

**Attachment 6**

**to Organizational Factors Group Chairman's Factual Report**

**CHI04MA182**

**National Transportation Safety Board  
Office of Aviation Safety**

**CHI04MA182**

**Organizational Factors**

November 23, 2004

**Interview Summary: Principal Maintenance Inspector**

Location: FAA FSDO  
17777 N. Perimeter Dr. Ste 101  
Scottsdale, AZ 85255

Interviewers: Georgia Struhsaker NTSB NWRA, Seattle, WA  
Aaron Sauer NTSB CMRA, Denver, CO  
Robert Drake FAA AAI-100, Washington, DC

Interviewee: Mr. Craig Roberts FAA, Principal Maintenance Inspector

During the interview, Mr. Roberts stated the following:

He received his A&P certificate in 1972. He went to A&P school in upstate NY. From there he worked for a Part 121 operator, first in Binghamton, then in Allentown, PA. He set up a maintenance base. He then went to Lynchburg, VA with another regional carrier, an American Eagle carrier, Flagship. From there he transferred to Nashville TN. In 1997, he joined the FAA in Nashville, TN.

Air carrier positions he held included mechanic, director of maintenance, director of maintenance training, power plant engineer, maintenance controller, and senior inspector.

He was a geographic inspector for 3 or 4 years. Then he switched to certificate management. He was assistant PMI for a Part 121 air carrier, Corporate Airlines. At the same time he was assistant PMI for 4 Part 145 repair stations.

He transferred to Scottsdale in August 2002. He transferred under a hardship request. He started as Safety Program Manager (SPM). The SPM for airworthiness was the only position open at the time. He did the SPM work for about 1 year, then for a few months he was assistant PMI to another principal PMI. Then he was assigned to assist another inspector who was terminally ill. Two to three months later, around February or March 2004, he took over for the ill PMI.

Complexity refers to the group of certificated businesses an inspector is assigned for oversight. This includes repair stations, Part 91 MELs, Part 135, etc. Each certificate has points depending on complexity, and the total complexity determines grade level.

His complexity includes 3 Part 135 air carriers, AEX Air, Med Trans and Tucson Aero Service Center; 1 Part 133 external load operator, Salt River Project; 1 Part 141 school, Tucson Aero Service Center; and 13 Part 145 repair stations. He also oversees 1 DAR and a number of IAs. His point total is approximately 2600+, FG-14. In addition to the complexity group, there is on demand work, enforcement duties, and accident investigation.

Med Trans is his only air ambulance operator. The amount of time devoted to Med Trans is 5 to 7% of his entire workload.

He took over the already existing plan for FY04 – AD compliance checks, facility inspections, ramp inspections, and records review items that needed to be completed. Prior to the first accident, he had developed rapport with the DM and DO, reviewed the manuals, and was trying to get up to speed on them. He was doing this at the same time he was trying to get up to speed on other operations.

Following the March 21 accident, he was on the phone with Russ Braddock. He wanted to monitor what was going on. He spoke with Mark McDoggall, Airworthiness Inspector with the Lubbock FSDO. Mark was keeping him informed. The aircraft in Odessa was replaced. The new aircraft had a loaner engine from Dallas Airmotive. Mark had questions about an AD for repetitive inspection that was signed off. He spoke with Russ and the Asst. DM Ed, and they sent the paperwork they had. Med Trans had Dallas Airmotive get them more documentation. He has since suggested that Med Trans have a copy of all AD compliance info at each base, with the originals in Tucson.

He believes he made a visit to Tucson for a facility inspection and ramp inspection, also spot reviews of aircraft records, between the first and second accidents. He went with Dave Baron who is the PAI. The only discrepancy was an airworthiness certificate that had the previous registration number on it. He made note of that and got it rectified.

The FAA notifies when they are going to do an inspection. He has plans to meet with Russ Braddock later this month or next month. Russ is to come to the FSDO one day, and he and Dave Baron will go to Tucson the next day.

Russ came to the FSDO for 2-day industry ops spec training in the summer of 04. Bert also attended. This was the first time he met Russ in person. Industry ops spec program is a computerized program where a company can make changes to their ops specs, notify the FAA, FAA can compare old to new, and sign off on the changes. It eliminates a lot of mailing back and forth. The program is not mandatory, but is recommended. It is currently available for Part 135 certificates, soon for Part 145s.

He first learned of the second Med Trans accident via the media. He contacted Russ Braddock and told him to secure records for the investigation. He found out Russ was going to the accident site. The decision was made by FSDO management to do an office in depth investigation of Med Trans.

The inspectors assigned were Dave Baron-airworthiness, Will Willbanks-operations, plus 4 others, for a total of 6 inspectors. All were assigned different areas to look at. The inspection was conducted at the Med Trans base in Tucson. All the inspectors went to Tucson and spent two days. Also information was requested from geographic inspectors.

Dave Baron prepared the maintenance part of the report. Will Willbanks prepared the operations part of the report. Ron Rosenhahn, Operations Unit Supervisor, compiled the findings and published the report.

Concerning the maintenance findings, some were typographical in nature, and there were inconsistencies between the manual and the ops specs.

He had been discussing the AAIP with Russ for some time. They needed to update the inspection program for the 407s. Russ will deliver the updated inspection program when he visits the FSDO.

Some of the info from the inspection was news to him. The number of findings surprised him. When you take over a certificate, you assume that the manual and ops specs were all correct from certification. Doing a detailed review is not the first thing that you prioritize.

He got no briefing from the previous PMI about any operator he acquired. The previous PMI was not physically able to provide the briefings. Standard procedure would have been to get briefed by the previous PMI.

He is in contact closely with Russ on the AAIP. They are also communicating about a proposed new logbook sheet.

He spoke with Dave Baron (PAI) about Med Trans when he first took over the certificate. Dave said that Med Trans in his experience was compliant with no enforcements. Dave also said that their mechanic in Tucson, Pete, was a very knowledgeable individual. He does not recall a specific conversation with Charlie Prince (POI) about Med Trans.

The Med Trans response to the FAA letter following the inspection was not adequate. Russ interpreted two findings as being the same, but they were not. There were a few explanations that he did not feel were a corrective response to the findings.

He met Ed, the Asst. DM for Med Trans, in Tucson last week.

The FAA would like to see all the records in Tucson. The FAA can request that all records be kept in Tucson. Med Trans can resist. Personnel training records do not have to be kept at the base in Tucson. The rule says maintenance records must be made available; it does not specify where they are to be kept. Some things Med Trans responds to and some things they do not.

There are difficulties presented by the Med Trans set up. Most air carriers have a central location for most of their fleet. Med Trans has bases spread out across the country.

He has no previous experience with helicopter operators or air ambulance operators. FSDO also has the Native Air certificate. Native Air is an EMS operator. Med Trans is spread out more than Native Air, which has most of their fleet in Phoenix.

He has inspected two Med Trans aircraft. He has never had the opportunity to inspect others. These two are the one based in Tucson and another aircraft that was brought in to use for training last week. He would like to see more of them.

Changes to FAA Order 1800.56E now allow a certificate holding FSDO to add Required (R) items for geographic inspectors. R items are created at the FSDO and sent to a RAMPS coordinator at regional headquarters. The RAMPS coordinator generates R items for the geographic inspectors. (Reference FAA Order 1800.56E, Appendix 1, 3, c. Med Trans category is a Part 135 operator, 9 or less passenger seats.)

The entire Scottsdale FSDO is going to adopt use of the new provision in the Order. They are going to look at all operators that fit geographic concept and plan on using that provision for all of them. They should be able to use new provision this FY. They are planning to do this in the near future.

A work plan starts with R items. A number of other items are added to build up the time. There is a minimum hour requirement or average time for each item. The total is 630 hours. Items for this year for Med Trans include a Med Trans facility inspection in Tucson – a full nuts to soup inspection. This will be done separately from the visit with Russ in the near future, which is a special inspection. He just completed 2 ramp inspections and 1 records inspection on one of their aircraft.

He is aware they are closing down McCook and opening in C. Springs. Nine months ago he probably would not have been informed. There is a much better understanding now between him and Russ than there was 9 months ago. This better understanding is because of regular interaction with Russ – not specifically because of the accidents.

He has received no helicopter training since joining the FAA. He is not scheduled for any training regarding helicopters.

His training since coming to FAA included indoctrination training, Part 145 certification and surveillance, evaluation of certificate management personnel, composite repairs, computer based instruction on topics from emergency procedures to surveillance of Part 129 air carriers, and NDI. He has attended at least 10 or 12 separate training classes ranging from 4 days to 2 weeks per class.

He does have the opportunity to ask for training and provide input into his training program. Out of agency training is very popular, and there is a quota. Only a few nationwide get to go. His interest in taking 407 manufacturer training is at the top of the scale.

Despite his lack of helicopter maintenance background, he feels he can adequately supervise his helicopter operators. If he has specific question about maintenance, he can ask the mechanic or Russ to inform him of what is going on. The FSDO has manuals. There are other inspectors in the office who have helicopter experience. For example, when there was a tail rotor hangar bearings issue with the 407, he discussed it with Charlie and Russ. Every aircraft has its Achilles heel.

His desires for geographic inspections would be facility inspection, ramp inspection, mechanic inspections, have the inspector get to know the mechanic working on the aircraft.

He would like to see more centralization in Tucson of Med Trans documentation and management personnel.

Russ is always accessible.

Whenever he goes to Tucson, he visits Med Trans. Dave was scheduled to go last week and they coordinated visits. He also visited American Turbo and Tucson Aero Services. He also visited at the end of September and did AD compliance checks and another records inspection.

*During Sept and Nov inspections did he note any discrepancies?* He noted an Excel spreadsheet error, the formulas in some cells to calculate % of time left on components were messed up and giving 100% erroneously. Also, some of the initials of the individuals signing off inspection checklists were not legible.

He gives Med Trans an A grade for their maintenance. A number of times he has called Russ on his cell phone and found he was not in Bismarck, he was at a maintenance base. Russ is in tune with his people and has a handle on the goings on. Russ tells him he is not happy with this or that. This indicates Russ is concerned, not complacent.

*Is his general workload manageable?* He achieves the majority of items in his work plan. Right at the time he came on as PMI, there was a major change in Part 145 involving all manuals. He was also out of the office for 1 month for surgery from May into June. He does not feel overworked, but he is staying on his toes. They could use

more inspectors. The area is a hot bed for aviation; a lot of certificates are held at the FSDO.

He was on annual leave when the in depth investigation was done. If not on annual leave, he would have participated in the inspection