

Attachment 27. PAI Record of Conversation

DCA12MA020 Maintenance Factual Report



RECORD OF INTERVIEW

Kristi Dunks
Senior Air Safety Investigator

Date: January 17, 2012

Person Contacted: Mr. James Brownell, FAA Principle Avionics Inspector

Accident: DCA12MA020

Present:

Kristi Dunks, Maryam Allahyar- NTSB

Brook Lewis- FAA Chief Counsel

Tony James- FAA AVP-100

The PAI for Sundance Helicopters, Inc. was interviewed via telephone on January 17, 2012. The following is a summary of that discussion.

The PAI obtained his airframe and powerplant (A & P) mechanic certificate in 1989 and holds an Inspection Authorization issued in 2006. He began work at Chaparral Airlines from 1989-1991 and then moved to Mountain Air Cargo from 1992 until August 1998. In 1998, he became the chief inspector for Eagle jet Charter, which later became Scenic Airlines. He then became the Director of Quality Assurance at Scenic Airlines. In 2005, he began work at NS Technologies and completed Bell 412 training at the factory.

In September of 2006, he obtained employment as an aviation safety inspector at the Las Vegas FSDO as a general aviation maintenance inspector. In April 2011, he was reassigned as a general aviation avionics inspector. He indicated that he has not had any helicopter-specific training since coming on board with the FAA. The PAI served as the PMI for Sundance from October 2010- April 2011. He then became the PAI overseeing their 135, 133, and 137 certificates. He indicated that his relationship with Sundance has always been professional. In his work as PAI, he oversees the following: 2 - Part 125 Air Operators, 3 - Part 133 and Part 137 Air Operators, 9 - Part 135 "9 or Less" Air Carriers (6 of which are Air Tour Operators), 2 - Part 135 "10 or More" Air Carriers (both are Air Tour Operators),

and 9 - Part 145 Air Agencies. The PAI described his workload as busy, but he is able to perform his job requirements. He plans his work program into each month.

The PAI works a compressed work schedule, working five days one week and four days the other. He generally works 40 hours per week although he generally puts in extra work hours when he is attending training. This happens about three times per year and during those weeks, he generally works an additional 8 hours of unpaid time per week.

The PAI indicated that each year for his operators, he evaluates their risk in SPAS. SPAS has an index that has default risk values. Although he is able to change them, he leaves them the way they are set. The PAI analyzes risk compared to SPAS and then adds the findings as he completes activities. He also reviews previous surveillance activities. The PAI described his work as identical to the PMI, except for he is more involved in avionics type of work. He also looks at the operators' inspection programs in relation to avionics installations.

For the past few two fiscal years, the PAI reported the following R and P items for Sundance Helicopters. Since they were considered a low risk operator, he had not completed any inspections for FY 2012. The following R and P items were reported:

Table 1. R and P Items

	R-items	P-items	R-items complete	P-items complete
FY 2011 (as PMI)	1	11	1	11
FY 2012	0	6	0	3

The PAI reported that following the accident, the surveillance of Sundance has increased. On January 5, the PAI completed three off-hour ramp checks. He was not aware of any recent letters of investigation or enforcement actions. He was aware of a recent corrective action that involved a voluntary disclosure of the operator on a life-limited component (Main Rotor Servo) on the helicopter exceeding its time. The VDRP process was initiated on 01/12/2011 and completed on 02/24/2011 which resulted in a comprehensive fix to add a mandatory monthly audit of all hard time components. Sundance put procedures in place to correct the problem. The PAI was aware of an in depth inspection being organized by the FSDO manager that would involve four

inspectors from the LAS FSDO. The PAI, FSDO manager, and representatives from Sundance did meet to discuss the FAA's increased surveillance and ideas on how things could be changed to improve safety. The PAI indicated that Sundance was very responsive when problems were identified, although the PAI did not ever have any specific findings.

The PAI stated that it was his opinion that required inspection items (RIIs) should be mandatory for 9 or less operators such as air tours that operate the number of hours that Sundance operates. He also indicated that SMS programs should be implemented. He indicated that with the number of hours the operators operate, more critical safety requirements should be required.