DOCKET No.: SA-521
EXHIBIT No. 17NN

NATIONAL TRANSPORTATION SAFETY BOARD

WASHINGTON, D.C.

Excerpts from FAA RASIP of Emery January 18-28, 2000,
and Corresponding Emery responses

(18 pages)

2.3.3
The "A" Check inspection for the DC-8 fleet was deleted approximately one year ago. "A" Checks are still mentioned in several places in the Inspection Procedures Manual (Vol III, Chapter 2, page 3).

2.3.4
The Maintenance Policy and Procedures Manual, Chapter 4, pages 100 and 101, appear to disagree with Chapter 6, page 14, regarding how Airworthiness Directives will be recorded and tracked. The actual system in use agrees with Chapter 6.

2.3.5
The Maintenance Policy and Procedures Manual, Chapter 5, page 4, item 1, makes reference to "GMM" training. There is no "GMM"; reference should read "Maintenance Policy and Procedures Manual".

2.3.6
Unable to locate where copies of one-time RII authorizations are kept on file (Reference: Maintenance Policy and Procedures Manual, Chapter 4, page 121).

2.3.7
The Inspection Procedures manual, Volume II, Chapter I, states that personnel reviewing "C" Check packages will initial in column 1 that the card was reviewed. This was not accomplished in the "C" Check package for N961R.

2.3.8
On the "C" Inspection Package reviewed, there is no traceability between "C" Check Non-Routines and the Routine card that generated the Non-Routine.

2.3.9
The Inspection Procedures Manual Volume I, Chapter 1, page 3, item 6; wording of this paragraph appears to allow maintenance personnel (Maintenance Representatives) to "N/A" inspection items with no prior approval or authorization from Quality Control.

2.3.10
The 121 Conformity Checklist, used by Emery, has no provisions for sign-offs other than the one at the end of the checklist. This does not allow accountability for any of the personnel accomplishing the various listed tasks contained on the list.

2.3.11
The Maintenance Policy and Procedures Manual appears to be mostly policy, very little procedure.

2.04 Training Programs

Description: Emery Worldwide Airlines Maintenance Policy and Procedures Manual (MPP), chapter 5, states that the Director of Quality Control has the overall

Finding 2.3.8

On the "C" Inspection Package reviewed, there is no traceability between "C" Check Non-Routines and the Routine card that generated the Non-Routine

RRXA Response

EWA's inspection program does not require the stated traceability between "C" Check Non-Routines and the Routine card that generated the Non-Routine. The Non-Routines are, however, maintained by zone location that does provide "C" Check zonal traceability.

EWA does not consider this to be a finding.

responsibility for conducting training within the Maintenance Organization of the Company. Depending on its needs, Emery uses the following types of training for Aircraft Maintenance personnel: Indoctrination, Initial, Recurrent, Special, On the Job, Quality Control OJT, and field training for both new and presently operated aircraft.

Inspection Data: Emery Worldwide Airlines Maintenance Policy and Procedures Manual Chapter 5 and Maintenance Department Training Record Files.

Findings:

2.4.1
Emery's Maintenance Policy and Procedures Manual states that indoctrination training will consist of instruction covering General Maintenance Manual overview. Emery does not use a General Maintenance Manual, Emery uses a Maintenance Policy and Procedures Manual.

2.4.2
The Maintenance Policy and Procedures Manual, Chapter 5, Page 12, does not include DC-10 training in the formal training syllabus.

2.4.3
The Maintenance Policy and Procedures Manual, Chapter 5, Page 22, does not include DC-10 on the ME001 form.

2.4.4
No formal training syllabuses noted in the Maintenance Policy and Procedures Manual or elsewhere for maintenance personnel who are given RII authorization and who do not have prior RII Authorization from other Carriers, or for Airworthiness release (AWR).

2.4.5
Training Record files are not current. Most of the files on maintenance personnel have not been updated to reflect current training status and numerous tasks such as Maintenance Service Letters, Engine Run, Taxi, etc.

2.4.6
Maintenance Service Letters training acknowledgment forms are not sent back to the training center (Reference MPP Manual). Maintenance personnel are claiming to have completed years worth of MSL training in one day in some cases when they finally do send them in.

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Finding 2.4.5

Training Record files are not current. Most of the files on maintenance personnel have not been updated to reflect current training status and numerous tasks such as Maintenance Service Letters, Engine Run, Taxi, etc.

RRXA Response

As the Manager of Maintenance Training, I disagree with the finding that Training Record Files are not current. They are, in fact, current according to the Training Certificates that the Maintenance Training Section has received, documenting accomplishment of the training.

Once the Maintenance Training Section receives any form of training report, such as M.S.L. Training Acknowledgement Form (MEO103), On-The-Job Training Certificate (MEO19), Classroom Training Certificate (MEO02) or Attendance Record (MEO89), this training is updated in our computer data base, annotated and filed in the individual's training records usually within five working days. Depending on the Training Records that were reviewed, the individual's file may appear not to be current. There could be several reasons to reflect this, such as a new employee, an individual that has not received the training for one reason or another, or in the case of MSL Training, the individual has not returned a signed MSL Training Acknowledgement Form.

Many of these Training Records are audited monthly by the Manager of Quality Control to insure the status and completeness of individual training records. From this, a by name listing of Training Record deficiencies is forwarded to all maintenance station managers and supervisors for their attention in resolving any deficiencies.

The attached letter sent to Harold Camden, November 8, 1999, provides a brief history of FAA Training Awards, Maintenance Program Achievements, FAA Inspection/Enforcement History and FAA/SPOT RAMP Inspection Results.

The AMT Training Award program was submitted again for the year 1999. A significant number of mechanics will receive FAA AMT awards, as well as, EWA will receive the "Diamond Certificate of Excellence Award" for its outstanding recognition for providing training.

The EWA Maintenance Training Section has scheduled over 2,032 formal classroom hours for the year 2000. This is not to mention the formal on-the-job training provided to the EWA Line Stations, and Aircraft Loading Manual Training (formal training schedule attached). A copy of the 2000 Maintenance Training Catalog is attached that reflects the training provided.

EWA does not consider this to be a finding.

EMERY
WORLDWIDE AIRLINES
A CNF COMPANY

November 8, 1999

Harold Camden
[redacted]
Cincinnati, OH 45226

Dear Mr. Camden:

I have put together a summary of EWA's Technical Services Department FAA Enforcement history based on our meeting November 4, 1999. As I stated in our meeting, EWA is very proud of our outstanding FAA Enforcement History record over the past then (10) years of promoting and achieving FAR compliance.

This letter will provide you a brief history of FAA Training Awards, Maintenance Program Achievements, FAA Inspection/Enforcement History, and the FAA/SPOT RAMP Inspection Results.

It is only through the effective roll of the Emery Worldwide Airlines Team, that we have and continue the successful operation as a FAR 121 All Cargo Air Carrier. Therefore this performance review is directly based on the contributions and success of the employees, in deserving,

I. FAA Training Awards - EWA Accomplishment Overview

Emery Worldwide Airlines (EWA) has received for four consecutive years, the Federal Aviation Administration (FAA) Technical Awards presented to the EWA Mechanics, Technical Service Management, Senior Director Technical Services, and Vice President and General Manager. A chronological history of the awards received to date is presented for your review.

1994 FAA AWARDS

The awards received during a ceremony on May 11, 1994 were as follows:

1. Mechanical Technical Awards

   133 mechanics were presented these awards which represented 42% of the EWA mechanics.

   This 42% or 133 mechanics actually represent 96% of EWA's full-time mechanics.

2. Organizational Awards

   The highest award, the Diamond Certificate of Excellence was presented to Emery Worldwide Airlines.

3. Master Mechanic Award

   This prestigious aviation career accomplishment was presented to Mr. Roy Deeming. The requirement of selection for this award is fifty (50) years of serving as a certificate airframe and powerplant mechanic.

1995 FAA AWARDS

1. Mechanical Technical Awards

   EWA employed 304 technicians/mechanics. Out of these, 228 or 775% have received awards. This was a 33% increase in training EWA personnel from the previous year.

   This 75% or 228 mechanics actually represent 60% of EWA's full-time mechanics.

2. Organizational Awards

   For the second consecutive year, required training percentage achieved by EWA surpasses the requirement stated in the Advisory Circular. The Diamond Certificate of Excellence requires 25% of eligible employees to be trained. Therefore in view of the great achievement of training rendered to its employees, EWA qualified itself to receive again the Diamond Certificate of Excellence.

1996 FAA AWARDS

1. Mechanical Technical Awards

EWA employment 320 technicians/mechanics. Out of these, 264 or 83% received awards. This is a 14% increase in training EWA personnel from the previous year.

2. Organizational Awards

For the third consecutive year, the required training percentage achieved by EWA surpassed the requirement stated in the FAA Advisory Circular. Therefore, in view of the great achievement of training rendered to its employees, EWA qualified and received the Diamond Certificate of Excellence Award.

1997 FAA AWARDS

1. Mechanical Technical Awards

EWA employed 338 technicians/mechanics. Out of these, 181 or 54% received awards. This is a 49% decrease in training EWA personnel from the previous year. This decrease reflects the previously accomplished extensive training provided in the previous seven years.

2. Organizational Awards

For the Fourth consecutive year, the required training percentage achieved by EWA surpassed the requirements stated in the FAA Advisory Circular. Therefore, in view of the great achievement of training rendered to its employees, EWA qualified for and received again the Diamond Certificate of Excellence Award.

AWARDS SUMMARY:

This training is a direct contribution to the continued success of EWA. We have experienced for the past nine years an average of 98% Mechanical Dispatch Reliability performance, a standard desired by many Air Carriers. EWA employees are being submitted for the calendar year 1999, to continue EWA's participation in this program.

These FAA awards exemplify EWA's professional approach to lead its employees to produce the highest level of safety possible and the most cost effective process to provide the customer the best product.

II. EWA's Maintenance Program Continues to Produce Successful Results

EWA's Continuous Airworthiness Maintenance Program (CAMP) is managed by the Maintenance Reliability Program (MRP), that outlines the means of continually monitoring the mechanical and operational performance of the entire aircraft, including the airframes, powerplants, appliances and components. The program functions under the approving authority of Operations Specification D-74.

The EWA MRP provides a means of implementing improvements to its CAMP with the objective for achieving maximum levels in safety, performance, and reliability of the EWA fleet of aircraft. This program enables EWA to manage and control it's own maintenance program by providing approved and acceptable means for adjusting maintenance/inspections intervals, component overhaul limits and changing primary maintenance processes and/or tasks.

EWA's Maintenance Program is tested by other means than it's Mechanical Dispatch Reliability that has maintained 98% average over the past nine years. EWA has gone through several very in-depth FAA/DOD/Outside Firms inspections over the past nine (9) years. The successful results of these inspections continued to reveal EWA's ratings to be higher than the Industry performance of the 121 Air Carriers and average to excellent ratings from the Department of Defense (DOD).

In 1992, EWA went through a very in-depth FAA NASIP Inspection to which EWA rated 64% higher than the Industry performance of the 121 Air Carriers. EWA received honorable recognition for this achievement from the San Jose FAA Certificating Holding Office Manager.

In 1995, EWA received a specific FAA inspection that was administered by FAA Washington, DC to be accomplished on all 121 Air Carriers in 1995. This inspection was titled a Regional Aviation Safety Inspection Program (RASIP). This inspection lasted ten days and covered the Operations/Maintenance Departments. On June 22, 1985, the FAA RASIP team provided EWA Senior Management a debrief of their findings. The team reported that their inspection did not reveal any major discrepancies and overall EWA was above average in performance.

In 1997, EWA received a comprehensive Internal Evaluation performed by the SH&E International Air Transport Consultancy. This evaluation was performed based on the FAA NASIP items to ensure EWA has adequate systems and controls in place to support the growth of the airline. A report was provided to EWA Senior Management from the SH&E team that reflected an excellent rating of the Technical Services Organization. Their report specifically reflected that all aspect of the necessary systems and controls were in place and performing excellent ratings.

In 1999, EWA received a specific FAA inspection that was administered by the FAA Western Pacific Regional Office. This inspection was titled a Regional Aviation Safety Inspection Program (RASIP). This inspection lasted five (5) days and covered the Operations/Maintenance Departments. The special emphasis of the inspection was cargo handling. On March 15, 1999, the FAA RASIP team provided EWA Senior Management a debrief of their findings. The team reported a total of twenty-one (21) findings. The SJC FAA FSDO issued four (4) letters of investigations based on the subject findings. EWA responded to all findings on April 30, 1999.

EWA Technical Services Department has gone through four Department of Defense (DOD) inspections in the past nine years. We received average to excellent ratings on all inspections.

EWA's Maintenance Program success is a direct result of true team effort promoting synergy.

III. FAA Inspection/Enforcement History

Another indicator for EWA's performance is reflected by the low number of FAA Enforcement Actions received. The following data provides an analytical summary of this performance.

EWA MAINTENANCE PERFORMANCE BASED ON FAA SAFETY INSPECTION/ENFORCEMENT HISTORY

YEAR	# ADMIN ENFORCEMENT'S	FAA NPTRS	FLEET SIZE	FLT HOURS	CYCLES	PILOT REPORTS
1990	4	Ref. Total	7	11,070	4,732	3,679
1991	3	Ref. Total	20	28,095	12,565	10,512
1992	3	Ref. Total	29	40,606	20,559	17,196
1993	2	Ref. Total	29	42,473	20,718	15,442
1994	1	Ref. Total	37	52,465	23,704	16,667
1995	2	Ref. Total	37	55,178	25,169	16,280
1996	1	Ref. Total	39	57,994	23,960	15,284
1997	0	Ref. Total	43	62,405	28,127	15,760
1998	1	Ref. Total	43	68,140	32,561	22,061
*1999	0	Ref. Total	41	50,851	25,828	18,472
Totals	17	5,493		469,277	217,923	150,354

* As of the end of October 1999

EWA PERFORMANCE FACTORS SUMMARY - 1/90 THROUGH 10/99

- EWA's FAA Administrative Enforcement's are minor in numbers as represented during 1990 thru October 1999. During this approaching ten (10) year period of Air Carrier Operations, EWA Technical Department experienced the following:

  FAA Administrative Enforcement's compared to # of Safety Inspections = .3%
  FAA Administrative Enforcement's compared to # of Flight Hours = .004%
  FAA Administrative Enforcement's compared to # of Flight Cycles = .008%
  FAA Administrative Enforcement's compared to # of Pilot Reports = .01%

- EWA increased its fleet size by 22% in 1994 and decreased its number of PIREP's per flight hour by 5%.

- EWA increased its fleet size by 6% in 1996 and decreased its number of PIREP's per flight hour by 3%.

- EWA increased its fleet size by 10% in 1997 and decreased its number of PIREP's per flight hour by 10%.

- EWA increased its flight hours by 9% in 1998 and decreased its number of PIREP's per flight by 25%.

ENFORCEMENT ACTION SUMMARY:

EWA Technical Services has received a total of seventeen (17) FAA Administrative Enforcement Actions, to which three (3) were civil penalties (totaling $74K) in the past ten (10) years. The three civil penalties were:

1. $50K, Pilot static check, violation of 43.13(a)
2. $15K, Cargo line tape, no FAR violations
3. $ .9K, Missing cargo light covers, violation of 121.153(a)(2) and 43.13(a)

EWA has operated an average of thirty-two (32) aircraft a year during this ten (10) year period. A total of 469,277 flight hours and 217,923 cycles has been operated during this period. EWA's enforcement record compared to total flight hours equates to .008% and cycles to .004%.

EWA Technical Services received twenty-two (22) Letters of Investigation from October 1998 to date from the SJC FSDO. Three (3) were closed with no action and five (5) were consolidated into one (1). To date, EWA Technical Services has fourteen (14) open LOI's.

IV. FAA/SPOT RAMP Inspection Results 1998

EWA incorporated an airline industry standard "FAA Spot/Ramp Inspection Procedures" into our Maintenance Policy and Procedure Manual (MPP) in 1995.

The purpose of this program was to enhance EWA's Continuing Analysis and Surveillance System (FAR 121.373) for the continuing analysis and surveillance of the performance and effectiveness of its inspection program and the program covering other maintenance, preventative maintenance, and alterations and for the correction of any deficiency in those programs.

It also provides direct support to FAR 119.59 to assure that EWA properly handles FAA Inspector contracts, and expedites the handling of any FAA request for information.

In 1998, 78 FAA Station Inspections of the EWA's 43 line stations were reported. A total of 173 minor findings was noted and corrected. This number of findings reflected 70% of the inspections resulted in an average of 2 write-ups per visit, and 30% no findings.

This audit performance continues to reflect EWA's compliance of FAA regulations and company policies and procedures.

I trust this information will assist you in being introduced to EWA. We as a company look forward to the support of you and your staff.

Sincerely,

Thomas M. Wood
Director Quality Control

cc: Rene' Visscher
Technical Service Directors
Quality Control Managers

TMW/lc

Comments:

The basic overview of training by the inspection team is that training at Emery appears to be very limited and sparse. Based on the data reviewed by the team, there does not appear to be any formal classroom type training except for Basic indoc and approximately 5 other systems courses. The bulk of the training activity appears to center around previous employer training, the maintenance service letter distribution program and any on the job type training that is documented. This lack of structured training became evident when the log write-ups and log pages were reviewed. There are numerous repeat write ups which seem to reoccur after they have been signed off as corrected. The ability to troubleshoot the write ups and come up with a successful fix on the first occurrence of a problem is rare.

The team recommends that Emery enhance its maintenance training program to include more formal training courses, and move away from reliance on the Maintenance Service Letters program as the apparent main source of training.

2.05 Record Systems

Description: The Emery Aircraft Records Section is located at the Hub in Dayton, Ohio. The Department functions under the Director of Quality Control. All maintenance affiliated paperwork is promptly forwarded to aircraft records on a daily basis. Line Maintenance Administration/Data Entry Section enters all write-ups from the log pages into the EWA Computer system and reviews and audits entries made by line stations. Aircraft records maintains files of current historical records, Ad Notes, filed as repetitive or terminated, Parts tags, filed by ATA, engine position, emergency equipment, and time controlled and life-limited items as well as aircraft and engine inspection records. The Time controlled and life limited items are tracked in the EWA Computer and a print out is maintained in each aircraft record file drawer. Detailed Policies and Procedures of the EWA record keeping system are located in Chapter 6 of the Maintenance Policy and Procedures Manual.

Inspection Data: Numerous B-Check packages and Aircraft Logbook entries

Findings:

2.5.1
EWA is not following their manual in completion of "B" Check paperwork sign-offs and "N/A" procedures.

2.5.2
Completed "B" Check paperwork indicates it was inspected by Quality Control; however, team inspectors found numerous items that were incorrectly filled in or not filled in at all.

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Finding 2.5.2

Completed "B" Check paperwork indicates it was inspected by Quality Control, however the team inspectors found numerous items that were incorrectly filled in or not filled in at all.

RRXA Response

The referenced finding was not confirmed during our review with the FAA CVG Principal Inspectors. However, as a proactive step to improve this process, EWA Quality Assurance Manager provided additional recurrent training to the Inspection Representatives.

All Quality Control/Quality Assurance Inspection Representatives have reviewed the EWA IPM Volume I, Chapter 1, Volume II, Chapter 2, Volume III, Chapter 2 and Volume IV, Chapter 1 for procedures for control and handling of EWA B, C, and D Checks, which also include procedures for stamping and routing of work packages. (See attached Training Form examples)

EWA does not consider this to be a finding.

EMERY WORLDWIDE AIRLINES (RRXA558B)
RASIP Response (Airworthiness)

Finding 2.12.3

The Emery Reliability Program does not appear to be tracking components. (Reference Order 8300. 10 Vol. 2 Chap. 66)

RRXA Response

The component performance is tracked through the Reliability system overpar program. Trends are identified and corrective actions are recommended.

The FAA CVG PMI is working in concert with EWA Quality Control in performing identified manual reviews, which may need to be improved as per the letter, dated April 6, 2000, prepared by the CHDO.

EWA does not consider this to be a finding.

2.11.3
The Emery Time Limits Manual contains part of the Operators Maintenance Program. This Manual is not included in Paragraph D-72 of the Operations Specifications.

Comment

Based on the team's observations, it appears that the DC-10's were placed in operation without first ensuring that adequate maintenance support was in place (i.e. parts, personnel training, references in company manuals to DC-10 operation, etc.). In particular, the aircraft appear to have been placed in scheduled operation without consideration to existing maintenance discrepancies; one aircraft (N68041) having been operated since delivery with chronic problems on multiple systems. During the course of the team's visit, the aircraft was continued in operation with chronic autopilot, pressurization, thrust reverser and navigation problems. Though the company appeared to address these issues between flights, their efforts to correct these discrepancies, in most cases, were unsuccessful. At the completion of the team's visit, the aircraft was scheduled to continue operation with problems still existing (deferred). The company did not give any indication to the team that the aircraft would be taken out of service for any extended length of time to finally correct these chronic problems.

2.12 Reliability Program

Description: The operation of the Emery Maintenance Reliability Program is contained in the Reliability Manual document No. EWA-51990. The Program tracks Unscheduled Engine removals, Engine shutdowns for cause, Delay and cancellations, and pilot reports. A monthly fleet reliability report is published that provides various statistical data depicting the actual operational performance of the aircraft and powerplant systems.

Inspection Data: Monthly Reliability Fleet Report, Monthly Reliability Meeting, Reliability Manual Document No. EWA-51990 and interview with the Manager of Reliability.

Findings:

2.12.1
The definition section contained in the Reliability Document does not contain definitions for some of the terms used frequently throughout the document.

2.12.2
The Data collected to be analyzed includes only non-routine items recorded in the aircraft logbook. The data source of non-routine items that are not in the log book are not used.

2.12.3 → next pg

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The Emery Reliability Program does not appear to be tracking components. (Reference Order 8300.10 Vol. 2 Chap. 66)

2.12.4
There appears to be no performance standards calculated for use in flagging of delays and cancellations. (Reference Order 8300.10 Vol. 2 Chap. 66)

2.12.5
The Action Notices that were reviewed did not identify what finally fixed the problem.

2.12.6
The Reliability Action Notice Summary was not being used as described in the Reliability Manual Chap. 6 page 3. (Team was supplied with a draft of Rev. 8 to the Document which corrected this item.)

2.12.7
EWA has only issued 11 Action Notices in the previous 12 Month period. Given the size of the fleet and the amount of discrepancies that were observed during the course of this inspection through review of log write-ups, this appears rather low.

2.13 Maintenance Inspection System and Required Inspection items

Description: The Emery Worldwide Airlines Inspection System is described in chapter four of the Maintenance Policy and Procedures Manual. The Quality Control (QC) Department is responsible, through the use of Inspectors and RII Inspectors, to ensure that all maintenance is performed in accordance with the FAR's, the Emery maintenance manual, and any manufacturer's maintenance or overhaul manual. The Director of Quality Control serves as the Chief Inspector for the purposes of 14 CFR 119.65. The company has 138 RII Inspectors, 1 Aircraft QC Inspector, 3 QC Inspectors, 3 QC Representatives, and 3 Quality Assurance Representatives.

Inspection Data: Maintenance Policy and Procedures Manual (Rev 20 dated 7/31/98 and draft Rev 21); Aircraft log pages for N8079U, N950R, and N68041 for the period 11/17/99 - 12/31/99; completed "B" Check packages for N500MH (12/22/99), N801GP (1/5/00), N605AL (8/26/99), N997CF (12/29/99), N993F (1/12/00), N990CF (12/10/99), and N950R (1/13/00); Authorized Maintenance Personnel Listing dated 1/13/00; and Interview with the Director of Quality Control.

Findings:

2.13.1
The DC-8 and DC-10 Inspection Programs do not address testing of FDR expanded parameters.

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2.13.2
DC-8 "C" Check card 4514 is titled "Functional check VHF NAV and COMM, Compass system". This card covers considerably more than indicated in the title/description; includes TAT/SAT, Captains Altimeter, KIFIS System, GPWS, and Altitude Alerter. Recommend enhancing title/description.

2.13.3
Unable to locate where the DC-8 Air Data System is tested (other then self-test) on a regular basis.

2.13.4
Numerous steps on the DC-8 C- Check card # PRE10 require the following; "functionally check, functionally test, or perform self-test" without any procedures or reference to where procedures can be found listed on the card.

2.13.5
Unable to locate the "check and reset barometric altimeter" procedure cited on "C" Check card 4509 item #7.

2.13.6
Unable to locate a "C" check card for inspection of the UNS-IDFMS as required in the Time Limits Manual.

2.13.7
"C" Check card #PRE10, step 29 calls for a functional test of the Flight Data Recorder "using the test set and STC-3166SO Appendix D, part A test plan 92-01-01. This procedure doesn't appear to apply to the following aircraft; N500MH, N997GE, N8076U, N8079U, N8084U, N8085U, N8087U, N8091U, N832AL, N873SJ. Unable to locate a procedure which applies to these aircraft.

2.13.8
Unable to locate procedures covering lost inspection stamps in the Maintenance Policy and Procedures Manual.

2.13.9
The team was unable to locate any criteria that is used for recurrent training of RII authorized individuals.

2.16 Major Repair and Alteration Conformity

Description: The Emery Worldwide Airlines Maintenance Policy and Procedures Manual, chapter 4 section XIII contains Maintenance authorization (MA) policy and procedures. The Maintenance Authorization (MA) form MEO24 is one of the documents EWA uses to document major repairs and alterations.

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EMERY WORLDWIDE AIRLINES (RRXA558B)
RASIP Response (Airworthiness)

Finding 2.13.9

The team was unable to locate any criteria that is used for recurrent training of RII authorized individuals.

RRXA Response

EWA performs recurrent training of RII authorized individuals by formal classroom and Maintenance Service Letters (MSL) per the M.P.P., Chapter 5, page 5, item 3. An example of this training was performed by MSL 99-10 (reference attachment).

The FAA CVG PMI is working in concert with EWA Quality Control in performing identified manual reviews, which may need to be improved as per the letter, dated April 6, 2000, prepared by the CHDO.

EWA does not consider this to be a finding.

(10) Structures	Rig/Adj	Repair	Alter	Replace	Reinstall
(a) Primary structure components and their attachments, including fasteners.	-	*/1	*/1	X	X

Examples: Major repairs to fuselage frames, skin, pylon, spar web, wing skin. Replacement of stabilizers, wing bottle bolts, stabilizer attach bolts.

(b) RVSM critical areas	X	X	X	X	X
(c) DC10 No. 1/3 Wing Pylon, Nose, Fan & Core Cowls	-	*/6	-	*/6	-

(11) Misc	Rig/Adj	Repair	Alter	Replace	Reinstall
(a) Upon completion of aircraft weighing	**Note:** Verification of weights.				
(b) Temporary replacement of all rigid hydraulic tubing with flexible hose		X		X	X
(c) Windshields				X	X

C. **REQUIRED INSPECTION PERSONNEL.** All required inspection items will be inspected and approved by Quality Control Inspectors, RII Inspectors (Authorized or Limited) in accordance with the details contained in the EMERY WORLDWIDE AIRLINES Aircraft Maintenance Manual or the Manufacturer's Manual, Service Bulletins and/or Airworthiness Directives. In addition:

(1) No person shall be assigned responsibility for inspection of a Required Inspection Item in which he has accomplished the work involved.

(2) No person shall be assigned to inspect a Required Inspection Item unless he is properly certificated, trained, qualified and authorized in writing by the Director of Quality Control to accomplish such inspection.