

**DOCKET No.: SA-521**  
**EXHIBIT No. 17R**

**NATIONAL TRANSPORTATION SAFETY BOARD**  
**WASHINGTON, D.C.**

**Correspondence from Abramski to Emery**

**(58 pages)**

April 29, 1998

Emery Worldwide Airlines  
Mr. Thomas M. Wood  
Director, Quality Control  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Wood:

On April 20, 1998, an Enroute Inspection was conducted on an Emery Worldwide Airlines (EWA) DC-8 aircraft, N988CF, Flight 009, San Jose/Dayton, by Inspector Wilbert J. Robinson of this office. In addition, a Maintenance Facility Inspection was conducted by this same Inspector at the EWA New Orleans, Louisiana (MSY), maintenance facility. Accordingly, two issues have evolved as a result of these inspections:

- 1) It was noted by Inspector Robinson and verbally communicated to the flight deck crew that the left side aft most cockpit side window appeared crazed and distorted.
- 2) Inspection of the EWA New Orleans maintenance facility revealed that EWA maintenance personnel were not stationed at this facility. Rather, the EWA maintenance requirements were attended by Ryan International Airlines mechanics as per a contractual agreement.

As you are aware, Revision 19 to the EWA Maintenance Policy & Procedures Manual dated November 12, 1997, revised the status of this maintenance facility from a Class III facility, wherein contractual agreements between EWA and other maintenance providers are the norm; to that of a Class II facility, wherein EWA personnel are staffed. Therefore, a clarifying amendment to the Maintenance Policy & Procedures Manual, Chapter 2, is hereby requested regarding maintenance personnel staffing.

①

Should you have any questions regarding these issues, please call at your convenience.

Sincerely,

**ORIGINAL SIGNED BY**



Joseph A. Abramski  
Principal Maintenance Inspector

cc: Richard Jacobson - EWA  
Richard Hickey - EWA  
W.J. Robinson - FAA  
File: 8320-1.09  
WP: C:\My Documents\Wood430

M7:J.A. Abramski:JAA:(408) 291-7681 [REDACTED] 4/30/98

July 31, 1998

Mr. Charles R. Peck  
Manager, Reliability Department  
Emery Worldwide Airlines  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Peck:

This correspondence will confirm our meeting in this office on July 21 and 22, 1998, regarding the Emery Worldwide Airlines (EWA) Maintenance Reliability Program, Document No. EWA-51990, and its associated Revision #8, dated January 15, 1998, as submitted. It will also serve to acknowledge receipt by this office of the proposed EWA DC-10 aircraft maintenance program utilizing the MSG 3 process. Present at this meeting was yourself, accompanied by Mr. Jim Feisley, EWA Technical Analyst; Principal Avionics Inspector Nick Pearson; Assistant Principal Maintenance Inspector Larry Moheit; Aviation Safety Inspector Roger Sigg; and the undersigned.

The essential discussion in this meeting however, concerned the EWA Maintenance Reliability Program and its incumbent issues; a synopsis of which follows.

EWA Maintenance Reliability Program Revision #8

A detailed page by page review of this document was accomplished at this meeting. As you are aware, this revision was disapproved primarily for the following reasons:

- 1) Insufficient procedures accompanying the policy contained therein.
- 2) Insufficient total maintenance organizational structure to support the considerable autonomy that this revision would grant. Given the complexity of the Reliability Program and its incumbent responsibility, the absence of a complementary industry standard organization encompassing Engineering, Maintenance Programs, and comprehensive Technical Publications departments inhibits the ability of a proactive and aggressive approach to maintenance program controls.

- 3) Insufficient Reliability Department personnel to consistently analyze, evaluate, and address acquired data relative to the complexity of the EWA aircraft fleet composition with its varied maintenance processes and programs.
- 4) Contradictory and conflicting statements regarding policy, methods, and procedures.
- 5) Reliability control methods and the data collection system requires expansion.
- 6) The EWA Maintenance Review Board judicial members requires expansion.  
Given the responsibilities and duties assigned the Directors of Line Maintenance and Heavy Maintenance, these positions should be included as sustaining judicial members.
- 7) Several Federal Aviation Regulation references require revision or incorporation.

#### CURRENT EWA MAINTENANCE RELIABILITY PROGRAM

In addition to a review of the aforementioned Revision #8 document, several aspects of the current EWA Maintenance Reliability Program were addressed.

- 1) Although part of the data collection analysis and application system, the monthly published Fleet Reliability Report does not reflect Corrosion Prevention and Control findings.
- 2) Chapter 7, Page 2, Paragraphs C. 4. And D. 5.; do not reflect the correct percentage of allowable escalation limits as stated in Operations Specifications D76. This escalation limit was not submitted to this office for approval; nor can archived documentation be located to substantiate the limit.
- 3) The absence of maintenance program and/or process changes attributable to Reliability Program analysis when identifiable requirements are apparent.  
As discussed, perhaps this is due to Reliability Analysts involved with, and performing, a multiplicity of other tasks.
- 4) Your letter dated June 1, 1998, accompanied by the EWA Maintenance Review Board approvals, and your memorandum dated April 14, 1998, concerning the Reliability Program Alert Level Recalculation for the DC-8 fleet provoked the following response:

- a) Although there is no Regulatory issue involved in using more than one year of data to compute the Alert Levels, there is a requirement in the Reliability Program document for FAA approval when procedures relative to performance standards are changed; and for any adjustments to performance standards which exceed the calculated standards. The change involved utilizing thirty six (36) data points (which is representative of thirty six months of data) as the new calculation versus the twelve (12) data points (months) used previously in establishing performance standards and control limits; thus requiring FAA approval. In addition, please note that this is the second time a change to the Reliability Program has occurred without FAA approval. The previous occurrence was discovered in February of this year during a review of the Fleet Reliability Report data. A revision to the Reliability Program was subsequently submitted and approved after inquiry which concerned Chapter 6, Paragraphs B. 3. and B. 5.; of which were previously amended on July 30, 1997.
- b) The Reliability Program document does not incorporate deviations in the program for different types of fleet aircraft. Only one Reliability Program exists for the EWA aircraft fleet. The elective thirty six data points utilized in the performance standard calculation applies to all fleet aircraft types including the former EWA Boeing 727 aircraft, and the forthcoming Douglas DC-10 aircraft, which will be prohibited from representation in the Reliability Program for that time frame until sufficient data is accumulated.
- c) Although a part of the Continuous Analysis and Surveillance Program (reference FAR 121.373), there does not exist any Regulatory Requirement for a Reliability Program. However, once a Reliability Program is negotiated between the air carrier and the FAA Certificate Holding District Office (CHDO) as allowed under present FAA policy, the Reliability Program is represented in the air carrier's Operations Specifications, wherein it now becomes the duty of the air carrier to maintain its Operations Specifications (reference FAR 119.43), and is thus a Regulatory matter.
- 5) Although revision to the Reliability Program document has occurred and discrepancies in content have been identified, it is expected that the necessary written revisions to the document are forthcoming for review and FAA approval.
- 6) The degree of difficulty in utilizing one standard deviation point in the alert level formula as applied to an older aircraft fleet is recognized. It was agreed that perhaps another formula utilizing two standard deviation points may accurately portray EWA fleet performance. The various methods of attempting to adjust program alert levels thus far, coupled with the an absence of dedicated program analysts, appears reactive rather than proactive in the scope of Reliability Program application.

In closing, please be advised that, as a consequence of the Unapproved changes to the Reliability Program and the absence of accurate data as discussed in the meeting, the EWA Reliability Program is in jeopardy of Operations Specifications amendment in accord with the provisions of FAR 119.51. It is suggested that individuals concerned with the Reliability Program aspect understand Federal Aviation Regulations Parts 119 and 121 of CFR 14, plus related FAA guidance as contained in the Aviation Safety Inspectors Handbook Order 8300.10.

Sincerely,

**ORIGINAL SIGNED BY**



Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene P. Visscher - EWA  
Thomas M. Wood - EWA  
File: 8300-4.01  
WP: C:\My Documents\EWA MRP Rev .doc

M7:J.A. Abramski:JAA:(408) 291-7681 ■■■ 8/10/98

September 24, 1998

Mr. Thomas M. Wood  
Director, Quality Control  
Emery Worldwide Airlines  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Wood:

This correspondence is in reply to your letter dated September 18, 1998, wherein you have stated several contrary assertions to actual events which transpired during our visit to the Emery Worldwide Airlines (EWA) facility located in Vandalia, Ohio, during the week of September 14, 1998.

- 1) I advised you on Tuesday morning, September 15, 1998, in the company of Aviation Safety Inspectors Larry Moheit, Roger Sigg, Brian Schooley, and Terry McMasters, that the purpose of the our visit was to inspect EWA aircraft records and to address certain open issues. One of those issues concerned the main cargo deck Supplemental Type Certificate installation; its Class "E" liner; floor ballmat and roller installation; cargo door; etc. I further stated that this was an open issue since it concerned a previous aircraft ramp inspection and your follow up letter to that inspection, wherein you stated that you would make additional information available for our examination (see attachment). In addition, I also stated that Inspector Schooley had several questions regarding this matter that he discovered on previous occasions. While I did not elaborate his concerns at that moment, if you will recall, he expressed his concerns during an informal meeting which occurred at the conclusion of your DC-10 fleet aircraft addition presentation at this office location on July 21, 1998. Present at that meeting was yourself, Mr. Rene Visscher, Vice President of EWA Technical Services; Inspectors Roger Sigg, Larry Moheit, James McNulty, Brian Schooley, and myself. Although I did state in passing during our brief conversation, that prior to a certificate transfer all open issues must be addressed, I did not refer to the purpose of our visit as being a means toward that end.
- 2) Regarding the matter of your statement concerning an advisement and subsequent debrief by myself to you on any problems found during our inspection; my statement to you on Wednesday, September 16, 1998, in the accompaniment of Inspectors Larry Moheit and Roger Sigg, was in response to your request for a debrief on discovered issues. I replied that we would attempt to comply with your request if time remained at



the conclusion of our inspection. Apparently you understood this reply because later in the day when you provided us with copies of several documents that you previously denied to us, you requested a discussion of those documents if we had the time.

As you are aware, when you departed your workplace at the conclusion of your workday on Thursday, September 17, 1998, you observed that we continued to inspect the available aircraft documents, thereby prohibiting a debrief.

In closing, please be advised that in the forthcoming days and in conformity with past practice, I will provide you with a recap of our visit.

Sincerely,

**ORIGINAL SIGNED BY**



Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene Visscher - EWA  
Kent Scott - EWA  
L. Moheit - FAA  
R. Sigg - FAA  
B. Schooley - FAA  
T. McMaster - FAA  
J. P. Howard - FAA  
J. R. Howard - FAA  
File: 8320-1.12  
WP: C:\My Documents\woodwrath.doc

M7:J.A. Abramski:JAA:(408) 291-7681 [REDACTED] 10/5/98



# **Fax Cover Sheet**

**FEDERAL AVIATION ADMINISTRATION**  
Flight Standards District Office  
1250 Aviation Avenue  
Suite 295  
San Jose, California 95110-1130

---

**To: Bob Peck / Jim Feisley - EWA**

**Phone:** [REDACTED]  
**Fax: (937) 898-2803**

**From: Joseph A. Abramski**  
Principal Maintenance Inspector

**Phone: (408) 291-7681** [REDACTED]  
**Fax: 408-279-5448**

**Date: November 4, 1998**

**Total Pages**  
**(with cover): 2**

---

**Comments - Bob Peck / Jim Feisley:**

This will confirm our telecon this day regarding the EWA DC-10 aircraft MSG3 maintenance program submitted to this office for our review. Present at this discussion were Inspectors Roger Sigg, Larry Moheit, and myself of this office; and you gentlemen.

Our discussion concerned the irregularities, inconsistencies, and incomplete EWA work cards and references thus far discovered by us in our review merely of the A1 and C1 inspection documents. As I stated to you in this telecon, in our opinion these program documents should not have been sent to this office for our review based upon their present order and format. We have expended an inordinate amount of time on a fragmented maintenance program that, as you are aware, was twelve (12) weeks late in arriving at this office for our review, according to the original schedule of events.

It is our understanding that EWA will finalize at the end of this workweek, a complete and comprehensive MSG3 inspection program to be forwarded to this office for our review. Please insure that these documents are indeed

9

pristine, as otherwise, undesirable delayed approval may be encountered which would be counterproductive to our mutual efforts.

Should you require additional time to verify the contents of the program for completeness prior to submission, please advise us accordingly.

Regards,

Joe Abramski

ORIGINAL SIGNED BY



CC: Rene Visscher

*ORIGINAL SENT BY ~~Joe Abramski~~  
ON NOVEMBER 4, 1998!*

November 13, 1998

Mr. Thomas M. Wood  
Director, Quality Control  
Emery Worldwide Airlines, Inc.  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Wood:

This letter is to inform you that the Emery Worldwide Airlines (EWA) proposed DC-10 maintenance program as submitted to this office for our review and approval does not meet the criteria for a New Operator as specified in the MSG-3 Maintenance Review Board Report (MRB) and the Boeing DC-10 Maintenance Check Manual Volume I documents (attached). Therefore, the EWA DC-10 maintenance program, as submitted, is unacceptable.

At issue is the proposed EWA "C" Check maintenance interval of twenty four months which exceeds the New Operator program initial "C" Check interval specified at 4000 Flight Hours or 15 months, whichever comes first, in the aforementioned documents. Thereafter, operators who accomplish this initial "C" Check interval, and providing the inspection findings are acceptable to the assigned FAA Principal Inspectors, may escalate the "C" Check interval to 5200 Flight Hours or 15 months, whichever comes first.

New Operators, as referenced in the aforementioned MSG-3 MRB and Boeing documents, are defined as operators that have never operated a particular type of aircraft. This definition was clarified in a telecon on November 10, 1998, with Mr. William Rau, FAA Chairman, DC-10 MSG-3 MRB, Aircraft Evaluation Group (AEG), Los Angeles; and on November 12, 1998, Mr. Frederick W. Sobeck, Aircraft Maintenance Division (AFS 330), Washington, D.C. It should be noted that, according to Mr. Rau, no other new operators of the DC-10 MSG-3 program have received any deviation to its maintenance program provisions.

Therefore, please adjust the maintenance intervals accordingly, and resubmit for our review and approval.

Sincerely,

ORIGINAL SIGNED BY



Joseph A. Abramski  
Principal Maintenance Inspector

Enclosure

cc: Kent Scott - EWA  
Rene Visscher - EWA  
William Rau - FAA  
Frederick W. Sobeck - FAA  
Jay P. Howard - FAA  
File: 8300-1.02  
WP: \Document2

M7:J.A. Abramski:JAA:(408) 291-7681 [REDACTED] 11/13/98

November 30, 1998

Mr. Charles R. Peck  
Manager, Reliability Dept.  
Emery Worldwide Airlines, Inc.  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Peck:

This correspondence will confirm our telecon on this day regarding the following subject matter:

- 1) The proposed DC-10 Time Limits Manual provisions require revision to include only DC-10-10 series aircraft. The references to DC-10-15 and DC-10-30 series aircraft is to be deleted. Please note that references to the -15 and -30 series aircraft in any other Emery Worldwide Airlines documents will also require deletion.
- 2) A copy of the FAA Order 8300.12, Corrosion Prevention And Control Programs, that you requested was mailed to you this day.
- 3) It is my understanding that your department is reviewing the proposed EWA DC-10 Maintenance Inspection Program work cards for completeness and conformity to the issues that were previously identified by this office as deficient. Please forward the corrected documents for our review.

Please inform us if we can be of further assistance.

Sincerely,

**ORIGINAL SIGNED BY**



Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene Visscher - EWA  
Thomas M. Wood - EWA  
File: 8310  
WP: \DC10 Insp Program

M7:J.A. Abramski:JAA:(408) 291-7681 [REDACTED] 12/2/98

December 9, 1998

Mr. Thomas M. Wood  
Director, Quality Control  
Emery Worldwide Airlines, Inc.  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Wood:

An inspection of Emery Worldwide Airlines (EWA) maintenance personnel training records was conducted by Geographic Aviation Safety Inspector James B. McNulty at the EWA Maintenance Training facility on November 4, 1998, through November 9, 1998. The purpose of this inspection was to ascertain acquired DC-10 aircraft maintenance training and experience to that of the maintenance experience qualifications as stated in the EWA Memorandum authored by Bruce A. Robbins, Manager, EWA Maintenance Training, dated August 6, 1998 (attached). Please note that substantiating documentation did not accompany the attached memorandum supporting the EWA DC-10 aircraft maintenance experience contention. The results of this inspection, including our comments and requests are contained herein.

The following EWA maintenance personnel training records were absent DC10 aircraft maintenance training certificates and experience level justification:

<u>NAME</u>	<u>STATION</u>	<u>NAME</u>	
Adams, Chris R.	SEA	Biley, James L.	RNO
Calis, Aoelbertus J.	TUS	Cimprich, Joseph P.	DAY
Clay, Ronald L.	PHX	Coby, Herve	JFK
Degroat, Ronald D.	DAY	Dukes, Albert S.	CLT
Gongora, Michael R.	PHX	Holder, Daryl K.	OAK
Jackson, William R.	GRR	Lasky, Thomas O.	DAY
Lawrence, James L.	DAY	Mraz, Stephen A.	LAX
Quesnay, Cesar V.	SJU	Ricardo, Herman G.	YYZ
Ryba, Thomas G.	DAY	Snyder, Frederick A.	LAX
Thomas, Christian G.	FLL	Thorsteinsson, Halldor	BWI
Toral, Felipe A.	MEX	White, Robert D.	PHL
Wilce, Henry J.	FLL	Young, Michael S.	IAH

The following EWA maintenance personnel training records reflected acquired DC-10 aircraft maintenance certificates of training, but absent experience level justification:

<u>NAME</u>	<u>STATION</u>	<u>FAA COMMENTS:</u>
Atchley, Rex E.	DFW	DC-10 training at Elsinore Airframe Services 46 hours, 9/14/90. Requires Recurrent Training.
Blalock, Hugh M.	BRU	DC-10 training at European Aviation Training Center, 4/26/93 thru 5/7/93, training hours not indicated. Requires Recurrent Training.
Dewulf, Jan	BRU	Same DC-10 training and requirement as Blalock.
Foy, John E.	CLT	DC-10 one day training session at Continental Airlines, 3/18/88. Requires Initial Training.
Gomez, Jaime	DAY	DC-10 training at National Airlines, 11/11/71, 32 hours. Requires Initial Retraining.
Granados, Cruz	MEX	DC-10 training at Emery Training Center Aeromexico 2/17/83 thru 3/25/83; & also at American Airlines completed on 1/11/91, no course hours noted. Requires recurrent training.
Hahn, Gerald J.	OAK	DC-10 Systems training at World Airways, 120 hours 12/23/77. Requires Initial Retraining.
Heisler, Joseph	YYZ	Canadian mechanic with <u>expired authorization</u> from the Canadian Aviation Ministry to perform aircraft maintenance on DC-8 & DC-10 aircraft. Canadian authorization expired on June 1, 1993, according to EWA maintenance records.
Iacullo, Pasquale	JFK	DC-10 training Trans America Airlines, 40 hours, undated. Requires Initial Retraining.
Lerouge, Christiaan	BRU	DC-10 Familiarization training course, European Aviation Training Center (EATC), 4/4/93 thru 5/5/93. Recurrent training required.
Loaiza, Jose M.	DAY	DC-10 Airframe & Powerplant training, 80 hours, Continental Airlines, 7/30/93. Recurrent training required.



Moody, Ronald E.	DAY	DC-10 training, 8 hours, Zantop Airlines, 12/8/94. Requires Initial Training.
Simmons, Russell	OAK	DC-10 training, 96 hours, World Airways, 5/18/82. Requires Initial Retraining.
Suchanski, Victor W.	EWR	DC-10 training, 40 hours, Trans America Airlines, with no date or certificate on file. Requires Initial Training.

The following named EWA maintenance training record did not have any DC-10 maintenance training certificate on file but merely a resume:

Fly, William H.	MHR	Requires Initial DC-10 Training.
-----------------	-----	----------------------------------

The following named on-call maintenance DYN AIR employees training records are discrepant:

Miller, Thomas G.	PHX	DC-10 Certificate of Training absent as proof of annotated 80 hour DC-10 DYN AIR maintenance training. Requires Initial Training.
Bowen, Earnest E.	PHX	DC-10 Certificate of Training and experience justification absent from file.

As a result of this inspection, please provide the following information:

- 1) An explanation of how EWA determined the qualifications for DC-10 experience.
- 2) A roster of all EWA maintenance personnel trained to date on the DC-10 aircraft. Include the employee's name, payroll number, FAA Certificate number, dates of training, number of hours received, agency trained by, and place of training. Further, if these employees were recently trained by an agency other than Airline Maintenance Training Inc., please include a copy of the course curriculum for our review.
- 3) A roster of all EWA Contract Maintenance personnel that are trained and qualified on the DC-10 aircraft. Please provide the necessary applicable information contained in paragraph two (2) above.

Please provide this information within ten (10) working days after receipt of this letter. Should you require clarification on this matter, please call at your convenience.

Sincerely,

**ORIGINAL SIGNED BY**



Joseph A. Abramski  
Principal Maintenance Inspector

cc: Kent Scott - EWA

Rene Visscher - EWA

James B. McNulty - FAA

File: 8310-7.00

WP: C:\My Documents\EWA DC10 Maintenance Training.doc

M7:J.A. Abramski:JAA:(408) 291-7681 [REDACTED] 2/9/98

17

December 15, 1998

File Number: 99WP150023

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Scott:

On December 14, 1998, inspectors in this Certificate Holding District Office (CHDO) for Emery Worldwide Airlines, Inc. (EWA), were informed through internal FAA communications, that an EWA DC-8-73 series aircraft, N105WP, located in Los Angeles, California, had incurred structural failure to the main cargo door. An inspection of that aircraft on this same day by an inspector from this office, revealed that aircraft N105WP had indeed incurred structural failure to the main cargo door, and that repairs were in progress. It was further revealed that according to the aircraft log, the structural failure occurred on November 27, 1998.

This letter is to inform you that Emery Worldwide Airlines, Inc., the holder of Air Carrier Certificate Number REXA558B, may be in violation of Federal Aviation Regulations, and that this matter is under investigation by the Federal Aviation Administration. We offer you the opportunity to submit a written statement to this office regarding this matter, which should be accomplished within ten (10) working days following receipt of this letter. Your response should contain all pertinent facts and extenuating or mitigating circumstances that you believe may have a bearing on this matter. Should you elect not to respond within the specified time, our report will be processed without the benefit of your statement.

CONCURRENCES	
ROUTING SYMBOL	M7
INITIALS/SIG	
DATE	
ROUTING SYMBOL	M2
INITIALS/SIG	<i>[Signature]</i>
DATE	12/17/98
ROUTING SYMBOL	M6
INITIALS/SIG	<i>[Signature]</i>
DATE	12-17-98
ROUTING SYMBOL	E3
INITIALS/SIG	<i>[Signature]</i>
DATE	12/17/98
ROUTING SYMBOL	O2
INITIALS/SIG	<i>[Signature]</i>
DATE	12/18/98
ROUTING SYMBOL	AMA
INITIALS/SIG	<i>[Signature]</i>
DATE	12/17/98
ROUTING SYMBOL	MGR
INITIALS/SIG	<i>[Signature]</i>
DATE	12/16/98
ROUTING SYMBOL	Mail
INITIALS/SIG	<i>[Signature]</i>
DATE	12/16/98

Sincerely,

**ORIGINAL SIGNED BY**

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene P. Visscher - EWA  
Thomas M. Wood - EWA  
File: 8030-1.00  
WP: A:\LOI N105WP.doc

M7:J.A. Abramski:JAA:(408) 291-7681 ■■■■■ 10/8/98

19

December 15, 1998

Mr. Thomas M. Wood  
Director, Quality Control  
Emery Worldwide Airlines, Inc.  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Wood:

**Request For Information**

On November 27, 1998, at Los Angeles, California, a structural failure within the main cargo door was discovered by Emery Worldwide Airlines (EWA) maintenance personnel on an EWA DC-8-73 series aircraft, N105WP.

Accordingly, the following information is hereby requested :

- 1) The total aircraft time in service since the STC'd main cargo door installation.
- 2) A copy of the aircraft log book pages 6913-12; 6913-13; 6913-17; 6913-22; 6913-24; 6913-25; 6913-26; 6913-27.
- 3) Copies of all Non Routine Maintenance Work Forms associated with the repair to the main cargo door and any other maintenance performed during the aircraft out of service time in Los Angeles.
- 4) A copy of the last maintenance "A" Check work forms and all Non Routine Work Forms associated with that check.
- 5) A copy of FCD 52-6.
- 6) An aircraft listing of FCD 52-6 accomplishment and findings for each aircraft.
- 7) A copy of AI-5233-04:07.
- 8) An aircraft listing of AI-5233-04:07 accomplishment and findings for each aircraft.
- 9) A copy of the previous log book pages that state cabin pressurization problems; aircraft hull or main cargo door leaks; main cargo door malfunctions; or main cargo door indication malfunctions.

Please provide the requested information to the undersigned within ten (10) working days after receipt of this letter. Should you have any questions or require clarification regarding this matter, please call at your convenience.

Sincerely,

ORIGINAL SIGNED BY 

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Kent Scott - EWA  
Rene Visscher - EWA  
Michael O'Neil - FAA  
File: 8030-1.00  
WP: C:\My Documents\Request for Info N105WP.doc

M7:J.A. Abramski:JAA:(408) 291-7681 [REDACTED] 12/16/98

February 10, 1999

Mr. Thomas M. Wood  
Director, Quality Control  
Emery Worldwide Airlines, Inc.  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Wood:

This office has received a request for assistance from the FAA Los Angeles Aircraft Certification Office (LAX ACO) in retrieving, for FAA structural analysis, the fractured main cargo door frames on Emery Worldwide Airlines (EWA) DC-8 aircraft N105WP. As you are aware, the failure of these door frames was discovered on November 27, 1998, by EWA maintenance personnel in Los Angeles, California, and is the subject of an open investigation by the FAA into this matter.

Since it is our understanding that FAA LAX ACO engineering personnel have politely requested these door frames for analysis on a number of occasions without success, we would appreciate your cooperation in this matter.

Please forward the requested parts to: Mr. Michael E. O'Neil or Greg DiLibero  
Aerospace Engineer  
FAA Los Angeles Certification Office  
3960 Paramount Blvd.  
Lakewood, CA. 90712-4137

Sincerely,

ORIGINAL SIGNED BY 

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene Visscher - EWA  
Michael E O'Neil - FAA  
Greg DiLibero - FAA  
File: 8030-1.00  
WP: \N105WP Cargo Door Parts

(22)

0 0 0  
0 0 0  
0 0 0

M7:J.A. Abramski:JAA:(408) 291-7681 [REDACTED] 2/10/99



December 17, 1998

Mr. Thomas M. Wood  
Director, Quality Control  
Emery Worldwide Airlines, Inc.  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Wood:

Conjunctive to the Emery Worldwide Airlines (EWA) DC-10 certification, please inform this office in writing of the following information relative to the intended EWA DC-10 aircraft acquisition, N68042, which is presently in a maintenance and modification status at the Aeronovli Repair Facility:

- 1) The FAA approved maintenance program document utilized in the present course of maintenance activities (i.e. MSG-2; MSG-3; or other). Please cite the document number in your response.
- 2) The holder (Air Carrier, Air Agency, etc.) of the FAA approved continuous airworthiness maintenance program for the aircraft.

Please forward the requested information as soon as possible.

Sincerely,

ORIGINAL SIGNED BY 

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene Visscher - EWA  
File: 8310-0.00  
WP: C:\My Documents\N 68042 Maint Program.doc

M7:J.A. Abramski:JAA:(408) 291-7681 [REDACTED] 2/18/98

24

December 21, 1998

Mr. Thomas M. Wood  
Director, Quality Control  
Emery Worldwide Airlines, Inc.  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Wood:

This office has not received a copy of the Emery Worldwide Airlines (EWA) Inspection Procedures Manual, Volume II, Revision Number 22, that was approved by the undersigned on September 25, 1998. We understand from our direct inquiry of EWA's Technical Publications Department that a backlog exists due to the DC-10 aircraft certification priority.

Accordingly, please provide a status update as to when this revision is forthcoming.

Sincerely,

**ORIGINAL SIGNED BY**



Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene Visscher - EWA  
File: 8300-2.05  
WP: \Document2

M7:J.A. Abramski:JAA:(408) 291-7681 ■■■ 12/21/98

December 21, 1998

Mr. Thomas M. Wood  
Director, Quality Control  
Emery Worldwide Airlines, Inc.  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Wood:

This letter will confirm our telecon of this day regarding Emery Worldwide Airlines (EWA) compliance with Telegraphic Airworthiness Directive (TAD) T98-26-51 as applied to EWA's fleet of DC-8 aircraft.

It is understood that EWA will issue Maintenance Authorization AI-5234-04:00 which will address the specific inspection guidance as contained in paragraph (B) of the aforementioned TAD; and EWA plans completion of the inspection on or about December 25, 1998. In addition, EWA will inform this office and the Atlanta Aircraft Certification Office (ACO) of its inspection findings.

Thank you for your cooperation in this matter.

Sincerely,

ORIGINAL SIGNED BY 

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene Visscher - EWA  
File: 8320-1.01  
WP: \EWA TAD 98-26-51

M7:J.A. Abramski:JAA:(408) 291-7681 ■■■ 12/21/98

26

## *Record of Telephone Call*

**Name:** Thomas M. Wood  
**Address:** 303 Corporate Center Drive  
Vandalia, OH 45377  
**Phone:** [REDACTED]  
**Date:** 12/22/98, at 1:00 PM

**Subject:** EWA DC-10 Maintenance at Aeronovle, Italy

---

### *Synopsis of Telecons with Tom Wood and Rene Visscher 12/22/98:*

Telecon with Tom Wood, Director, EWA Quality Control originally concerned timetable for EWA resubmission of the DC-10 Inspection Program. EWA will have the "A" Check portion of the inspection program completed and forward to EWA Quality Control for audit by 12/24/98; then forwarded to this office by 12/31/98. The "C" Check portion will be completed and forwarded to EWA Quality Control by 12/28/98; then forwarded to this office by 1/4/99.

Mr Wood then addressed my letter dated December 17, 1998, requesting clarification on the type of maintenance program (MSG-2 or MSG-3) that the DC-10 (N68042) EWA intends to acquire, and add to its Op Specs is presently being maintained under; and the FAA approved continuous maintenance program holder of that program.

Mr. Wood stated that the aircraft is being maintained in a Check "C" status under the MSG-3 program guidelines. I stated to Mr. Wood that the MSG-3 program has not been approved by the FAA as yet, since the EWA proposed program had yet to be approved; and further that the EWA program will be the first to be approved under the MSG-3 process. His rebuttal was that EWA will take the MSG-3 program approved by this office and bridge the EWA program to the program being utilized presently at Aeronovle for direct inclusion. Mr. Wood clarified that the work cards presently being used at Aeronovle are the Boeing DC-10 work cards which are FAA accepted. I attempted to provide clarification to Mr. Wood that: (1) The FAA approved MSG-3 program is merely a planning document which is to be used in the formulation by a certificate holder in composing their continuous airworthiness maintenance program; (2) That the Boeing work cards are also maintenance planning documents which are also utilized by a certificate holder in composing their continuous airworthiness maintenance program; and that taken together, the certificate holder formulates its own continuous airworthiness maintenance program and submits it for FAA approval.

Mr. Wood continued to maintain that the MSG-3 program and the Boeing work cards were FAA approved and could be used during maintenance without an FAA approved continuous airworthiness maintenance program. I stated that this was contrary to any FAA guidance that we know exists.

Mr. Wood insisted that he was quite correct in his assumption and suggested that we (EWA & this office) attempt to resolve this issue without us inquiring of other FAA resources for guidance on this issue. I stated to Mr. Wood that we would inquire of all FAA resources for guidance and clarification on this matter.

At approximately 1:40 PST, I phoned Mr. Rene Visscher and apprised him of Mr. Wood's position. I further stated that we were under the impression that the subject aircraft was undergoing a "D" Check, which is relative to the MSG-2 maintenance program approved for Continental Airlines, from whom the aircraft had been previously maintained. Mr. Visscher was quite concerned about this controversy, and inquired what can be done to rectify the situation. We discussed the possibility of EWA performing a "D" Check under the Continental program; then bridging that accomplishment to the MSG-3 program which would be legitimate according to existing FAA guidance. We terminated the conversation on that note.

**ORIGINAL SIGNED BY**

  
**JOSEPH A. ABRAMSKI**  
Principal Maintenance Inspector



U.S. Department  
of Transportation  
Federal Aviation  
Administration

San Jose Flight Standards District Office

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

January 7, 1999

File Number: 99WP150025

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

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

Dear Mr. Scott:

This letter is to inform you that Emery Worldwide Airlines, Inc., the holder of Air Carrier Certificate Number RRXA558B, may be in violation of Federal Aviation Regulations, in that this office has not received the required Mechanical Interruption Summary Reports for the months of September, October, and November, 1998; and that this matter is under investigation by the Federal Aviation Administration.

We offer you the opportunity to submit a written statement to this office regarding this matter, which should be accomplished within ten (10) working days following receipt of this letter. Your response should contain all pertinent facts and extenuating or mitigating circumstances that you believe may have a bearing on this matter. Should you elect not to respond within the specified time, our report will be processed without the benefit of your statement.

Sincerely,

**ORIGINAL SIGNED BY** 

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene P. Visscher - EWA  
Thomas M. Wood - EWA

(29)



U.S. Department  
of Transportation  
Federal Aviation  
Administration

San Jose Flight Standards District Office

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

January 27, 1999

File Number: 99WP150028

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

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

Dear Mr. Scott:

This letter is to inform you that Emery Worldwide Airlines, Inc., (EWA), the holder of Air Carrier Certificate Number RRXA558B, may be in violation of Federal Aviation Regulations, in that EWA has not conducted the monthly Maintenance Reliability Program meeting and review of its continuous airworthiness maintenance program as required in its D74 Operations Specifications Document EWA-51990, for the months of September, October, and November, 1998; and that this matter is under investigation by the Federal Aviation Administration.

We offer you the opportunity to submit a written statement to this office regarding this matter, which should be accomplished within ten (10) working days following receipt of this letter. Your response should contain all pertinent facts and extenuating or mitigating circumstances that you believe may have a bearing on this matter. Should you elect not to respond within the specified time, our report will be processed without the benefit of your statement.

Sincerely,

ORIGINAL SIGNED BY 

Joseph A. Abramski  
Principal Maintenance Inspector



U.S. Department  
of Transportation  
Federal Aviation  
Administration

San Jose Flight Standards District Office

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

January 29, 1999

File Number: 99WP150029

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

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

Dear Mr. Scott:

This letter is to inform you that Emery Worldwide Airlines, Inc., (EWA), the holder of Air Carrier Certificate Number RRXA558B, may be in violation of Federal Aviation Regulations, in that EWA, on November 6, 1998, authorized the Short Term Escalation of five (5) DC-8 aircraft "C" Check inspections contrary to the limitations and procedures governing its D76 Operations Specifications; and that this matter is under investigation by the Federal Aviation Administration.

We offer you the opportunity to submit a written statement to this office regarding this matter, which should be accomplished within ten (10) working days following receipt of this letter. Your response should contain all pertinent facts and extenuating or mitigating circumstances that you believe may have a bearing on this matter. Should you elect not to respond within the specified time, our report will be processed without the benefit of your statement.

Sincerely,

**ORIGINAL SIGNED BY** 

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene P. Visscher - EWA  
Thomas M. Wood - EWA





U.S. Department  
of Transportation  
Federal Aviation  
Administration

San Jose Flight Standards District Office

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

February 2, 1999

Mr. Thomas M. Wood  
Director, Quality Control  
Emery Worldwide Airlines, Inc.  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Wood:

This letter is a follow-up of your response dated January 4, 1999, to our request of that same day, in which you provided a listing of Emery Worldwide Airlines (EWA) DC 8 fleet aircraft which had heavy maintenance (C&D) checks performed in the 1998 calendar year.

Of those twenty one (21) aircraft, this office has received only six (6) of the required inspection reports to date, which are:

N8177U	C-Check completed on 2/3/98	Received SJC FSDO on 9/9/98
N961R	C-Check completed on 2/25/98	Received SJC FSDO on 3/30/98
N796AL	C-Check completed on 4/21/98	Received SJC FSDO on 6/23/98
N796FT	C-Check completed on 5/1/98	Received SJC FSDO on 8/4/98
N2674U	C-Check completed on 2/19/98	Received SJC FSDO on 10/5/98
N990CF	C-Check completed on 7/2/98	Received SJC FSDO on 1/11/99

Therefore, please be advised that we are requesting Emery Worldwide Airlines to provide an explanation for the absence of the required report submissions. Please respond in writing to this office no later than ten (10) working days after receipt of this letter.

Sincerely,

ORIGINAL SIGNED BY 

Joseph A. Abramski  
Principal Maintenance Inspector

February 8, 1999

File Number: 99WP150032

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

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


Dear Mr. Scott:

This letter is to inform you that Emery Worldwide Airlines, Inc., (EWA), the holder of Air Carrier Certificate Number RRXA558B, may be in violation of Federal Aviation Regulations, in that EWA performed a major alteration of EWA DC-8 fleet aircraft N996CF, N998CF, and N964CF by the installation of STC SA5455NM; and that this matter is under investigation by the Federal Aviation Administration.

We offer you the opportunity to submit a written statement to this office regarding this matter, which should be accomplished within ten (10) working days following receipt of this letter. Your response should contain all pertinent facts and extenuating or mitigating circumstances that you believe may have a bearing on this matter. Should you elect not to respond within the specified time, our report will be processed without the benefit of your statement.

Sincerely,

**ORIGINAL SIGNED BY**

  
Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene P. Visscher - EWA  
Thomas M. Wood - EWA  
File: 8030-1.07

February 8, 1999

File Number: 99WP150028

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

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

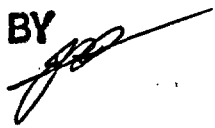
Dear Mr. Scott:

This letter is to inform you that Emery Worldwide Airlines, Inc., (EWA), the holder of Air Carrier Certificate Number RRXA558B, may be in violation of Federal Aviation Regulations, in that EWA has not conducted the monthly Maintenance Reliability Program meeting and review of its continuous airworthiness maintenance program as required in its D74 Operations Specifications Document EWA-51990, for the month of December, 1998, in addition to the months of September, October, and November, 1998, of which you were previously informed; and that this matter is under investigation by the Federal Aviation Administration.

We offer you the opportunity to submit a written statement to this office regarding this matter, which should be accomplished within ten (10) working days following receipt of this letter. Your response should contain all pertinent facts and extenuating or mitigating circumstances that you believe may have a bearing on this matter. Should you elect not to respond within the specified time, our report will be processed without the benefit of your statement.

Sincerely,

**ORIGINAL SIGNED BY**

  
Joseph A. Abramski  
Principal Maintenance Inspector

READING FILE COPY

34



U.S. Department  
of Transportation  
Federal Aviation  
Administration

San Jose Flight Standards District Office

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

April 22, 1999

**CERTIFIED-RETURN RECEIPT**

Mr. Bruce Robbins  
Director, Fleet Engineering  
Technical Services  
Emery Worldwide Airlines, Inc.  
7406 Webster Street  
Dayton, OH 45414

Dear Mr. Robbins:

This letter is to inform Emery Worldwide Airlines, Inc. (EWA), in accordance with the provisions of Federal Aviation Regulations (FAR) 121.373(b), that the Administrator has determined EWA's Continuing Analysis and Surveillance System and programs covering other maintenance, preventive maintenance, and alterations pertaining to the DC-8 fleet aircraft corrosion prevention and control maintenance program is deficient and requires immediate attention.

On March 24, 1999, FAA Aviation Safety Inspectors from the Western Pacific Region conducted a spot inspection of EWA DC-8 fleet aircraft records at the EWA Vandalia, Ohio, facility. Specifically, the seven aircraft records that were reviewed concerned the heavy maintenance checks as accomplished by the authorized EWA D-91 Operations Specifications substantial maintenance providers. Those seven aircraft records concerned EWA fleet aircraft: N870TV; N603AL; N795FT; N995CF; N801GP; N811AL; and N605AL.

As you are aware, it was noted by EWA at the time of the FAA inspection, that the Corrosion Prevention and Control (CPCP) maintenance task inspection findings were subsequently downgraded to reflect a lesser number of Level 2 corrosion inspection classifications for each of those aircraft. In addition, based upon our review of those records, it should also be noted that in our opinion, and as stated in the McDonnell Douglas Document Number MDC K4608, several CPCP inspection findings may have been classified as Level 3 corrosion findings had the manufacturer been summoned for a review and determination at the time of discovery.

2

Although we concede that EWA corrected many of the previously downgraded corrosion findings in those FAA inspected records, the current EWA DC-8 aircraft maintenance program illustrates a deficiency with regard to the time element between heavy maintenance checks that remains of a serious continuing airworthiness concern to this office.

Consequently, after all due consideration, we have determined that EWA's DC-8 aircraft maintenance program requires an immediate adjustment in order to comply with the provisions of Airworthiness Directive (AD) 92-22-07, paragraph (e). As stated in that paragraph, the operator must implement within 60 days a means approved by the FAA to reduce future findings of corrosion to Level 1 or better.

Since this matter was known to EWA on March 24, 1999, we shall expect to receive from EWA as soon as possible, a revised DC-8 aircraft maintenance program means of compliance for our review and approval, to be implemented by May 25, 1999.

Should you have any questions regarding this issue, please contact the undersigned at your convenience.

Sincerely,

**ORIGINAL SIGNED BY** 

Joseph A. Abramski  
Principal Maintenance Inspector

Enclosure  
AD 92-22-07

cc: Rene P. Visscher - EWA  
Thomas M. Wood - EWA  
Timothy J. Alman - EWA  
Maurice Nakagawa - FAA AWP-210

36



U.S. Department  
of Transportation  
Federal Aviation  
Administration

San Jose Flight Standards District Office

San Jose International Airport  
1250 Aviation Avenue, Suite 295  
San Jose, CA 951 10-1130  
Phone: (408) 291-7681  
FAX: (408) 279-5448

**CERTIFIED - RETURN RECEIPT**

June 14, 1999

Mr. Thomas M. Wood  
Director, Quality Control  
Emery Worldwide Airlines, Inc.  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Wood:

This letter will respond to your correspondence dated May 17, 1999, wherein Emery Worldwide Airlines, Inc. (EWA) proposed a change to its DC-8 aircraft fleet inspection program heavy maintenance check interval.

In reviewing the various aspects associated with the EWA current and proposed inspection program as stated in your May 17 letter, we accept your proposal of the two year calendar time interval for the "C" Check inspection interval, and hereby acknowledge and grant your request for the forty four (44) day "C" Check extension for aircraft N832AL. However, in the absence of any substantiating or justifiable maintenance inspection analysis of aircraft N951R, your proposal for the 285 flight hour extension is unacceptable. We note that this aircraft's last "D" Check inspection was performed on December 12, 1980; and that the initial Corrosion Prevention and Control Program (CPCP) maintenance tasks as required by Airworthiness Directive (AD) 92-22-07, have not been accomplished to date. Of the one hundred and sixty nine (169) corrosion task work cards contained within EWA's DC-8 Inspection Program, seventy two (72) of those task cards are contained in the "D" Check inspection. These 72 corrosion task cards are of the five (5) and six (6) year inspection interval as specified within Section 4 of the McDonnell Douglas DC-8 Corrosion Prevention and Control Program Document, MDC K4608, referenced in the aforementioned AD. Therefore, given the nineteen (19) years since the last "D" Check inspection, plus the absence of the initial corrosion task accomplishment, we question the structural integrity and subsequent airworthiness status of the aircraft.

Further, we reject the "D" Check inspection interval proposal of 25,000 flight hours for the following reasons:

- 1) In a recent discussion with the DC-8 Maintenance Review Board (MRB) Chairman, Inspector Robert Jackson of the Los Angeles Aircraft Evaluation Group (LAAEG), we were informed that the DC-8 Maintenance Steering Group (MSG) proposed MSG-3 maintenance program will not be approved until the latter part of this calendar year at the earliest. Therefore, EWA's proposed timetable for MSG-3 implementation of August, 1999, is rather remiss.
- 2) In reviewing available EWA DC-8 inspection reports and records, in addition to discussions with FAA Aircraft Certification Office (ACO) Aerospace Engineers Michael O'Neil and Greg DiLibero, plus Curt Curtis of Boeing subsidiary McDonnell Douglas, it is our assessment that the EWA CPCP inspection reporting data is inaccurate and does not depict a true portrayal of the programs effectiveness. This assertion is based on several reasons:
  - a) EWA's past method of classifying and reporting Level 2 corrosion findings was based upon only Designated Engineering Representative (DER) authorized repairs, and absent the airframe manufacturers Structural Repair Manual repairs; therefore reflecting an inaccurate CPCP level count. Please review paragraph c) following for details.
  - b) The EWA method of classifying the repeat interval of corrosion inspection findings, conducted after the initial inspection, for its DC-8 fleet is erroneous. In attempting to justify Level 1 corrosion program maintenance as mandated by AD 99-22-07, the present reporting by EWA of repeat inspection interval Level 2 corrosion findings is assessed across the fleet through the interpretation that a given repeat corrosion task finding of Level 2 corrosion must be found fleet wide on all EWA DC-8 aircraft in order for the repeat task to be classified as a Level 2. Only then is any adjustment required to the inspection program for Level 1 corrosion maintenance status. However, the intent of the AD and the MDC K4608 document is essentially that if corrosion exceeding Level 1 is found during accomplishment of repetitive inspections, then there is usually some need for change in an operators CPCP. A single occurrence of corrosion exceeding Level 1 does not necessarily warrant a change to the operators CPCP. It is the incumbent responsibility for the operator to monitor the results of corrosion task inspection findings for multiple occurrences of corrosion exceeding Level 1 as the operators CPCP progresses; evaluate and classify the findings; then submit the changes as warranted by the findings, to the FAA PMI for approval. The required time frame for submission is within 60 days.
  - c) An audit of the following recent EWA aircraft DC-8 Major Inspection Reports wherein corrosion level determinations are displayed, reveals a series of reporting discrepancies. These reports are in addition to the ten aircraft Major Inspection Reports that were previously misreported and which you have agreed to correct.

N796FT - Five Level 2 corrosion findings reported. Actual is eight.

N8076U - Only DER repairs reported. SRM repairs absent.

N8079U - Only DER repairs reported. SRM repairs absent.

N8177U - Only DER repairs reported. SRM repairs absent.

N950R - Only DER repairs reported. SRM repairs absent.

N961R - Only DER repairs reported. SRM repairs absent.

Seventeen SRM repairs not reported (see Aero Corp report dated 2/12/98).

Actual total corrosion findings reported should be 127 not 103.

- d) In reviewing the Major Inspection Reports, accompanying Operational Difficulty Reports, and conjunctive non routine inspection forms of EWA DC-8 aircraft N603AL, N801GP, N811AL, and N995CF, it would appear that Boeing's subsidiary McDonnell-Douglas should have been summoned to evaluate severe corrosion findings on those aircraft. Our concern is that strong evidence exists that Level 3 corrosion may have been classified were McDonnell-Douglas personnel consulted. In addition, we also note a considerable number reports citing cracks of structural members. This is symptomatic of structural fatigue and of which is an aging aircraft issue.
- e) Contrary to the statements as contained in EWA's FAA Approved Inspection Manual, Volume III, the absence of on-site EWA Quality Control Representatives at the Substantial Maintenance Providers facilities during the aircraft maintenance inspection process in order to physically assess inspection findings, reinforces our conviction that those findings may be misrepresented and/or misreported as in the CPCP or Supplemental Structural Inspection findings. As you are aware, EWA Quality Control Representatives or the Reliability Department Structural Analyst currently review the aircraft inspection reports and classify corrosion findings after the aircraft has departed the Substantial Maintenance Providers facility and the aircraft has returned to service. (Please reference the preceding paragraph as an example for our assertive concern).
- 3) A review of the EWA Aircraft utilization Reports reveals a low utilization rate for EWA's DC-8 fleet of aircraft. The low utilization rate factor, conjunctive to aircraft inspection intervals, was addressed in a joint FAA-Industry conference convened in Washington, D.C. on October 4, 1988. The conference topic was entitled "Low Utilization Aircraft Calendar Inspection Intervals Plan", and followed a series of recommendations. In comparing those recommendations and other considerations contained within the aforementioned plan to that of EWA's current "D" Check inspection interval and inspection findings such as those on N964R and N870TV, we conclude that EWA's inspection interval 25,000 flight hours is indeed excessive.

In conclusion and in the interest of safety, EWA must return to the Baseline CPCP and implement the 12 year calendar "D" Check, in conjunction with its 2 year "C" Check program. We will expect the appropriate changes to the DC-8 Inspection Program within 30 days following receipt of this letter.



Sincerely,

**ORIGINAL SIGNED BY**

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene Visscher - EWA  
Timothy Alman - EWA  
Rob Jackson - FAA LAAEG  
Michael O'Neil - FAA LAACO  
Greg DiLibero - LAACO



U.S. Department  
of Transportation  
Federal Aviation  
Administration

San Jose Flight Standards District Office

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

**CERTIFIED - RETURN RECEIPT**

June 16, 1999

Mr. Thomas M. Wood  
Director, Quality Control  
Emery Worldwide Airlines, Inc.  
303 Corporate Center Drive  
Vandalia, OH 45377

Dear Mr. Wood:

This letter will respond to your correspondence dated May 20, 1999, addressed to Mr. Jay Howard, Office Manager, San Jose Flight Standards District Office.

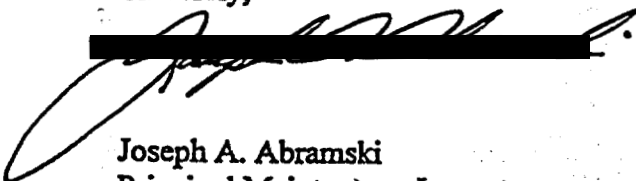
The issues below require either further information, comments from EWA, or require positive actions to be taken by EWA. Please respond to each item individually and provide with your response, the complete and precise information and/or documentation required by each item. Responses received without the required information or documentation will be considered as a "no response".

- 1) Items "A" and "B" of your letter regarding Emery Worldwide Airlines (EWA) DC-8 C and D Maintenance Check Inspection Program have been addressed by this office in a letter to you dated June 14, 1999.
- 2) Item "C" of your letter regarding the development of the Engineering Department has not been fulfilled to date. It is our understanding that the Structural Engineer and Systems Engineer positions have not been hired due to an EWA hiring freeze. We also note the promotion of a Reliability Analyst to the Acting Manager of Technical Publications vacates the Reliability Analyst's position. Therefore, does EWA plan on filling this position as well as the Engineering positions, and when? We invite your comment on this matter.
- 3) Item "D" of your letter has not been received for our review to date.
- 4) Item "E" of your letter regarding the addition of the Director of Engineering to the Reliability Program Maintenance Review Board (MRB) received approval by this office to the Reliability Program as Revision 7b on June 3, 1999.
- 5) Item "F" of your letter regarding increased data to be sent to the principals has not been fulfilled as of this date.

- 6) Item "G" of your letter regarding the upgrade of the Reliability Program has not been submitted to this office as of this date. Your letter embellishes on this item to state that the Director of Engineering has instituted increased data analysis in several areas which you therein proceed to cite specifics. Since the EWA Reliability Program is an FAA Approved Program conjunctive to EWA's D74 Operations Specifications, we take issue with instituting any change to the Reliability Program without our approval. This matter was clarified in a telecon this day with Bruce Robbins as not being implemented, but merely in the exploration and formulation stages.
- In addition, you assert that we are aware of the upgrade to the EWA MERIT computerized database collection system. This is an inaccurate statement since we have not received any information regarding this system and modifications thereto since December, 1997; nor have we received any revisions/additions to the MERIT Master Guides Volumes I & II since we received the originals on March 6, 1997. These Master Guides merely contain information relative to materials, purchasing, and parts handling / tracking. Absent are the areas described on page 2, Volume I of the Master Guide, concerning Aircraft Records, Aircraft Line Maintenance, Maintenance Control, Reliability, Quality Control, Production Control/Planning, and Heavy Maintenance (Vendors). As the MERIT system has evolved, we have not been kept apprised of the progress and the significance of the various applications. In essence, this office does not have sufficient information from which to assess the capability of the EWA MERIT system, nor accept such in accord with the provisions of FAR Part 121.369 c).
- 7) Regarding item "H" of your letter, we desire to be informed when the DC-8 Computer Based Training (CBT) program issuance to the various EWA Line Stations has been completed, and which Line Stations have received this program.
- 8) Regarding item "I" of your letter, we question the appropriateness of your assuming the interim duties and responsibilities of the Training Manager given the magnitude of your other varied duties and responsibilities as the Director of Quality Control. It would appear to this office that certainly a qualified individual exists within the Training Department that could assume the interim Training Department managerial duties. Furthermore, as we have commented in paragraph 2) above to the Engineering positions, is the filling of the vacant Training Manager position also due to a hiring freeze and when does EWA anticipate filling this position? We invite your comment on this issue.
- 9) In addressing item "J" of your letter, please refer to paragraph 6 above.
- 10) In reviewing item "K" of your letter, we note that you have not provided to this office a copy of the CPCP audit analysis detailing the method, process, and results for our review. Accordingly, we reference our letter to you dated June 14, 1999, regarding this matter.

In closing, we will expect your full response to the items noted above, within 30 days from your receipt of this letter.

Sincerely,

A handwritten signature in black ink, which is partially obscured by a thick black horizontal redaction bar.

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Kent Scott - EWA  
Rene P. Visscher - EWA  
Bruce Robbins - EWA



U.S. Department  
of Transportation  
Federal Aviation  
Administration

San Jose Flight Standards District Office

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

August 9, 1999

Mr. Thomas M. Wood  
Director, Quality Control  
Emery Worldwide Airlines, Inc.  
One Emery Plaza  
Dayton International Airport  
Vandalia, OH 45377

Dear Mr. Wood:

This letter is to inform you that our review of the proposed Emery Worldwide Airlines, Inc., (EWA), DC-8 aircraft "D" Check maintenance inspection interval adjustment, as received in this office on August 2, 1999, reveals an inappropriate application of the proration allowance as defined in FAA Advisory Circular 121-1A, Chapter 2, which I have attached.

As you will note in the first paragraph of Chapter 2, and throughout the document, proration of a maintenance program application is allowed for aircraft received from a previous operator. It does not apply to an operators existing aircraft fleet wherein the operator changes its maintenance inspection program time intervals. EWA's proposal is therefore, unacceptable at this time.

We suggest that EWA incorporate a transition plan for the "D" Check in conformity with the method as applied to the "C" Check inspection interval adjustment recently approved by this office.

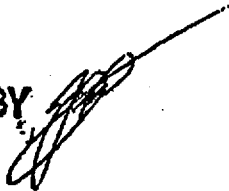
In essence, please resubmit a transition plan to this office within ten (10) working days after receipt of this letter.

Should you have any questions or require clarification on this matter, please contact me at your convenience.

Sincerely,

44

**ORIGINAL SIGNED BY**



**Joseph A. Abramski**  
**Principal Maintenance Inspector**

**Enclosure**

**cc: Rene Visscher - EWA**  
**Timothy Alman - EWA**  
**Bruce Robbins - EWA**



U.S. Department  
of Transportation  
Federal Aviation  
Administration

San Jose Flight Standards District Office

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

September 16, 1999

Mr. Jim Feisley  
Manager, Technical Publications  
& Maintenance Programs  
Emery Worldwide Airlines, Inc.  
One Emery Plaza  
Dayton International Airport  
Vandalia, OH 45377

Dear Mr. Feisley:

The Emery Worldwide Airlines, Inc. (EWA), Inspection Procedures Manual, Volume III, Revision 21 as submitted, has been disapproved for the following reasons:

Chapter 2

- 1) Page 5a, Corrosion Level Determination, missing from Chapter 2 Table of Contents Page i.
- 2) Page 2, Paragraph 6, incorrectly references MDC K-4608, Revision 1, dated December, 1990. The current revision of the document is Revision 3, dated February, 1995.
- 3) Page 2, Paragraph 8 is inappropriate in this manual. It would however, be appropriate for inclusion to the EWA Reliability Program Manual. Please delete this paragraph.
- 4) Page 2, Paragraph 10 is incomplete. Corrosion Level 2 and 3 findings are reportable to the FAA via Operational Difficulty Reports as required by FAR 121.703 (a) (15). Please amend and include as appropriate.
- 5) Page 3, Paragraph 2, second sentence, second half, which states " however, they do not have to be exactly as listed if corrosion is controlled to Level 1 or better", is objectionable and requires deletion for the following reasons: (a) EWA's DC-8 Maintenance Program is presently converting from Flight Hours to Calendar Times. Therefore, the CPCP inspection task intervals as defined in the MDC K-4608, Section 4, is applicable and appropriate. (b) A corrosion level determination has not been established for the EWA DC-10 aircraft fleet. The DC-10 maintenance and inspection intervals are also a Calendar Time based program. In addition, the DC-10 aircraft is not eligible at this time for inclusion to the EWA Reliability Program.
- 6) Page 5, Paragraph 5, seventh sentence, the word "evaluated" is inappropriate and inconsistent with paragraph 2, page 1-1-2, of the MDC K-4608 document; and

2

paragraph (e) of AD 92-22-07, which require "reduced" inspection intervals should corrosion task levels exceed Level 1. The "evaluated" factor should be ongoing as part of an Air Carrier's Maintenance Reliability Program in concert with the Continuing Analysis & Surveillance System. Therefore, since this paragraph paraphrases the previously cited MDC K-4608 document, replace the word "evaluated" with the word "reduced".

- 7) Page 5b, Note 1, is absent the word "compliance". This note paraphrases the MDC K-4608 document Note 1 located on page C-2-4. Please insert accordingly.
- 8) Page 5b, Note 3, fifth sentence, the word "expedition" should instead state the word "expeditious".
- 9) As we collectively discussed this day on a telecon in the presence of Bob Peck, Reliability Program Manager, Chapter 2 of the Inspection Program requires more definitive consistent references to the DC-10 CPCP methods and reporting, in conjunction with the DC-8 references contained therein.

In conclusion, please resubmit Chapter 2 of this revision for our review and approval. Should you have any questions regarding this matter, please call at your convenience.

Sincerely,

**ORIGINAL SIGNED BY** 

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene P. Visscher - EWA  
Bruce Robbins - EWA  
Thomas M. Wood - EWA  
C. Robert Peck - EWA

47





U.S. Department  
of Transportation  
Federal Aviation  
Administration

San Jose Flight Standards District Office

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

October 20, 1999

Mr. Bruce Robbins  
Director, Aircraft Engineering  
Emery Worldwide Airlines, Inc.  
One Emery Plaza  
Dayton International Airport  
Vandalia, OH 45377

Dear Mr. Robbins:

This correspondence will address your response to my letter of disapproval to the submitted Emery Worldwide Airlines, Inc. (EWA), Inspection Procedures Manual, Volume III, Revision 21. Again, the submission, has been disapproved for the following reasons as conjunctive to your letter's items:

Chapter 2

- 1) Item 1 - Page 5a, Corrosion Level Determination, missing from Chapter 2 Table of Contents Page i. Suggest you review Chapter 1 of the EWA Maintenance Policies and Procedures Manual regarding manual revisions. Style and format exclusions are not contained therein. This Inspection Program Manual is an FAA approved document which is not exclusively operator discretionary nor selective in content.
- 2) Item 3 - Page 2, Paragraph 8 does not accurately reflect Douglas Report MDC-K4608, Section 2, paragraph 13 instructions as alleged. The MDC-K4608 paragraph allows operators to convert calendar time to flight hours, landings, or cycles for ease of scheduling. Moreover, the cited MDC-K4608 paragraph and its associated section contents, does not contain any verbiage regarding the maintenance of Level 1 corrosion. I have included a copy of the MDC-K4608 document page as a part of this response for your review and edification.
- 3) Item 5 - Page 3, Paragraph 2. Your response elicits our curiosity regarding EWA's established CPCP program per the MDC-K4608 document, Section 3.2, which addresses an Alternate Means Of Compliance (AMOC) to AD 92-22-07. Neither this office nor the Los Angeles Aircraft Certification Office has an archived FAA approved AMOC for EWA on this issue. Therefore, we request that EWA provide a copy of the AMOC for our review.
- 4) Item 6 - Page 5, Paragraph 5. We believe your reasoning in this matter is erroneous, and therefore, unacceptable. As was stated in our previous letter dated September 16,

2

1999, EWA's Maintenance Reliability Program in concert with the Continuing Analysis & Surveillance System as required by FAR Part 121.373 is the evaluative tool. As you are aware, the effectiveness and objectivity of the EWA Reliability Program has been and remains, the expressed subject of concern to this office.

In conclusion, please resubmit Chapter 2 of this revision for our review and approval. Should you have any questions regarding this matter, please call at your convenience.

Sincerely,

ORIGINAL SIGNED BY 

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene P. Visscher - EWA  
Jim Feisley - EWA  
Thomas M. Wood - EWA  
C. Robert Peck - EWA

(49)



U.S. Department  
of Transportation  
Federal Aviation  
Administration

San Jose Flight Standards District Office

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

November 15, 1999

Mr. James Feisley  
Manager  
Maintenance Programs & Publications  
Emery Worldwide Airlines, Inc.  
One Emery Plaza  
Dayton International Airport  
Vandalia, OH 45377

Dear Mr. Feisley:

This office has reviewed the Emery Worldwide Airlines, Inc. (EWA) Inspection Program Manual Volume II, Revision 23 submission, and has disapproved such for the following reasons:

- 1) Chapter 1, page 1, paragraph I.B., second sentence: Change the verbiage "the inspector blocks can be", to "the Inspector blocks will be completed". This verbiage will then be consistent with Volume I, Chapter 1, page 1, paragraph I.C., and the note in Volume II, Chapter 1, page 2, paragraph B.c.
- 2) Chapter 1, page 5, paragraph 3.f.: Therein is stated in two places "the EWA Station Supervisor". What role does this individual contribute in the EWA "C & D" heavy maintenance check process? Where would we find his job description since it is not listed in the EWA Maintenance Policy & Procedures Manual?
- 3) Chapter 1, page 5, Paragraph D.5: Change the verbiage for the sake of clarity to read "The series of aircraft to which a work card is applicable".
- 4) Chapter 2, page 33, DC-8 C-Check work card PRE10, 1 of 5, items 1 and 5: In accordance with what conformity documents?
- 5) Chapter 2, page 34, DC-8 C-Check work card PRE10, 2 of 5, items 11 through 14: These system functional checks and tests are conducted in accord with what maintenance manual references?
- 6) Chapter 2, page 35, DC-8 C-Check work card PRE10, 3 of 5, items 16 through 20: These system functional and self tests are conducted in accord with what maintenance manual references? In addition, item 17 refers to which system (normal or standby; possibly both)?
- 7) Chapter 2, page 36, DC-8 C-Check work card PRE10, 4 of 5, items 21 through 29, functional checks/tests: The EWA DC-8 fleet has several different configurations of

avionics. Which procedures are applicable to which aircraft; and where (in what manual) are the FAA approved/accepted maintenance procedures located?

- 8) Chapter 2, page 37, DC-8 C-Check work card PRE10, 5 of 5, item c., MINIMUM ACCEPTABLE VOLTAGE: Are these stated voltages applicable to all makes and models of ULBB for both FDR and CVR?

Should you desire to discuss this matter, please contact either the undersigned or Principal Avionics Inspector Shawn Skaags at your convenience.

Sincerely,

ORIGINAL SIGNED BY 

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene Visscher - EWA  
Thomas M. Wood - EWA



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

San Jose Flight Standards District Office

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

November 27, 1999

Mr. James Feisley  
Manager, Maintenance  
Technical Publications  
Emery Worldwide Airlines, Inc.  
One Emery Plaza  
Dayton International Airport  
Vandalia, OH 45377

Dear Mr. Feisley:

A review of the Emery Worldwide Airlines, Inc. (EWA), Maintenance Policies and Procedures Manual Revision 21, dated August 16, 1999, and received in this office on August 30, 1999, is unacceptable for the following reasons:

Revision Highlights

- 1) Page 2: Cites Chapter 1, page 16 revision purpose (a) change which is not reflected in the revised page.
- 2) Page 5: Cites Chapter 4, page 168 purpose as adding DC-10-10 Short Term Escalation Limits. This appears to be a typographical error since the DC-10 aircraft is ineligible for such at this time; and such reference is not reflected on the submitted revision page,

Chapter 1 Revision Pages

- 1) Page 2, paragraph D, first paragraph: Cites three (3) volumes as the Inspection Program Manual content. Should be five (5) volumes.
- 2) Page 3, paragraph D continued: Volumes IV and V of the Inspection Program Manual content and aircraft type applicability absent.
- 3) Page 3, paragraph E: Subject paragraph statement cites DC-10-10 Aircraft Workcard System. However, the introductory paragraph cites DC-8 aircraft which is under development, and thus, presently unacceptable until completion. In addition, this database nomenclature needs to be identified; and EWA personnel accessibility to the Master Database (security issue) needs to be identified by job title.
- 4) Page 5, paragraph H: Requires the additional clarifying statement regarding aircraft maintenance inspection intervals.

- 5) Page 5, paragraph M subparagraph: Cites Technical Publications branch as controlled by Quality Control department. According to EWA maintenance organizational charts, the statement is in error and requires correction.
- 6) Page 7, paragraph C: Requires clarifying statement of interim and limited reference until EWA proprietary aircraft maintenance manual system is adopted as required by FAR 121.133; 121.135; 121.367; and 121.369.
- 7) Page 7, paragraph C.1.a.: Delete reference to DC-8-50 series aircraft.
- 8) Page 7a, paragraph C.1.b.: Delete reference to DC-8-50 series aircraft.
- 9) Page 7d, paragraph 1.: Absent is the CF6 Overhaul Manual as stated for EWA use on page 2, paragraph C.3. Please list accordingly.
- 10) Page 10, paragraph C.2.b.: This paragraph describes procedural changes to manuals and references line maintenance change procedures; however, heavy maintenance procedural change is absent and requires clarification.
- 11) Page 12, paragraph D.: Insert verbiage " Temporary revisions to manuals applicable only to manuals not requiring FAA approval ".
- 12) Page 16, paragraph IV.A.5.: Insert statement referencing " the EWA Maintenance Reliability Program Manual and any other manuals required for effective FAA certificate management duties ". Also include reference to the Principal Avionics Inspector.
- 13) Page 18, paragraph IV.B.c.: Revise subparagraph to delete reference to FAA stamp of acceptance/approval. Our acceptance/approval of EWA document revisions is accomplished via the EWA MEO59 form.

#### Chapter 2 Revision Pages

- 1) Pages 3, 4, and 8 EWA Organizational Charts in error according to organizational charts accompanying letter to FAA SJC FSDO Office Manager dated November 12, 1999. Those accompanying organizational charts (attached) require incorporation to the EWA MP&P.
- 2) Page 65, Maintenance Controller position description absent requirement for FAA Airframe & Powerplant Certificate, which is a requirement for stated maintenance responsibilities.
- 3) Page 103, paragraph AT.4.f.: Should not "improving safety" be the number one priority within the aircraft engineering discipline? In addition, absent is any reference to responsibility for the EWA Reliability Program and its incumbent relational responsibility.

#### Chapter 3 Revision Pages

- 1) Page 1, paragraph I.B.: FAR 43 reference deleted with this revision and not noted in revision highlights; however needs to be restated due to paragraph I.B.2. statement which is an excerpt from FAR 43.13.

- 2) Page 1, paragraph I.B.3.: This paragraph is inappropriate in its verbiage since it is an inaccurate paraphrase of FAR 65.81(a) and the Administrator does not desire to relinquish its discretionary responsibility in this matter; nor be a party to a distortion of the regulatory verbiage and incumbent requirements.
- 3) Page 2, paragraph B.5.a.: This paragraph is also inappropriate in its verbiage since it is an inaccurate paraphrase of FAR 65.83(a) and the Administrator does not desire to relinquish its discretionary responsibility in this matter.
- 4) Page 3, paragraph II.B.1.: What is meant in the first subparagraph by the verbiage "Depending on the Station"?
- 5) Page 3, paragraphs II.B.2. and 3.: Specify exacting sections of MP&P where the referenced procedures are stated.
- 6) Page 4, paragraph II.B.4.: Add to second sentence of subparagraph after "by an" the verbiage "FAA certificated and appropriately rated EWA authorized individual". Also add to third sentence of subparagraph after "who are" the verbiage "FAA certificated and appropriately rated and are authorized by EWA Quality Control department FAA certificated personnel, can issue in the aircraft log book, an aircraft Airworthiness Release".
- 7) Page 4, paragraph II.B.5.; Specify manual location of parts handling and procedures contained in the EWA MP&P.
- 8) Page 6, paragraph C.2.a.: Does Line Maintenance Scheduling perform this function? Please reference the attached organizational charts.
- 9) Page 6, paragraph B.1.a.: According to the attached organizational charts, there are two Maintenance Planning groups. Please specify in this paragraph the function of each work group.
- 10) Page 7, paragraph B.2.a.: As with the immediately previous stated item 9 above, this paragraph requires clarification.
- 11) Page 7, paragraph B.2.b.: This paragraph conflicts with the attached organizational charts.
- 12) Page 16, paragraph 8.: This item is unacceptable. Given the various electronic technology available within EWA and the industry, a written notice to the flight crew is not unreasonable.
- 13) Page 16, or page 17: Add a paragraph with the verbiage "Positive corrective maintenance action must be applied for a placarded MEL item to be considered closed. The aircraft must fly at least one flight without a repeat write-up to that system to which the MEL was applied".
- 14) Page 18, paragraph D.1.: Delete the verbiage "minor corrosion".
- 15) Page 19, paragraph 3.b.: This statement is in error and contrary to the Structural Repair Manual. If fuselage skin is part of the pressure vessel, then it is considered to be primary structure.
- 16) Page 19, paragraph 3.c.: This is a function of the EWA Engineering Department.
- 17) Page 19, paragraph 3.d.: Define "Modification items".
- 18) Page 20, paragraph E.5.: Replace the verbiage "as soon as possible" with the word "immediately".

- 19) Page 20, paragraph 5. NOTE: This procedure is unacceptable. This office does not understand why maintenance personnel cannot defer a maintenance item after the main cabin door is closed. In addition, EWA presently employs certificated Flight Engineers and Second Officers who are not FAA Certificated Airframe & Powerplant Mechanics.
- 20) Page 24, paragraph G.2.g.: Identify the referenced computer system.
- 21) Page 32, paragraph VII, ADJACENT TO subject entitled AIRCRAFT MAINTENANCE LOG: Add FAR 43.3 and 43.5
- 22) Page 50, paragraph D.2.: Add item d. statement "If the repair or alteration (minor or major) results in any change in the aircraft operating limitations".
- 23) Page 52, paragraph IX.A.5.: Add Engineering Department.
- 24) Page 52, paragraph IX.A.5. NOTE: Delete last sentence of this note. An Airworthiness Release is required and the Pilot In Command must be informed in accord with FAR Part 121.709 c).
- 25) Page 115, paragraph 3.b.: Delete DC-8, 50 series aircraft.
- 26) Page 177, paragraph XXXII.A.: Please explain reference to EWA1 Computer Information System application. Does this system remain functional? Previous correspondence to this office denies this systems functionality in lieu of the Merit system.

#### Chapter 4 Revision Pages

- 1) Page 1, paragraph B.3.: Revision bar absent for this paragraph.
- 2) Page 2, paragraph B.4.: Add a new paragraph stating the verbiage of FAR 65.83 in its entirety.
- 3) Page 64, paragraph IV.A.1.: Identify the electronic database utilized.
- 4) Page 112, paragraph beginning with reference to FAR 1: Add reference to FAR Part 43, Appendix A, as also being the defining factor in considering Major/Minor repairs. In addition, to the third subparagraph add reference to the DC-10 SRM.
- 5) Page 116, paragraph XI.A.\*6.: In reviewing the RII Operations mandates, this only applies only to the DC-10 No. 1/3 Wing Pylon, Nose, Fan & Core Cowls. What about fuselage, wing, empennage and other structural inspections as contained in the DC-10 maintenance manual? In addition, the DC-8 also warrants consideration in this matter.
- 6) Page 4, paragraph B.: Subject statement should specify DC-8 & DC-10 aircraft rather than All Fleet Aircraft.
- 7) Page 118, paragraph 4.(a): Component listing does not specify RII for these primary flight control components. Suggest reference to the definition statement contained on Page 116, paragraph XI.A., and reference to DC-8 and DC-10 maintenance manuals for inspection requirements.
- 8) Page 119, paragraph B.(7): This component listing for the landing gear also needs to be researched in the DC-8 and DC-10 maintenance manuals for RII requirements.



- 9) Page 119a, paragraph B.(8), (c) and (d): It would appear inconceivable that an engine driven fuel pump and an engine fuel control do not warrant RII after repair or alteration. Please address accordingly.
- 10) Page 119, paragraph B.(9), (e): Again, it would appear inconceivable that a "Servo Mechanism where primary cables are disturbed" does not require an RII consideration. Please research and address accordingly.
- 11) Page 120, paragraph C..NOTE: This note is contrary to paragraph C.1. and FAR Parts 121.369 (b) (7), and 121.371 (b). Please delete.
- 12) Page 121, paragraph E.3.b.: The first section of the paragraph stating the "EWA A&P Flight Engineer" is contrary not only to paragraph E.2.a. "normally assigned duties"; but also to FAR Parts 65.81 and 65.83. We do not consider this matter to be acceptable as a common practice. Additionally, in the sub paragraph, please state the criteria and by what process EWA determines an individual qualified to perform a one time RII function.
- 13) Page 122, paragraph G: The inspection stamp policy is inconsistent since not all EWA inspectors have stamps, and is therefore unacceptable.
- 14) Page 130, paragraph XIII.A.c.: What is the Engineering Departments role in the Maintenance Authorization (MA) major/minor alteration process? That department is not mentioned in this process; however the process is stated in each of their job descriptions. A restatement of the MA process is in order.
- 15) Page 154, paragraph B.6., subparagraph: Not only must the Captain of the One Engine Inoperative Ferry Flight be qualified and familiar with the operating procedures for one engine ferry flight etc., *all* flight crew members must have that same level of expertise. Reference FAR Part 91.611 (a) (6). Please restate in accord with the regulation.
- 16) Page 158, paragraph XIX.A., Policy: In the lead paragraph after the verbiage "granted authority, insert "through its Operations Specifications".
- 17) Page 158, paragraph XIX.A.3.: Add at the end of the sentence "However, a One Engine Inoperative Ferry Permit is required by FAR Part 91.611".
- 18) Page 173, paragraph XXII.A.: This paragraph requires revision to include the recently EWA Reliability Department adopted General Electric Engine Condition Monitoring System.
- 19) Page 180, C Check and D Check paragraphs: Require updating to reflect current heavy maintenance time limits.

#### Chapter 5 Page Revisions

- 1) Page 1, Paragraph I., adjacent to subject heading MAINTENANCE TRAINING PROGRAM: In addition to FAR 121.375, add FAR 65.81.
- 2) Page 1, paragraph B., subparagraph: We question whether the Director of Quality Control, who also serves as the Chief Inspector for EWA, can adequately address *all* of his various duties in concert with this responsibility.

- 3) Page 5, paragraph B.g.: How is this achieved? This office has not been apprised of any assessment that has emanated as a result of this process; nor have we been apprised of this process. The EWA Reliability Reports certainly do not reflect any activity in this regard.
- 4) Page 3, paragraph B.2.b.(2): Our aforementioned statement in item 3) is also applicable in this regard.
- 5) Page 3, paragraph C.1.: The lead paragraph describing the various formats that EWA considers to be formal training is unacceptable. The only *formal training* that the FAA recognizes is *classroom training*. All other forms of training are complimentary and supplemental. Please refer to the FAA Airworthiness Inspector Handbook, Order 8300.10, Volume 2, Chapter 70.
- 6) Page 3, paragraph C.3.: Reference is made to “non-structured” training which “is based upon aircraft condition”. Please explain, clarify, and state what is the meaning of that statement.
- 7) Page 4, paragraph D.1.: The subparagraph lists a series of topics a trainee receives at Indoctrination Training. Please explain the presence of the General Maintenance Manual Overview and its content.
- 8) Page 5, paragraph D.2. subparagraph: Add to “40 hours of aircraft systems training *in each type of aircraft operated by EWA*”. (i.e. DC-8, DC-10, etc.)
- 9) Page 5, paragraph D.3., subparagraph: Maintenance Service Letters (MSL’s) are not recognized as formal training (reference item 5 above). The MSL’s are information only, and do not afford the interrogative between student and instructor wherein clarification of a topic is required for comprehension. In addition, Maintenance Training Study Guides are not substitutes for formal training and we will not accept this form of training as familiarization training in lieu of classroom training.
- 10) Page 5, paragraph D.4. subparagraph: Addressess “Critical Tasks as stated in this section”. Where are these tasks stated?
- 11) Page 12, paragraph B., Systems: Add “For each EWA Aircraft Type”.
- 12) Page 14, paragraphs F. and G: Add same verbiage as stated in item 11.
- 13) Page 15, paragraphs H. and I.: Add same verbiage as stated in item 11.
- 14) Page 15a, paragraph J.: Add same verbiage as stated in item 11.
- 15) Page 18, paragraph D.2.: The EWA 1 computer system is stated therein as operational. However, this office has received correspondence to the contrary. Please explain this disparity.
- 16) Page 19, paragraph F.1.: This office *will not accept* Maintenance Study Guides for familiarization training credit within EWA’s maintenance training program.

#### Chapter 6 Page Revisions

- 1) Page 6, paragraph D. subparagraph, and D.3.a.: The word “Merit” appears without stating the “Merit” function. We presume the word refers to the EWA Merit electronic database; which incidentally, has not been accepted by this office in

accordance with the provisions of FAR Part 121.369 c) . In addition, please clarify which (or both) electronic database system is presently in use by EWA.

2) Pages 6, and 8: Revision bars are absent.

Should you have any questions regarding this matter, or if we can be of assistance, please contact this office at your convenience.

Sincerely,

ORIGINAL SIGNED BY 

Joseph A. Abramski  
Principal Maintenance Inspector

cc: Rene P. Visscher - EWA  
Thomas M. Wood - EWA  
Bruce Robbins - EWA

58