	
5/8	15.8	.033	0.84	.016	0.41	.016	0.41	
3/4	19.05	.039	0.99	.016	0.41	.016	0.41	
1	25.4	.052	1.32	.020	0.51	----		
1 1/4	31.75	----		.024	0.61	----		



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Flight Standards District Office  
4240 Airport Road  
Cincinnati, Ohio 45226  
[REDACTED]

October 18, 2000

Mr. Edward Jones  
Manager of Quality Control  
Emery Worldwide Airlines  
One Emery Plaza  
Dayton International Airport  
Vandalia, Ohio 45377

Dear Mr. Jones,

I have received your response to the letter, dated August 29, 2000, involving flexible line installation, tracking, and inspection on Emery Worldwide Airlines Aircraft.

On September 28, 2000, we discussed the process in which these lines were tracked and inspected. Along with the procedures currently used in the Emery Worldwide Airlines Aircraft Maintenance Manual, you also explained the log sheet follow-up review and the Quality Control Communications with Maintenance Control on inspection of the flexible line installations. This process was inline with the procedures as outlined in the Maintenance Manual.

On October 4, 2000, I received the DRAFT revision to the Emery Worldwide Airlines Aircraft Maintenance Manual regarding the added procedures for insuring line inspection and tracking. Please formalize this revision for acceptance into the manual.

Please contact me so we can formally accept this revision involving the above mentioned issues.

Sincerely,

  
[REDACTED]  
Harold R. Camden  
Principal Maintenance Inspector



EWAS RESPONSE TO LETTER DATED  
March 3, 2000



March 28, 2000

Mr. Harold Camden  
*EWA PMI*  
4240 Airport Rd.  
Cincinnati, OH 45226

Dear Mr. Camden:

This is a follow-up letter to the Facsimile you received from Thomas M. Wood, dated March 21, 2000, regarding the carriage of spare wheels and brakes in the lower cargo compartments.

Emery Worldwide Airlines (EWA) has taken a proactive role to address your recommendations in this area. EWA Engineering Department has drafted an E.O. to install tie downs in the forward side of "C" and the aft side of "A" lower cargo compartments to accommodate these spare wheels and brakes. This E.O. is currently being reviewed by a DER for approval. The installation of these tie downs will begin on, or before, April 10, 2000.

As you have concurred, EWA may continue to follow current written Maintenance Policy and Procedures pertaining to carrying spare wheels and brakes until the aforementioned E.O. has been accomplished, in which time we will start using these added tie downs.

I trust that this proactive response by EWA will address all your recommendations in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward B. Jones, Jr.", written over a solid black rectangular redaction bar.

Edward B. Jones, Jr.  
*Manager Quality Control*

cc: Rene' P. Visscher  
Thomas M. Wood  
David W. Ungemach  
Tracy L. Chaplin

EWA'S RESPONSE TO  
LETTER DATED  
March 14, 2000

### **Finding 1.9.2 Control of Forms**

The types of records used to track the various required areas of training and operation change frequently. The forms do not indicate if they have been reviewed or "Approved" by the Federal Aviation Administration. All approved forms should be placed in an approved manual, and then controlled. This is contrary to guidance contained in Manual 8400.10 page 3-253, paragraph 467 (B).

### **Emery Response**

Category C. Systemic deficiencies that could cause non-compliance with regulatory requirements.

Flight crew member training forms are contained in chapter 11 of the Emery Training Manual. This manual is an approved document evidenced by the previous POI's signature on the list of effective pages under the statement "INITIAL APPROVAL". This method of approval is consistent with guidance contained in FAA Order 8400.10, Vol. 3, Chapter 15, Section 5, paragraph 2109 (A) (3).

2109. PHASE FIVE: GRANTING FAA APPROVAL. Phase five consists of the POI granting FAA approval to manuals, manual sections, and checklists. During this phase the POI must formally notify the operator of the approval and also complete a specific record of the approval. For manuals, manual sections, and Part 135 aircraft operating checklists which are not required to have FAA approval, written notification of acceptance is not required and shall not be given (see paragraph 2099 of this section).

A. Notification of Approval. When the POI decides to approve a document, manual, manual section, or checklist, the following procedures apply:

For a document, manual, or checklist that contains page control sheets, the POI shall annotate both copies of the page control sheets with the phrase "FAA Approved." Under the words "FAA Approved," POIs shall enter the effective date of approval and sign both copies. The operator may preprint the words "FAA Approved" and blank lines for the date and signature on the page control sheets or the POI may use a stamp to add the approval annotation on each sheet.

### **Summary of Finding 1.9.2**

#### **Control of Forms**

No finding justified.

Forms in use at Emery are contained in the FAA Approved Training Manual, chapter 11.

### **Finding 1.9.3 Tracking of Consolidation of Knowledge**

Emery is not tracking consolidation of knowledge times. Crews are required to track their times and notify the company if they are going to have difficulty flying the required time prior to cutoffs. The present "Accepted" system needs to be amended to require Emery to track this requirement. CFR 14 121.683 a9s) (1) requires the company to maintain current records of this requirement.

EWA'S RESPONSE TO  
LETTER DATED

April 17, 2000

APR 24 2000



U.S. Department  
of Transportation  
Federal Aviation  
Administration

DETROIT FLIGHT STANDARDS  
DISTRICT OFFICE

Willow Run Airport - East Side  
8800 Beck Rd.  
Belleville, Michigan 48111

April 17, 2000

CERTIFIED RETURN-RECEIPT

File No. 2000GL230092

Mr. Kent T. Scott  
Emery Worldwide Airlines, Inc.  
One Emery Plaza  
Dayton International Airport  
Vandalia, Ohio 45377

*8030-2.00*

*JRC - JRC  
SK - [initials]  
ES - [initials]  
LK - [initials]  
File*

Dear Mr. Scott:

Personnel of this office are investigating insufficient documentation in conjunction with the revenue operation of a DC-8-73F, N791FT, into Dayton, Ohio (DAY). On April 12, 2000, Inspectors from this office were conducting a cargo off load inspection when a pallet lock was discovered missing in position #15. There appears to be no record of this missing equipment. If the facts are as they appear, this action was contrary to the Federal Aviation Regulations.

This letter is to inform you that this matter is under investigation by the Federal Aviation Administration. We would appreciate receiving any evidence or statements you might care to make regarding this matter within 15 days of receipt of this letter. Any discussion or written statements by you will be given consideration in our investigation. If we do not here from you within the specified time, our report will be forwarded without the benefit of your statement.

Sincerely,

*[Handwritten signature]*

William E Takala  
Aviation Safety Inspector

CC: Harold R. Camden  
GL05-CVG FSDO

*(22)*

*8030-2.00*



May 5, 2000

Mr. William E. Takala  
Aviation Safety Inspector  
Federal Aviation Administration  
Willow Run Airport - East Side  
8900 Book Rd.  
Belleville, Michigan 48111

Subject: File No. 2000GL230092

Dear Mr. Takala:

I am writing regarding the above referenced LOI of April 17, 2000 which was received on April 27, 2000..

This LOI is in regard to your inspection of April 12, of aircraft N791FT in which, after off load, you discovered that a pallet lock was missing in position #15.

Mr. Takala, Emery Worldwide Airlines does have a Maintenance Log entry for this aircraft on March 30, 2000, in Fort Lauderdale, indicating that there was a loose lock and a lock out of position in position #15 on this aircraft and that corrections were made. There are no further Log entries for removal of a lock in this position even on the day you conducted your inspection.

While a missing lock, according to the Douglas DC-8 Maintenance Manual, is acceptable and not a Safety concern, I question why the missing lock you discovered was not reported to Emery Worldwide Maintenance so that a Log entry could be made and corrective action taken.

Mr. Takala, we acknowledge that the missing Log entry is a procedural violation and we are attempting to find the reason for this omission. However, based on the fact that one missing lock is acceptable and not a matter of safety, we respectfully request that this Letter of Investigation be closed with no action.

Sincerely,



Jim Owens

Director ULD Management

EWAS RESPONSE TO  
LETTER DATED

April 26, 2000





U.S. Department  
of Transportation  
  
Federal Aviation  
Administration

Flight Standards District Office  
8303 West Southern Avenue  
Indianapolis, Indiana 46241

MAY 1 - 2000

April 26, 2000

CERTIFIED MAIL—RETURN RECEIPT REQUESTED  
File No. 2000GL110070

Mr. Kent T. Scott  
Emery Worldwide Airlines, Inc.  
One Emery Plaza/ Dayton International Airport  
Vandalia, Ohio 45377

8030-2.00

Dear Mr. Scott:

Personnel of this office are investigating the use of an outdated Aircraft Loading Manual, which involved the ground operations at Logan International Airport (BOS), Boston, Massachusetts. On March 31, 2000, a facility inspection check was conducted on East Coast Airport Services, the ground handling contractor for Emery Worldwide Airlines, Inc. (RRXA) at BOS. During the inspection it was found that the Aircraft Loading Manual at that station was a draft copy and was not kept current as required by FAR Part 121.133(a). Operations of this type are contrary to Federal Aviation Regulations.

This letter is to inform you that this matter is under investigation by the Federal Aviation Administration (FAA). We would appreciate receiving any evidence or statements you might care to make regarding this matter within 10 days of receipt of this letter. Any discussion or written statements furnished by you will be given consideration in our investigation and any subsequently prescribed sanction or corrective action. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Sincerely,

**ORIGINAL SIGNED BY**

Jose' O. Berrios  
Aviation Safety Inspector

Enclosure  
Privacy Act notice

24

9040-100



May 1, 2000

Mr. Jose' O. Berrios  
Aviation Safety Inspector  
Federal Aviation Administration  
8303 West Southern Avenue  
Indianapolis, Indiana 46241

Subject: File No. 2000GL110070

Dear Mr. Berrios:

I am writing regarding the above referenced LOI of April 26, 2000 which was received on May 1, 2000..

This LOI is in regard to your inspection of March 31 in which you found an outdated Emery Worldwide Airline Aircraft Loading Manual at East Coast Airport Services.

Mr. Berrios, the current Aircraft Loading Manual was in fact at the East Coast Airport Services main office as it was being reviewed by the Training Manager. The manual has since been returned to the ramp office.

Based on the facts I respectfully request that this file be closed with no further action.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Owens", written over a blacked-out redacted area.

Jim Owens  
Director ULD Management

cc: Kent T. Scott  
Tom Wood  
Pat Nelson  
Harold Camden - CVG PMI

EWA'S RESPONSE TO  
LETTER DATED  
April 27, 2000.



U.S. Department  
of Transportation  
  
Federal Aviation  
Administration

Flight Standards District Office

MAY 1 - 2000  
  
8303 W. Southern Ave.  
Indianapolis, Indiana 46241  
[Redacted]

April 27, 2000

CERTIFIED MAIL—RETURN RECEIPT REQUESTED

File No.: 2000GL110069

8030-2,00

Mr. Kent T. Scott  
Emery Worldwide Airlines, Inc.  
One Emery Plaza  
Dayton International Airport  
Vandalia, OH 45377

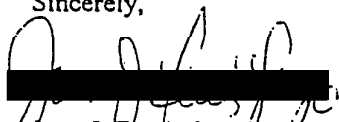
Dear Mr. Scott:

On March 30, 2000, personnel from the Indianapolis Flight Standards District Office observed the unloading operation of a DC-8 -73F, N791FT, operated by Emery Worldwide Airlines, in Fort Lauderdale, Florida (FLL).

An inspection was conducted inside the cargo hold after the unloading operation and two locks at station number 15 were found unsecured and misaligned. Lock number 5 was found with the rear lock screw unsecured and out of the track. Lock number 4 was found improperly positioned approximately 1 foot forward of the required stenciled marks and the other corresponding locks on station 15. Operating the aircraft with two locks not properly secured and in the wrong location is contrary to Federal Aviation Regulations and Emery's Aircraft Maintenance Manual.

This letter is to inform you that this matter is under investigation by the Federal Aviation Administration (FAA). We would appreciate receiving any evidence or statements you might care to make regarding this matter within 10 days of receipt of this letter. Any discussion or written statements furnished by you will be given consideration in our investigation and any subsequently prescribed sanction or corrective action. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Sincerely,

  
[Redacted]  
Juan J. Ferris-Lugo  
Aviation Safety Inspector

cc: H. Camden ✓  
B. Dorn

25



FILE COPY

June 11, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Leslie Korody  
Principal Avionics Inspector  
Federal Aviation Administration  
4240 Airport Road  
Cincinnati, Ohio 45226

RE: File Number. 2001GL050069

Dear Mr. Korody:

The above referenced Letter of Investigation (LOI) was received in this office on June 5, 2001.

The LOI expresses your concern that Lufthansa Airmotive Ireland did not have Emery Worldwide Airlines Maintenance or Policy & Procedure Manuals.

The manuals of concern to you were sent , over night, to Lufthansa Airmotive as soon as you expressed your concern. However, the maintenance performed by Lufthansa Airmotive involves off-wing aircraft engine overhaul and the instructions to them are to perform work in accordance with OEM approved technical data. None of which is included in the Emery Worldwide Airline Maintenance or Policy & Procedure Manuals.

Mr. Korody, based on the fact that maintenance is performed in accordance to manufacturer specifications, we respectfully request that this LOI be closed with no action.

Sincerely,



Jim Owens

Director - Quality Assurance

cc: Jerry Trimarco  
Kent Scott  
Bob Dolf

EWA'S RESPONSE TO  
LETTER DATED  
April 27, 2000

MAY 1 - 2000

CVG FSD

APR 27 2000

Certified-Return Receipt

Mr. Kent T. Scott  
President and Chief Operating  
Officer  
Emery Worldwide Airlines  
Dayton International Airport  
One Emery Plaza  
Vandalia, OH 45377

8030-2.00

Dear Mr. Scott:


Enforcement Investigative Report No. 2000-GL-00-0007

On April 13, 2000, personnel from this office performed an inspection on Emery Worldwide, at the facility, located at 770 E. Irving Park Road, Bensenville, IL, 60106. It was discovered that the three facility scales used to weigh Emery Worldwide Airline freight were only calibrated up to 2000 pounds.

This letter is to inform you that this matter is under investigation by the Federal Aviation Administration (FAA). We would appreciate receiving any evidence or statements you might care to make regarding this matter within 10 days of receipt of this letter. Any written statements furnished by you will be given consideration in our investigation and any subsequently prescribed sanction or corrective action. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Sincerely,

Original Signed By



Luanne Wills-Merrell  
Manager, Technical Programs  
Branch

(26)

4630-11

---

cc: Kent T. Scott  
Tom Wood  
Harold Camden - CVG PMI



EWA'S RESPONSE TO  
LETTER DATED May 9, 2000



U. S. Department  
of Transportation

Federal Aviation  
Administration

May 9, 2000

Mr. Kent Scott  
President & Chief Operating Officer  
Emery Worldwide Airlines, Inc.  
One Emery Plaza  
Dayton International Airport  
Dayton, Ohio 45414

SUBJECT: RASIP FINDING 2.5.3

Dear Mr. Scott,

In response to the RASIP Finding 2.5.3, regarding items repaired as non-Routine items were signed-off without complete description of the work that was accomplished or referenced to (e.g. no maintenance manual reference stated) other accepted or approved documentation.

It has been determined that Emery Worldwide Airlines has addressed this in Revision 21, dated January 15, 2000 of the Maintenance Policy and Procedures Manual Chapter 3, Item B, 1 & 2. Also a Maintenance Information Bulletin was issued February 3, 2000 that defines EWA's procedure that requires the mechanic, when signing off corrective action, to comply with FAR 43.9 as follows:  
Complete and legible description, or approved/accepted manual reference, detailing the work performed to clear the discrepancy will be entered in the correction action.

I have reviewed this and accepted it for content. There will be additional review for accuracy in the future.

If you have any questions, please call me at [REDACTED]

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector

HRC:Lms

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226



CONCURRENCES
ROUTING SYMBOL EG
INITIALS/SIGNATURE [Signature]
DATE 5/11
ROUTING SYMBOL MH
INITIALS/SIGNATURE [Signature]
DATE 5-1
ROUTING SYMBOL HC
INITIALS/SIGNATURE [Signature]
DATE 5-22
ROUTING SYMBOL CT
INITIALS/SIGNATURE [Signature]
DATE 5/15/00
ROUTING SYMBOL LS
INITIALS/SIGNATURE [Signature]
DATE 5-9-00
ROUTING SYMBOL
INITIALS/SIGNATURE
DATE
ROUTING SYMBOL
INITIALS/SIGNATURE
DATE

(27)

## RASIP FINDING

### 2.5.3

Items repaired as Non-Routine items were signed-off without a complete description of the work that was accomplished or referenced to (e.g. no maintenance manual reference stated) other accepted or approved documentation. A review of numerous aircraft logbook sign-offs revealed the same finding; most lacked a detailed description of the work performed or reference to accepted or approved data. In addition, Logbook entries show parts swapped for troubleshooting between identical systems on the same aircraft. The good system that the part was removed from did not indicate that it was operationally checked prior to release back to service. (Reference FAR 43.9)

### 2.5.3 RRXA RESPONSE

- A) EWA mechanics are formally trained to perform all maintenance in accordance with the Maintenance Policy and Procedure Manual (M.P.P.), Chapter 3, Item B, 1 & 2. (FAR 65 Subpart D and FAR 43).

In December 1999, during a meeting with Harold Camden, he requested that the log page sign-off per FAR 43.9 be reviewed and made the recommendation to improve this process by revising the M.P.P. procedure to reflect more details of FAR 43.9. Example: "A complete and legible description, or approved/accepted manual reference, detailing the work performed to clear the discrepancy will be entered in the corrective action." EWA accepted this recommendation and the implementation was discussed.

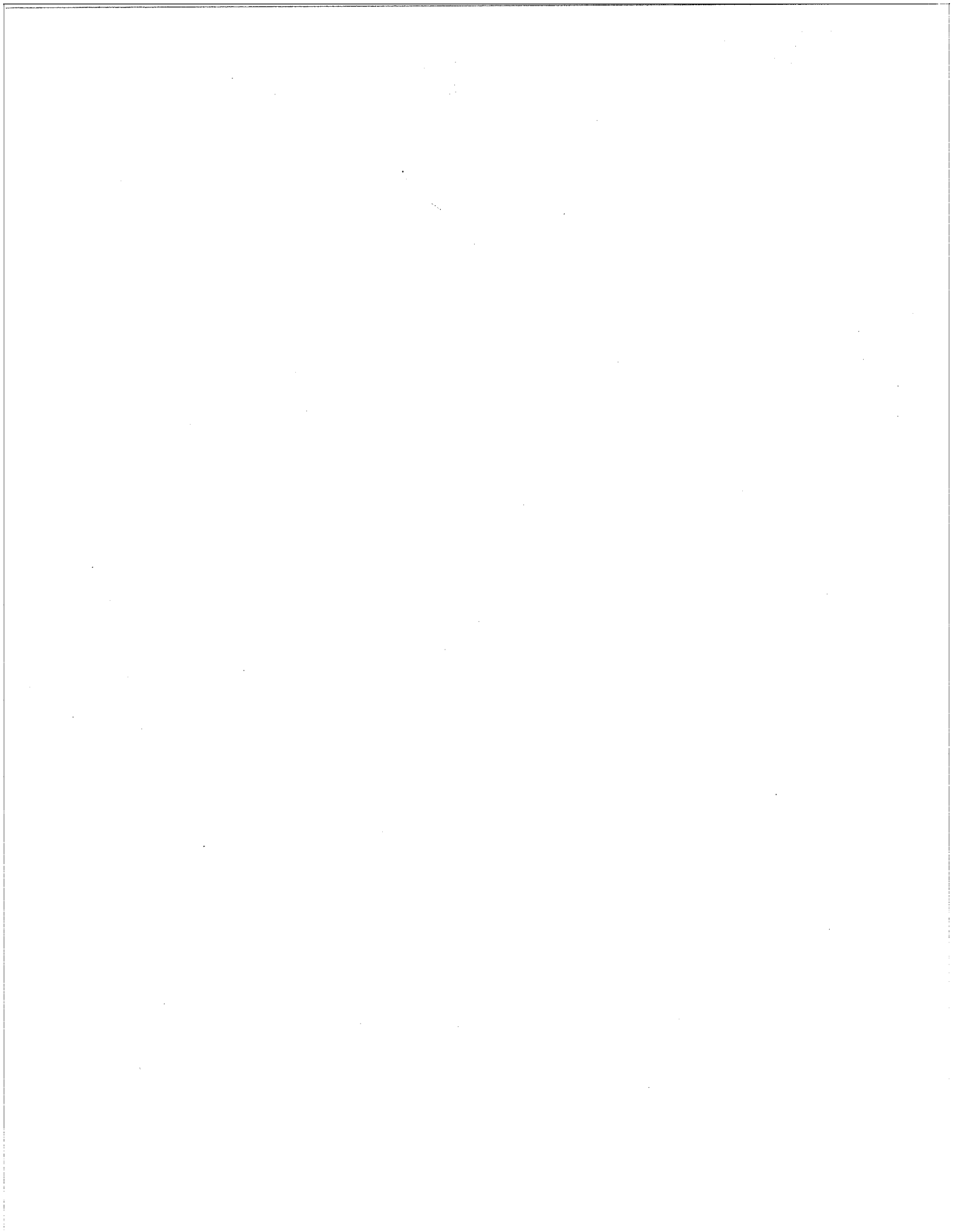
In January 2000, the FAA Maintenance Principals meet with the Manager Programs and Publication and myself and performed a review, page by page of the entire M.P.P.. During this review, changes were made as requested by the FAA Principals, and Revision 21, date January 15, 2000, was accepted.

The Director Quality Control took immediate action concerning this subject at the conclusion of the RASIP by publishing an EWA Maintenance Information Bulletin, #ALL-00-02, February 3, 2000, "Log Page Corrective Action Sign-offs". The subject to improve this process was previously discussed with EWA's FAA PMI, Harold Camden, who accepted the aforementioned bulletin.

A proactive approach to this procedure improvement was continued by the Quality Assurance Section in issuing EWA Aircraft Record Corrections based off of audits of paperwork sign-off that did not reference the Maintenance Manual, and the proposed revision to the M.P.P. regarding the corrective action verbiage was proposed for the next revision.

- B) Conclusion

This finding does not contain proof of non-compliance with the FAR, therefore EWA does not consider this to be a finding.







U.S. Department  
of Transportation  
Federal Aviation  
Administration

DETROIT FLIGHT STANDARDS  
DISTRICT OFFICE

MAY 22 2000

Willow Run Airport - East Side  
8800 Beck Rd.  
Belleville, Michigan 48111

May 15, 2000

Mr. Kent T. Scott  
Emery Worldwide Airlines, Inc.  
One Emery Plaza  
Dayton International Airport  
Vandalia, Ohio 45377

8030-1.00

Dear Mr. Scott:

Personnel of this office researched a smoke barrier curtain deactivation, in accordance with MA-AO-2524-01:00, on an Emery Worldwide Airlines, Inc. DC-8, N873SJ, on March 24, 2000. At the time of deactivation an 8110-3, dated November 10, 1999, existed as the source of approved data to perform this procedure.

At the time of our inspection, the condition of the cockpit door revealed an approximate one inch air gap existed between the top of the door and frame. This office expressed our grave concern of the use of the cockpit door as the sole source of smoke deterrence. As a result of our thorough investigation, it was determined that the flight crew may not have been afforded the smoke protection required in accordance with CAR 4b.383(e)(4). The 8110-3 referenced above was disapproved on May 10, 2000, by the Los Angeles Aircraft Certification Office after their review of the existing documentation.

This office also has concerns over the use of an engineering document to allow minimum equipment list (MEL) relief for an item not addressed by the master MEL (MMEL). If Emery Worldwide Airlines, Inc. desires relief, you must notify the Flight Standards District Office (FSDO), who will make a request of the Flight Operations Evaluations Board (FOEB) to convene and consider adding the equipment to the MMEL.

While we cannot substantiate a violation of the Federal Aviation Regulations at this time, this office expects that future use of MA-AO-2524-01:00 be discontinued.

Sincerely,

William E Takala  
Aviation Safety Inspector

cc: Harold R. Camden

(28)



U.S. Department  
of Transportation  
Federal Aviation  
Administration

San Jose Flight Standards Office

RECEIVED  
OCT 12 1999  
KENT T. SCOTT

cc: Tom Wood  
Rene Visser  
Ted Rivers  
Nick Magnum  
Dan Newberry

San Jose International Airport  
1250 Aviation Avenue, Suite 295  
San Jose, CA 95110-1130  
Phone: (408) 291-7681  
FAX: (408) 279-5448

October 7, 1999

CERTIFIED-RETURN RECEIPT  
File No. 2000WP150001

Mr. Kent Scott  
Senior Vice President  
Emery Worldwide Airlines, Inc.  
One Emery Plaza  
Dayton International Airport  
Vandalia, OH 45377

Dear Mr. Scott:

Personnel of this office are investigating an occurrence, which involved the operation of Emery Worldwide Airlines (RRXA) DC-8 aircraft, with improperly deferred inoperative instrument and equipment.

On September 8, 1999, routine surveillance was performed at the RRXA Dayton Hub Maintenance Control area. During this surveillance, it was discovered that RRXA had deferred two DC-8 aircraft, N8084U and N796FT, Class E Cargo Compartment Smoke Barrier Curtain contrary to the RRXA approved Minimum Equipment List and D95 - Operation Specification. RRXA then operated these two DC-8 aircraft, N8084U and N796FT, in revenue service from the period of August 16, 1999 through September 8, 1999. This is contrary to the Federal Aviation Regulations.

This letter is to inform you that this matter is under investigation by the Federal Aviation Administration (FAA). We would appreciate receiving any evidence or statements you might care to make regarding this matter within 10 days of receipt of this letter. Any discussion or written statements furnished by you will be given consideration in our investigation and any subsequently prescribed sanction or corrective action. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Sincerely,

Nicholas E. Pearson  
Principal Avionics Inspector



November 15, 1999

Mr. Nicholas Pearson  
FSDO-SJC  
1250 Aviation Ave., Suite 295  
San Jose, CA 95110

Dear Mr. Pearson:

This letter constitutes Emery Worldwide Airlines, Inc. (EWA's) follow-up response to our formal response, dated October 29, 1999, to your letter, dated October 7, 1999, File No. 2000WP150001, addressed to EWA's President and Chief Operating Officer (see attachment).

I am providing you the received FAA Form 8110-3 (approved data) to support the subject EWA Maintenance Authorization (see attachment), to close out this subject as addressed in my October 29, 1999 letter, item IV.

In addition, I have enclosed an e-mail from EWA's Boeing DC-8 Representative, that provides support to Airborne on the same subject.

This additional data continues to substantiate that airworthiness, safety, and alleged non-compliance of the Federal Aviation Regulations did not exist and this issue should be closed with no action.

attachments

Sincerely,

Thomas M. Wood  
*Director Quality Control*

cc: Kent Scott  
Rene' Visscher  
Jay Howard  
Bruce Robbins  
Bob Conlon  
Mike Dworkin

TMW/lc



EWA's RESPONSE TO  
LETTER DATED January 5, 2001



U. S. Department  
of Transportation

Federal Aviation  
Administration

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226



January 5, 2001

**LETTER OF INVESTIGATION**  
**FILE NUMBER: 2001GLO50009**

Mr. Kent Scott  
President  
Emery Worldwide Airline  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott,

Personnel of this office are investigating if the Maintenance Manual procedures were properly followed when it was discovered, December 29, 2000, in Boston that DC-8, N602AL had F.O.D. damage to all four engines.

Operations of this type are contrary to the Federal Aviation Regulations specifically 14 C.F.R. 43.13 (a) and (c).

This is to inform you that this matter is under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the matter personally or submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any mitigating circumstances, which you believe may have a bearing on this matter. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter.

Sincerely,

Leslie Korody, PAI for  
Harold R. Camden  
Principal Maintenance Inspector

(29)



January 10, 2001

CERTIFIED MAIL  
Mr. Harold Camden  
Principle Maintenance Inspector  
Federal Aviation Administration  
4240 Airport Road  
Cincinnati, OH 45226

RE: LOI: 2001GL050009

Dear Mr. Camden:

I am writing in response to your Letter of Investigation (LOI) File number 2001GL050009 dated January 5, 2001 and received on January 9, 2001. As you know Emery DC-8, N602AL allegedly experienced F.O.D. damage to all four engines in Boston on December 29, 2000.

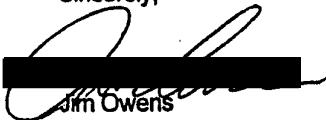
The engines were properly inspected at Boston and the damaged blades were blended per instructions in the CFM Maintenance Manual. A borescope inspection was not performed in Boston since there was no evidence of debris entering the booster inlet or evidence of missing fan blade material, blade tearing or surge/stall or flame out.

However, Emery did, as a precautionary measure, contract with GE On Wing Support to perform Borescope inspections on all four engines, which was accomplished on January 4, 2001, and in each case No Defects Were Noted.

Copies of CFM Maintenance Manual References, Aircraft Log Pages, GE On Wing borescope reports, Emery Worldwide Airlines IPM reference, Interoffice Memo from Dave Ungemach, Director of Line Maintenance, and E-Mail from Zachary Kamen GEAE Field Representative are attached.

Mr. Camden, based on the facts I respectfully request that this LOI be closed with no action.

Sincerely,



Jim Owens  
Director, Quality Assurance

attachments

cc: David Marshall  
Jerry Trimarco  
Kent Scott  
Robert Doll ✓  
Dave Ungemach

EWA'S RESPONSE TO  
LETTER DATED January 9, 2001



U. S. Department  
of Transportation

Federal Aviation  
Administration

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226




January 9, 2001

Case No. 2001GL050010

Mr. Jim Owens  
Director of Quality Assurance  
Emery Worldwide Airlines  
One Emery Plaza  
Dayton International Airport  
Vandalia, Ohio 45377

Dear Mr. Owens,

We have received your Air Carrier Voluntary Disclosure Report dated December 4, 2000 regarding the apparent violation of a #3 Thrust Reverser on aircraft N950R came off. This report is currently under review by this office.

If you have any questions, or would like to add and information to this issue, please call us at 

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector



December 13, 2000

**Mr. Harold Camden**  
*Principal Maintenance Inspector*  
Federal Aviation Administration  
Flight Standard District Office – GL05  
4240 Airport Road  
Cincinnati, Ohio 45226

**Re: Voluntary Disclosure**

Dear Mr. Camden:

This report is submitted pursuant to Air Carrier Voluntary Disclosure Reporting Procedures. On December 4th, 2000 you were informed of this apparent inadvertent violation.

Emery Worldwide Airlines voluntarily discloses an apparent violation in which proper maintenance and inspection were not performed on EWA aircraft N950R. Upon landing in Dayton the number 3 lower Thrust Reverser came off the track.

**Certificate Number** RRXA558B

**Company Name** Emery Worldwide Airlines  
One Emery Plaza  
Vandalia, Ohio 45377

**Company Official Filing Report**

James Owens  
Director Quality Assurance  
[REDACTED]

**Description of Apparent Violation**

Failure to perform required aircraft maintenance and inspections by properly securing the two bolts that secure the track stop with safety wire.

**Date Apparent Violation was Discovered**

December 3rd, 2000

**Location of the Discovery**

Dayton, Ohio USA

**Person that Discovered the Apparent Violation**

Dayton Tower & EWA Maintenance Control

**Date and time of Initial Notification to the FAA**

December 4th, 2000 via letter

**Name of FAA Official Notified**

Mr. Harold Camden  
Principal Maintenance Inspector  
Federal Aviation Administration

**Company Official Making Notification**

James Owens  
Dir. Quality Assurance

**Duration of Time Remained Undetected**

0 Days  
0 Cycles  
0 Days

**Summary of Apparent Violation:**

Improperly secured bolts that secure the number 3 Thrust Reverser Track to the stop.

**When Immediate Action Taken**

December 4<sup>th</sup>, 2000.

**Person Responsible for Immediate Action**

Dave Ungemach  
Director Line Maintenance

**Analysis:**

A detailed inspection of the number 3 Thrust Reverser was conducted by Dayton Line Maintenance. Based on this inspection it was determined that the most likely cause of this failure was an inadvertent failure to secure the track stop bolts with the required safety wire. Resulting in the bolts working loose and the lose of the lower aft stop.

**Comprehensive Fix Proposal:**

An Interoffice Memorandum has been sent to all Emery Worldwide Airlines Line Mechanics stressing the importance of properly performing maintenance functions which includes performing required RII inspections. (A copy of the memorandum is attached.)

**Person(s) Monitoring the Comprehensive Fix**

David Ungemach  
Director Line Maintenance  
[REDACTED]

Jack Smith  
Manager Line Maintenance  
[REDACTED]

Should you have any questions or comments, or require additional information please do not hesitate to contact me at [REDACTED]

Sincerely,

  
[REDACTED]

Jim Owens  
Director Quality Assurance

cc: Jerry Trimarco  
Kent Scott  
Robert Doll  
Ted Graves  
Andy Granuzzo  
Dave Ungemach  
Edward Jones

EWA'S RESPONSE TO

LETTER January 9, 2001





U.S. Department  
of Transportation  
Federal Aviation  
Administration

Federal Aviation Administration  
4240 Airport Road  
Cincinnati, Ohio 45226

January 9, 2001

Case No. 2001GL050007

Mr. Jim Owens  
Director of Quality Assurance  
Emery Worldwide Airlines  
One Emery Plaza  
Dayton International Airport  
Vandalia, Ohio 45377

Dear Mr. Owens,

On November 9, 2000, and in accordance with AC 00-58, an Air Carrier Voluntary Self-Disclosure report was sent to this office. It concerned Emery Worldwide Airlines failure to conduct proper inspections as outlined within the Emery Worldwide Airlines Approved MEL.

After discussions concerning this occurrence involving your company, it was determined that this was an inadvertent case of the mechanic not checking the log page for this maintenance action. We find your comprehensive fix proposal acceptable as stated in your letter dated November 17, 2000. We have concluded that this matter appears to be an isolated case and therefore does not warrant legal enforcement action. In lieu of such action, we are issuing this letter which will be made a matter of record.

If you wish to add any additional information in explanation of mitigation, please write me at this address. Otherwise, we will expect your future and continued compliance with the United States Code of Federal Aviation Regulations.

Sincerely,

Mr. Harold R. Camden  
Principal Maintenance Inspector

CONCURRENCES
ROUTING SYMBOL RG
INITIALS/SIGNATURE
DATE
ROUTING SYMBOL MA
INITIALS/SIGNATURE
DATE 1-9
ROUTING SYMBOL HC
INITIALS/SIGNATURE
DATE
ROUTING SYMBOL RV
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DATE



November 17, 2000

Mr. Harold Camden  
Principal Maintenance Inspector  
Federal Aviation Administration  
Flight Standard District Office – GL05  
4240 Airport Road  
Cincinnati, Ohio 45226

**Re: Voluntary Disclosure**

Dear Mr. Camden:

This report is submitted pursuant to Air Carrier Voluntary Disclosure Reporting Procedures. On November 17<sup>th</sup>, 2000. You were informed of this apparent inadvertent violation by a letter dated November 9, 2000 from Thomas Wood.

Emery Worldwide Airlines voluntarily discloses an apparent violation of DC-10 MEL item 27-6 on aircraft N831LA. A flap irregularity was properly deferred per MEL item 27-6. However, the inspection on each flight following the deferral was not completed.

<b>Certificate number</b>	RRXA558B
<b>Company Name</b>	Emery Worldwide Airlines One Emery Plaza Vandalia, Ohio 45377
<b>Company Official Filing Report</b>	James Owens Director Quality Assurance [REDACTED]
<b>Description of Apparent Violation</b>	Failure to perform required aircraft inspections according to MEL requirements.
<b>Date Apparent Violation was Discovered</b>	November 9, 2000
<b>Location of the Discovery</b>	Dayton, Ohio USA
<b>Person that Discovered the Apparent Violation</b>	Ronald Moody Manager Quality Assurance [REDACTED]
<b>Date and time of Initial Notification to the FAA</b>	November 9 <sup>th</sup> , 2000 via letter.

**Name of FAA Official Notified** Mr. Harold Camden  
Principal Maintenance Inspector  
Federal Aviation Administration

**Company Official Making Notification** Thomas Wood  
Sr. Dir. Quality Control

**Duration of Time Remained Undetected** Ten (10) Days  
Thirteen (13) Cycles\*  
Nine (9) Days

\*Proper documented inspections were performed during three (3) of the thirteen (13) cycles.

**Summary of Apparent Violation:**

On November 9<sup>th</sup>, during routine Log Book page audits by EWA Quality Assurance, it was discovered that proper inspection and log book entry procedures were not consistently accomplished per DC-10 MEL item 27-6. This oversight was reported to Thomas Wood, Sr. Director of Quality Control who reported this finding to our Principal Maintenance Inspector Mr. Harold Camden by letter dated November 9<sup>th</sup>.

This error was discovered after the DMI was closed on November 8<sup>th</sup>.

**When Immediate Action Taken** By letter November 9<sup>th</sup>.

**Person Responsible for Immediate Action** Thomas Wood  
Sr. Director Quality Control

**Analysis:**

Deferral procedures in the Emery Worldwide Airlines Maintenance Policies & Procedures Manual are clear as to the required actions necessary for handling deferred items. However, it is obvious that additional measures must be taken to strengthen the published procedure to prevent future errors of this nature.

**Comprehensive Fix Proposal:**

- a. This apparent violation does not involve equipment or any other individuals than those identified above
- b. The apparent violation is procedural.
- c. Procedural changes will be audited by EWA Quality Assurance on an ongoing basis
- d. Effective immediately an enhancement to the procedures in the MP&P will be initiated.

Maintenance Control will verbally advise Line Mechanics of outstanding DMI'S that require inspection and Log Book entries. Prior to departure Maintenance Control will confirm that the required inspection items and Log Book entries have been accomplished according to the applicable MEL and a copy of the completed log page will be faxed to the Maintenance Controller for review.

Quality Assurance will continue to audit all aircraft log pages and

The redundancy that this procedure introduces will prevent inadvertent errors of this nature in the future.

**Person(s) Monitoring the Comprehensive Fix**

Jim Owens  
Director Quality Assurance  
[REDACTED]

David Ungamach  
Director Line Maintenance  
[REDACTED]

Wayne Farnsworth  
Manager Maintenance Control  
[REDACTED]

Should you have any questions or comments, or require additional information please do not hesitate to contact me at [REDACTED]

Sincerely,



Jim Owens  
Director Quality Assurance

Cc: Jerry Trimarco  
Kent Scott  
Robert Doll  
Ted Graves  
Andy Granuzzo  
Dave Ungemach  
Ed Jones

EWA'S RESPONSE TO

LETTER DATED January 22, 2001



U. S. Department  
of Transportation

Federal Aviation  
Administration

2.02.1  
FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226  
[REDACTED]

January 22, 2001

FILE NUMBER: 2001GL050012

Mr. Kent Scott  
President  
Emery Worldwide Airline Inc.  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott:

The Great Lakes Regional RASIP Inspection performed October 16, 2000 through November 2, 2000 had the following finding which personnel of this office are investigating.

Paragraph D074 of the Emery Worldwide Airline Inc. Certificate (RRXA) Operations Specifications (OPSSPECs), is not current. Document EWA-51990 Shows Rev. #7B; it should be Rev. 8.

Operations of this type are contrary to the Federal Aviation Regulations.

This is to inform you that this matter is under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the matter personally or submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any mitigating circumstances, which you believe may have a bearing on this matter. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter.

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector

2001GL050012

FINDING: 2.02.1

Paragraph D074 of RRXA OPSS is not current. Document EWA-51990 shows Rev. #7B; it should be Rev. #8. This is contrary to 14CFR 1 19.7(a)(1).

RRXA RESPONSE:

*The Maintenance Program and Publications section revised the Time Limits Manual with the current Operation Specifications, Part D incorporated and received FAA CVG PMI approval on 10/12/00. This revision was in distribution during the RASIP Inspection.*



U. S. Department  
of Transportation

Federal Aviation  
Administration

2.03.05

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226



January 22, 2001

FILE NUMBER: 2001GL050014

Mr. Kent Scott  
President  
Emery Worldwide Airline Inc.  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott:

The Great Lakes Regional RASIP Inspection performed October 16,2000 through November 2, 2000 had the following finding which personnel of this office are investigating.

There is no system to revise the Manufacturers Maintenance Manual procedure, Illustrated Parts Catalog (IPC) or Wiring Diagram Manual after Maintenance Authorizations (MA) or Engineering Orders (EO) have been written. Emery Worldwide Airlines Inc. Certificate (RRXA) Maintenance Policy & Procedures Manual (MPPM) States maintenance/operations manuals will be revised as a result of an MA/EO. The MA or EO cover page identifies the documents that are changed due to the MA/EO, but the affected manual is not revised. A document supplement is created but it is not filed with the manual or in an organized system. The mechanic would not be aware that the Manufacturer's Maintenance Manual is no longer accurate.

Operations of this type are contrary to the Federal Aviation Regulations.

This is to inform you that this matter is under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the matter personally or submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any mitigating circumstances, which you believe may have a bearing on this matter. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter.

Sincerely,

Harold R. Camden

Principal Maintenance Inspector

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- 2.03.05 There is no system to revise the Manufacturers Maintenance Manual procedure, IPC or Wiring Diagram Manual after Maintenance Authorizations (MA) or Engineering Orders (EO) have been written.

RRXA MPPM states maintenance/operations manuals will be revised as a result of an MA/EO. The MA or EO cover page identifies the documents that are changed due to the MA/EO, but the affected manual is not revised. A document supplement is created but it is not filed with the manual or in an organized system. The mechanic would not be aware that the Manufacturer's Maintenance Manual is no longer accurate. This is contrary to 14CFR 43.13(a) which states maintenance must be performed with current data.

**RRXA RESPONSE:**

*Maintenance document supplements are created as necessary to support changes made as a result of a MA/EO. The MA or EO cover page only identifies "the manual(s) affecting the appropriate type of work required to be accomplished by the EO/MA", not changed due to the MA/EO. Supplemental manuals are currently issued as necessary to support aircraft maintenance operations.*

*Procedures will be incorporated to place a "circle" around the chapter title number, on the Table of Contents label, of the maintenance manual, IPC, or wiring diagram microfilm cartridge for those chapters affected by the EO/MA changes. This will indicate that supplemental information exists against this chapter. These procedures will be added to the MP&P, Chapter 1. Supplemental manuals are/will be issued to support the MA/EO changes.*



U. S. Department  
of Transportation

Federal Aviation  
Administration

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226



2.06.01

January 23, 2001

FILE NUMBER: 2001GL050017

Mr. Kent Scott  
President  
Emery Worldwide Airline Inc.  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott:

The Great Lakes Regional RASIP Inspection performed October 16, 2000 through November 2, 2000 had the following finding which personnel of this office are investigating.

Emery Worldwide Airlines Inc. Certificate (RRXA) DC-8 and DC-10 MEL/CDL Manuals currently in use by line maintenance at RRXA headquarters, Dayton, Ohio are not current. This is contrary to 14CFR 121.137(b) which requires each person to whom a manual has been issued to keep it up to date.

Operations of this type are contrary to the Federal Aviation Regulations.

This is to inform you that this matter is under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the matter personally or submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any mitigating circumstances, which you believe may have a bearing on this matter. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter.

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector

20016LC50017

**FINDING:** 2.06.01 The DC-8 and DC-10 MEL/CDL Manuals currently in use by line maintenance at RRXA headquarters, Dayton, Ohio are not current. This is contrary to 14CFR 121.137(b) which requires each person to whom a manual has been issued to keep it up to date.

*RRXA RESPONSE: EWA Director, Line Maintenance was advised the day of the alleged finding. He immediately went to Maintenance Control and inspected all MEL/CDL Manuals and found that all had the current revisions. He immediately reported this to the POI and PMI and there were no other issues. There are uncontrolled MEL/CDL Manuals at the Line Maintenance Trailor and in the Vans. These are used for training purposes only. All MEL/CDL issues are coordinated through Maintenance Control and current MEL/CDL pages are obtained by the mechanics from Maintenance Control.*



U. S. Department  
of Transportation

Federal Aviation  
Administration

2.06.10

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226



January 23, 2001

FILE NUMBER: 2001GL050018

Mr. Kent Scott  
President  
Emery Worldwide Airline Inc.  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott:

The Great Lakes Regional RASIP Inspection performed October 16, 2000 through November 2, 2000 had the following finding which personnel of this office are investigating.

Emery Worldwide Airlines Inc. Certificate (RRXA), stores facility is not adequate to maintain aircraft parts/components in a clean and protected condition. This has allowed them to be subject to deterioration and corrosion. Numerous unserviceable parts, and/or identified parts are intermixed with serviceable parts. Parts are stacked in center aisles and not identified. This is contrary to 14 CFR 121.23 and 121.367 (b).

Operations of this type are contrary to the Federal Aviation Regulations.

This is to inform you that this matter is under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the matter personally or submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any mitigating circumstances, which you believe may have a bearing on this matter. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter.

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector

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2.06.10 RXXA stores facility is not adequate to maintain aircraft parts/components in a clean and protected condition. This has allowed them to be subject to deterioration and corrosion. Numerous unserviceable parts, and/or identified parts are intermixed with serviceable parts. Parts are stacked in center aisles and not identified. This is contrary to 14CFR 121.123 and 121.367(b).

*RRXA RESPONSE: The issues in the finding have been addressed and are now corrected. We agree that the EWA Stores facility is lacking but with proper attention to detail we can make it work for the near future. We currently have submitted a Capital Expenditure request to build a new 125,000 square foot facility in Dayton to house our stores operation. We expect approval in the near future and plan to have the facility operational by the end of the year.*



U. S. Department  
of Transportation

Federal Aviation  
Administration

2.06.15

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226



January 23, 2001

FILE NUMBER: 2001GL050022

Mr. Kent Scott  
President  
Emery Worldwide Airline Inc.  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott:

The Great Lakes Regional RASIP Inspection performed October 16, 2000 through November 2, 2000 had the following finding which personnel of this office are investigating.

Emery Worldwide Airlines Inc. Certificate (RRXA) at the Dayton hub maintenance facilities are inadequate and have been for some time due to fleet size, type of aircraft, age of aircraft fleet and the maintenance and inspections performed at the location. This is contrary to 14CFR 121.123 and 121.367.

Operations of this type are contrary to the Federal Aviation Regulations.

This is to inform you that this matter is under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the matter personally or submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any mitigating circumstances, which you believe may have a bearing on this matter. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter.

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector

2/c

2.06.15 RRXA Dayton hub maintenance facilities are inadequate and have been for some time due to fleet size, type of aircraft, age of aircraft fleet and the maintenance and inspections performed at the location. This is contrary to 14CFR 121.123 and 121.367.

**RRXA RESPONSE:** *No specific deficiencies are mentioned in the alleged finding. Emery is unable to respond. Previous RASIP and NASIP inspections have not found facilities to be of concern even though there were more aircraft on the RRXA certificate.*



U. S. Department  
of Transportation

Federal Aviation  
Administration

2-11-02

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226



January 23, 2001

FILE NUMBER: 2001GL050025

Mr. Kent Scott  
President  
Emery Worldwide Airline Inc.  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott:

The Great Lakes Regional RASIP Inspection performed October 16, 2000 through November 2, 2000 had the following finding which personnel of this office are investigating.

Emery Worldwide Airlines Inc. Certificate (RRXA) 10/20/00, N2674U was returned to service and operated while in an unairworthy condition. The pilot had written an occurrence that affected the autopilot system and the GPWS. Corrective action was taken on the autopilot system. The GPWS was not addressed. This is contrary to 121.153(a)(2).

Operations of this type are contrary to the Federal Aviation Regulations.

This is to inform you that this matter is under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the matter personally or submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any mitigating circumstances, which you believe may have a bearing on this matter. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter.

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector



2.11.02 On 10/20/00, N2674U was returned to service and operated while in an unairworthy condition. The pilot had written an occurrence that affected the autopilot system and the GPWS. Corrective action was taken on the autopilot system. The GPWS was not addressed. This is contrary to 121.153(a)(2).

*RRXA RESPONSE:*

*The autopilot was deferred in accordance with the DC-8 MEL which did not at the time of this inspection require that the GPWS be disabled. A request has been made to change the MEL to include the note that if the affected part of the autopilot is deferred that the GPWS must be disabled.*




U. S. Department  
of Transportation

Federal Aviation  
Administration

2.08.04

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226



January 23, 2001

FILE NUMBER: 2001GL050026

Mr. Kent Scott  
President  
Emery Worldwide Airline Inc.  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott:

The Great Lakes Regional RASIP Inspection performed October 16, 2000 through November 2, 2000 had the following finding which personnel of this office are investigating.

Aircraft N811AL was issued Deferred Maintenance Item (DMI) #C7088232-8806 IAW MEL 25-21 which required the #2 pallet position to be rendered inoperative. On Flt. 26 on 10/05/00, freight was loaded in this unusable position. This is contrary to MEL 25-21.

Operations of this type are contrary to the Federal Aviation Regulations.

This is to inform you that this matter is under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the matter personally or submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any mitigating circumstances, which you believe may have a bearing on this matter. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter.

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector

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2001GLOS0026

FINDING 2.08.04

Aircraft N811AL was issued DMI #C7088232-8806 [AW MEL 25-21 which required the #2 pallet position to be rendered inoperative. On Flt. 26 on 10/05/00, freight was loaded in this unusable position. This is contrary to MEL 25-21 and 14CFR 121.628(a)(5).

RRXA RESPONSE:

*No supporting documentation was provided with this alleged finding which makes it impossible to respond authoritatively to the allegation. However, since EB026 originates in Dayton I believe that the aircraft did not depart with any cargo in the #2 position. Position 2 would have been used while loading all cargo positions since number 2 is the door position.*



U. S. Department  
of Transportation

Federal Aviation  
Administration

2.13.02

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226



January 23, 2001

FILE NUMBER: 2001GL050034

Mr. Kent Scott  
President  
Emery Worldwide Airline Inc.  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott:

The Great Lakes Regional RASIP Inspection performed October 16, 2000 through November 2, 2000 had the following finding which personnel of this office are investigating.

Emery Worldwide Airlines Inc. Certificate (RRXA) does not have adequate separation between maintenance and inspection. The RRXA Maintenance Policy & Procedures Manual states that every effort should be made to avoid a Quality Control (QC) inspector, RII inspector or Designated QC Inspector being involved in the work or supervision on an RII. RRXA does not have sufficient inspectors; of the 63 RII authorized inspectors at Dayton; six (6) are in the QC/QA departments and four (4) of these are directors or managers. This is contrary to 14CFR 121.365 (c).

Operations of this type are contrary to the Federal Aviation Regulations.

This is to inform you that this matter is under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the matter personally or submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any mitigating circumstances, which you believe may have a bearing on this matter. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter.

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector

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- 2.13.02 RRXA does not have adequate separation between maintenance and inspection. The RRXA MPPM states that every effort should be made to avoid a Quality Control (QC) inspector, RII inspector or Designated QC Inspector being involved in the work or supervision of an RII. RRXA does not have sufficient inspectors; of the 63 RII authorized inspectors at DAY; six (6) are in the QC/QA departments and four (4) of these are directors or managers. This is contrary to 14CFR 121.365(c).

**RRXA RESPONSE:**

*EWA meets the FAR requirements of 121.365(c) providing a separation of maintenance and inspection by the use of delegated Inspection (RII) authority (MPP, Chapter 4, page 121). EWA currently employees 465 mechanics to which 128 are designated RII personnel. This number only represents 27% of the mechanics, as qualified, authorized designated RII personnel. EWA's MOO procedures administer and control the required separation of the maintenance and inspection functions.*



U. S. Department  
of Transportation

Federal Aviation  
Administration

2.14.04

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226



January 24, 2001

**FILE NUMBER: 2001GL050035**

Mr. Kent Scott  
President  
Emery Worldwide Airline Inc.  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott:

The Great Lakes Regional RASIP Inspection performed October 16, 2000 through November 2, 2000 had the following finding which personnel of this office are investigating.

Emery Worldwide Airlines Inc. Certificate (RRXA) Maintenance Policy and Procedures Manual (MPPM) Chapter 4, Section F.3 defers to Coordinating Agency for Supplier Evaluation (CASE) for intervals of audits. CASE performs audits; they do not establish intervals. This is contrary to the 24 months that's been established by RRXA in their MPPM.

Operations of this type are contrary to the Federal Aviation Regulations.

This is to inform you that this matter is under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the matter personally or submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any mitigating circumstances, which you believe may have a bearing on this matter. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter.

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector

40

2001GL050035

2.14.04 RRXA MPPM, Chapter 4, Section F.3 defers -to CASE for intervals of audits. CASE performs audits, they do not establish intervals. This is contrary to 14CFR121.373 and the 24 months that's been established by RRXA in their MPPM.

**RRXA RESPONSE:**

*MPP, Chapter 4, page 26 provides a 24 calendar month audit interval for Vendor/ Contract agencies. Page 39, of the same chapter, item E "C.A.S.E. Vendor Performance Monitoring (FAR 121.373), provides an FAA acceptable means of vendor surveillance and analysis compliance per 121.373(a). The audit intervals are controlled by the Air Carrier Section of the C.A.S.E. Policy and Procedures Manual.*



U. S. Department  
of Transportation

Federal Aviation  
Administration

2.16.01

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226



January 24, 2001

FILE NUMBER: 2001GL050036

Mr. Kent Scott  
President  
Emery Worldwide Airline Inc.  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott:

The Great Lakes Regional RASIP Inspection performed October 16, 2000 through November 2, 2000 had the following finding which personnel of this office are investigating.

Emery Worldwide Airlines Inc. Certificate (RRXA) does not maintain a list of major alterations to each airframe, engine and appliance.

Operations of this type are contrary to the Federal Aviation Regulations.

This is to inform you that this matter is under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the matter personally or submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any mitigating circumstances, which you believe may have a bearing on this matter. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter.

Sincerely,

Harold R. Camden  
Principal Maintenance Inspector

(41)



2001GL050036

FINDING: 2.16.01 RRXA does not maintain a list of major alterations to each airframe, engine and appliance. This is contrary to 14CFR 121.380(a)(2)(vii).

RRXA RESPONSE: *121.380(a)(1)(vii) requires "A list of current major alterations to each airframe, engine, propeller and appliance", however not a list of major repairs.*

*121.707 requires EWA to prepare a report of each major alteration and submit to the FSDO FAA Principal and keep a copy of each report of a major repair available for inspection by the FSDO FAA Principal.*

*EWA maintains a record of all major repairs to which ni lists are required by the FARS's. A list of all major alterations was maintained, however, not complete. This review was underway during the RASIP and is complete.*

EWAS RESPONSE TO  
LETTER DATED May 5, 2001

80304



U. S. Department of Transportation

Federal Aviation Administration

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226

May 5, 2001

FILE NUMBER: 2001GL050060

Mr. Kent Scott  
President  
Emery Worldwide Airline Inc.  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott:

Personnel of this office are investigating an issue, which involved a DC-8 landing in Nashville, TN with left main landing gear retracted.

Operations of this type are contrary to Federal Aviation Regulations.

This letter is to inform you that this matter is under investigation by the Federal Aviation Administration (FAA). We would appreciate receiving any evidence or statements you might care to make regarding this matter within 10 days of receipt of this letter. Any discussion or written statements furnished by you will be given consideration in our investigation and any subsequently prescribed sanction or corrective action. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Sincerely,

Mr. Larry Sheaffer  
Assistant Principal Maintenance Inspector

cc.  
Jerry Trimarco

CONCURRENCES
ROUTING SYMBOL RG
INITIALS/SIGNATURE [Signature]
DATE 5/1/01
ROUTING SYMBOL MH
INITIALS/SIGNATURE [Signature]
DATE 5-4
ROUTING SYMBOL CT
INITIALS/SIGNATURE C
DATE 5/3/01
ROUTING SYMBOL HC
INITIALS/SIGNATURE [Signature]
DATE 5-3-01
ROUTING SYMBOL LS
INITIALS/SIGNATURE [Signature]
DATE 6-4-0
ROUTING SYMBOL JF
INITIALS/SIGNATURE [Signature]
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ROUTING SYMBOL
INITIALS/SIGNATURE
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ROUTING SYMBOL
INITIALS/SIGNATURE
DATE



May 23, 2001

A **CTF** COMPANY

Mr. Larry Sheaffer.  
Assistant PMI  
Federal Aviation Administration  
4240 Airport Road  
Cincinnati, Ohio 45226

RE: File Number. 2001GL050060

Dear Mr. Sheaffer:

The above referenced Letter of Investigation (LOI) dated May 5, 2001 was received in this office on May 23.

The subject of this LOI is the landing of aircraft N8076EB with the Left Main Landing Gear retracted.

Mr. Sheaffer, the facts related to this incident are well known by yourself and others in the FAA and the NTSB.

We have also received an LOI, from Mr. Les Korody, related to this incident as it pertains to the receiving inspection for the part that was installed on the aircraft. New procedures have been written expanding the scope of EWA's receiving inspection procedures. This will be reviewed with Mr. Korody upon his return.

Since a related LOI has already been issued I respectfully request that LOI 2001GL050060 be closed with no further action.

Sincerely,

A handwritten signature in black ink, which appears to be "Jim Owens". The signature is written over a thick black horizontal line that has been drawn across the page.

Jim Owens

Director-Quality Assurance

cc: Jerry Trimarco  
Kent Scott  
Bob Doll

EWA'S RESPONSE TO  
LETTER DATED May 24, 2001



U. S. Department  
of Transportation

Federal Aviation  
Administration

May 24, 2001

LETTER OF INVESTIGATION  
FILE NUMBER: 2001GL050066

Mr. Timothy Copley  
[REDACTED]  
Enon, OH 45323

Dear Mr. Copley,

Personnel of this office are investigating an alleged violation that occurred on April 25, 2001, after you conducted maintenance on aircraft N8076U. As a result, the aircraft had to make an emergency landing at the Nashville International Airport on the following day, April 26, 2001.

It appears that on these dates Emery Worldwide Airlines Inc. caused this aircraft to be operated in an unairworthy condition. Operations of this type are contrary to Federal Aviation Regulations.

This letter is to inform you that this matter is under investigation by the Federal Aviation Administration. We would appreciate receiving any evidence or statements you might care to make regarding this matter within 10 days of receipt of this letter. Any discussion or written statements furnished by you will be given consideration in our investigation. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter. If you have any questions, please call me at [REDACTED]

Sincerely,

Larry Sheaffer,  
Assistant Principal Maintenance Inspector

CONCURRENCES
ROUTING SYMBOL EGM
INITIALS/SIGNATURE [Signature]
DATE 5/24/01
ROUTING SYMBOL MM
INITIALS/SIGNATURE [Signature]
DATE 5-24
ROUTING SYMBOL HC
INITIALS/SIGNATURE [Signature]
DATE 05-29-01
ROUTING SYMBOL ET
INITIALS/SIGNATURE G
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June 22, 2001

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Mr. Larry Sheaffer  
Assistant PMI  
Federal Aviation Administration  
4240 Airport Road  
Cincinnati, Ohio 45226

RE: File Number 2001GL050066

Dear Mr. Sheaffer:

Mr. Timothy Copely has received the above referenced Letter of Investigation ("LOI"), dated May 24, 2001, concerning the emergency landing of aircraft N8076U in Nashville on April 26. Both Emery Worldwide Airlines ("EWA") and Mr. Copely take very seriously the allegations in the LOI. Both intend to continue to cooperate with your investigation so that the matter may be resolved and closed as expeditiously and as fairly as possible.

As you know, the FAA held an informal interview with Mr. Timothy Copely on May 18, 2001 concerning the circumstances surrounding the Nashville incident. We believe that the information learned by Mr. Jim Franklin and yourself during that interview indicates that Mr. Copely followed the relevant EWA FAA-approved procedures.

EWA has conducted an internal review of the Nashville incident and the relevant EWA procedures. EWA is committed to ensuring that the procedures used by its employees preclude the occurrence of incidents such as this one. EWA plans to work with the FAA to achieve this goal, and may suggest procedural changes to the FAA.

We believe strongly that these proactive measures will be much more effective in preventing occurrences of this nature than would enforcement action against EWA employees who were complying in good faith with FAA-approved company procedures. For that reason, we respectfully request that the FAA close this LOI with no further action.

Thank you for your courtesy in this matter. We look forward to continuing to work with you consistent with EWA's and Mr. Copely's goal of maintaining full compliance with the FARs.

Sincerely,



Jim Oweris  
Director – Quality Assurance

cc: Jerry Trimarco  
Kent Scott  
Bob Doll



EWA'S RESPONSE TO  
LETTER DATED June 5, 2001

8020-1



U. S. Department of Transportation

Federal Aviation Administration

FLIGHT STANDARDS DISTRICT OFFICE  
4240 Airport Road  
Cincinnati, Ohio 45226



June 5, 2001

FILE NUMBER: 2001GL050069

Mr. Kent Scott  
President  
Emery Worldwide Airline Inc.  
One Emery Plaza  
Vandalia, Ohio 45377

Dear Mr. Scott:

During a visit of your heavy engine maintenance facility Lufthansa Airmotive Ireland Ltd., personnel from the CHDO discovered the repair station does not have, and never has had, any Emery Worldwide Airlines Maintenance or Policy & Procedure Manuals.

Operations of this type are contrary to the Federal Aviation Regulations.

This is to inform you that this matter is under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the matter personally or submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any mitigating circumstances which you believe may have a bearing on this matter. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Thank you for your attention to this matter.

Sincerely,

Leslie Korody  
Principal Avionics Inspector

CONCURRENCES
ROUTING SYMBOL RC
INITIALS/SIGNATURE [Signature]
DATE 6/5/01
ROUTING SYMBOL MH
INITIALS/SIGNATURE [Signature]
DATE 6-5
ROUTING SYMBOL HC
INITIALS/SIGNATURE [Signature]
DATE 6-5-0
ROUTING SYMBOL CT
INITIALS/SIGNATURE G
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ROUTING SYMBOL LK
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May 5, 2000

Mr. Juan J. Berres-Lugo  
Aviation Safety Inspector  
Federal Aviation Administration  
8303 W. Southern Ave.  
Indianapolis, Indiana 46241

Subject: File No. 2000GL110069

Dear Mr. Berres-Lugo:

I am writing regarding the above referenced LOI of April 27, 2000 which was received on May 5, 2000..

This LOI is in regard to your inspection of March 30, of aircraft N791FT, in which, after off load, you discovered that, position number 15 had one pallet lock was loose and another misaligned.

There is a Maintenance Log entry that does confirm that the locks were as you saw them and that corrective action was taken. However, there is no indication that the aircraft actually operated with the locks as you describe. It is possible that the locks were moved and loosened during the off load process.

We are very concerned with cargo being properly secured on Emery aircraft and do have procedures for reporting any missing, broken, loose or misaligned locks. No lock discrepancies were reported for the flight to Fort Lauderdale at the origin station so I can only assume that nothing was malfunctioning at the time the aircraft was loaded.

Mr. Berris-Lugo, based on the fact that there is no indication that you observed that the cargo was improperly secured during flight, we respectfully request that this Letter of Investigation be closed with no action.

Sincerely,

A handwritten signature in black ink, appearing to be "Jim Owens". The signature is written over a solid black rectangular redaction box.

Jim Owens

Director ULD Management

cc: Kent T. Scott  
Tom Wood  
Harold Camden - CVG PMI