[redacted]
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Pursuant to 5 U.S.C. § 1213 (e), (1), below please find my comments regarding the DOT OIG REPORT #I21A001SINV (OSC File No DI-21-000392). Also attached please find a signed consent form to include my comments in the OSC's public file.

My name is [redacted]. For the last 24 years I have been an Aviation Safety Inspector with the Federal Aviation Administration (FAA). Prior to that I worked in the airline industry for over 20 years performing maintenance and inspections on aircraft operated by several major airlines.

On March 17, 2021, under the whistleblower program, I made two (2) whistleblower disclosures to the OSC which are described in this document as ***Disclosure # 1*** and ***Disclosure #2***.

DETAILS

Disclosure #1

On March 17, 2021, under the whistleblower program, I disclosed to the OSC my concerns regarding a violation to Federal regulations where Southwest Airlines (SWA) operated an aircraft (N710SW), in an unknown Airworthy condition with overdue inspections that were required (mandated) by Airworthiness Directive (AD) 2007-25-03. In addition, I reported that due to the abuse of authority, the violation of Federal Regulations was not addressed as required by FAA Management.

Regulatory Requirements:

Title 49 of the United States Code (USC), in Subtitle VII, Part A, Subpart III, Section 44701,
Under the authority of this section, the FAA issues Airworthiness Directives (AD) that contain compliance requirements to address unsafe conditions that could lead to a catastrophic event putting in jeopardy the lives of the flying public. ADs are Regulatory and legally enforceable.

14 CFR, Part 39.11 States: "Airworthiness directives specify inspections you must carry out, conditions and limitations you must comply with, and any actions you must take to resolve an unsafe condition".

14 CFR, Part 39.7 States: Anyone who operates a product that does not meet the requirements of an applicable airworthiness directive is in violation of this section.

14 CFR, Part 39.9 States: "If the requirements of an airworthiness directive have not been met, you violate 39.7 each time you operate the aircraft or use the product".

AD 2007-25-03 is directly related to safety and requires inspections of the Aft Pressure Bulkhead of certain aircraft in order to prevent a catastrophic event. Aircraft N710SW was one of the aircraft that was affected by the inspection requirements of the AD.

On May 9, 2019, via the Voluntary Disclosure Reporting Program (VDRP), SWA notified the SWA Certificate Management Office (CMO) of their noncompliance to AD (2007-25-03) Inspection requirements of the Aft Pressure Bulkhead for aircraft N710SW (safety related).

In order for the event to qualify and be accepted in the VDRP, one of the requirements is that the non-compliance must seize and be addressed at the time of discovery. In this case, records show that while SWA reported the AD noncompliance, SWA did not take immediate action to seize the non-compliance at the time of discovery (as it was required), and instead kept operating the affected aircraft (N710SW) in revenue service contrary to Federal regulations and Airworthiness requirements.

The then CMO Supervisor Principal Maintenance Inspector (identified in the OIG report as SPMI-1) due to SWA's knowingly operating the aircraft (N710SW) in revenue service with the overdue AD inspections, rejected the VDRP and opened an Enforcement (Investigation # 2019SW290003).

Contrary to the facts, which are supported by documented evidence and the above applicable regulations, the OIG report states that their investigation found insufficient

evidence to substantiate the whistleblower's disclosure or a violation of law, rule, or regulation.

In addition, the OIG report states that the FAA Supervisory Principal Maintenance Inspector (SPMI-1) told OIG that the VDRP was not accepted after determining that SWA had identified additional aircraft that may also not comply with the AD. For the record, that is not an accurate statement, while later there were additional aircraft affected by the AD, aircraft N710SW was the aircraft that SWA initially reported and the focus aircraft. After having serious concerns with the inconsistences of the OIG report, I reached out and talked to the SPMI-1, he categorically denies ever making the statement that the OIG is falsely stating in their report. It appears that the OIG investigator took the liberty of paraphrasing the facts. For the record, the reason for the VDRP not being accepted is stated in the Enforcement Letter of Investigation (# 2019SW290003) which states:

"Based on the requirements of FAA ORDER 8000.89 (CHG I, Dated October 1, 2016), and the VDRP Advisory Circular (AC) 00-58, the VDRP was not accepted on the basis that SWA failed to take immediate action and cease the non-compliance upon discovery".

The above Official referenced letter provides evidence which contradicts the OIG report. Also for the record, the same letter was provided to the OIG investigator during the investigation, but somehow questionably it was ignored as evidence.

Regarding the FAA attorney's position (referenced in the OIG report as Attorney-1) that this violation was not intentional, to which apparently the OIG investigator took for face value and did not consider the facts to further investigate, I offer the following data driven facts:

The SWA Director of Maintenance (DOM), Senior Director of Regulatory Affairs is a seasoned ex FAA Manager. He is fully aware of the Federal Regulations and the requirement that the AD noncompliance had to seize at the time of discovery. The SWA DOM was also advised by the then SWA CMO, SPMI-1 to take the aircraft out of service and informed him of the rejection of the VDRP on the grounds that SWA did not seize the noncompliance at the time of discovery. The facts show that SWA (once they became aware of the noncompliance), SWA knowingly kept operating the affected aircraft (N710SW) contrary to the AD inspection requirements and Federal regulations which makes it <u>intentional.</u>

The OIG report states that: "Because the evidence established that SWA grounded noncompliant aircraft immediately after discovery, Attorney-1 indicated that there was no information to suggest that SWA intentionally continued to operate an unairworthy aircraft, which may have warranted consideration for a civil penalty".

Other than OIG investigator taking the word of Attorney-1 (who some of the whistleblower allegations were against), there is no evidence that the OIG investigator reviewed the obvious evidence or challenged the baseless statements of Attorney-1, who had ignored the evidence of the intentional operation of aircraft N710SW. My whistleblower disclosure was very specific to aircraft N710SW which states in part :

"FAA Management was not following Guidance/National Policy/Federal Regulations and in my opinion were trying to sweep under the carpet a violation where SWA operated an aircraft (N710SW), in an unsafe condition, with overdue inspections that were required (mandated) by Airworthiness Directive (AD) 2007-25-03".

On May 9, 2019, when SWA became aware of their noncompliance to the AD requirements and made the conscious decision and knowingly kept operating this aircraft (N710SW) in an unknown Airworthy condition contrary to Federal regulations and Airworthiness requirements, that makes it an in intentional operation.

The OIG report states that: "In addressing the whistleblower and SPMI-1's allegations, Attorney-1 disagreed with the assertion that SWA should have grounded the remaining affected fleet of 306 aircraft upon discovery of one noncompliant aircraft".

For the record, the above statement "------ upon discovery of one noncompliant aircraft" substantiates the existence of an aircraft that was operating in a noncompliance with the AD requirements. That aircraft was N710SW, but Attorney-1 was able to mud the water by referencing other aircraft and was allowed by the OIG investigator not to identify the noncompliant aircraft which was a missed opportunity of the OIG investigator to substantiate my allegations. Regarding the statement that Attorney-1 made to the OIG about the whistleblower's and the SPMI-1 allegations that SWA should have grounded the remaining 306 aircraft, I challenge the OIG investigator (who had no problem reporting this inaccuracy without substantiation) to show the public where other than aircraft N710SW, this whistleblower made such a statement or assertion in my whistleblower disclosure or in that matter anywhere else. In addition, I also called the SPMI-1 after I read this OIG inaccuracy who confirmed that the only thing that took place was that the SPMI-1 informed the CMO Manager and SWA that if there were any additional aircraft affected by the non- compliance (to the AD inspection requirements) that he (SPMI-1) could not condone such operation. Instead of focusing on the aircraft that was specifically identified in my disclosure (N710SW), the OIG investigator allowed and accepted Attorney-1's mudding the water by referencing other aircraft which is obvious an attempt to discredit SPMI-1, the whistleblower and confuse the public.

Regarding Attorney-1's questioning the FAA's authority of grounding aircraft I would like to point out the following responsibility which is placed by U.S. Congress upon an FAA Inspector:

Under the provisions of Title 49 of the United States Code (49 U.S.C.) § 44713, which states:

"An inspector who becomes aware of an unsafe condition of an aircraft that is being operated or about to be operated and fails to act under the provisions of § 44713 is in dereliction of duty. This duty is placed specifically by Congress upon the inspector rather than on the Administrator. If the inspector, after due consideration, still has any doubts regarding whether or not to ground the aircraft, the grounding notice should be issued".

I am sure and I hope that Attorney-1 and the OIG investigator know that ADs affect safety and compliance is mandatory in order to avoid a catastrophic event.

> In mudding the water, among other statements, Attorney-1 leads one to believe that since an AMOC was ultimately granted (allowing SWA to continue to operate the additional aircraft that were affected (while inspections continued) suggests the absence of a serious safety concern and gives the notion "nothing happened where is the problem", it is very concerning to me.

Fact: The AMOC was issued on May 13, 2019 (4 days later), and it was not retroactive back to May 9, 2019, when the 11 year non-compliance was discovered. In my opinion, Attorney-1 leads one to believe that it is OK to play Russian roulette with the safety of the flying public for 4 days in addition to the 11 years that this aircraft had been operating out of compliance with the AD inspection requirements and hoping nothing happens in the meantime. It is not up to Attorney-1 to determine the seriousness of safety when it comes to an AD, he/she does not have that authority or the ability to determine the condition of an aircraft (in this case N710SW). The seriousness of safety was determined when the AD was issued in 2007. I would like to point out, that the failure of the Aft Pressure Bulkhead (while in flight on a JAL aircraft), caused a catastrophic event, killing everybody on board. As Federal Regulations state, Airworthiness Directives are issued to address unsafe conditions and compliance is mandatory, period.

The OIG report states that with respect to one remaining aircraft , the AGC informed the CMO that the matter warranted additional investigation to which according to the OIG report, a second FAA Supervisory Principal Maintenance Inspector (SPMI-2) told the OIG that the FAA Investigator provided additional clarifying information pertaining to the one remaining aircraft and that based on the totality of the information obtained, SPMI-2 stated to the OIG that the CMO management collectively determined that the matter did not warrant legal enforcement action and in lieu of enforcement legal action, the CMO closed the case by issuing a letter of correction. The OIG report also states that the Letter of Correction outlined that SWA satisfactorily re-inspected 1016 bulkheads on 306 aircraft that were affected by the AD (2007-25-03.

In reading the above, there are several misleading statements in the OIG report which point to deficiencies related with the OIG investigation:

- While the AGC and SPMI-2 are referencing one remaining aircraft (without identifying it), the OIG investigator was fully aware of my specific concerns with aircraft N710SW, however, the OIG report does not identify the aircraft other

than calling it "one remaining aircraft". It does not appear that the OIG investigator was interested in substantiating my specific allegations and did not question the identity of the so called "one remaining aircraft", which was N710SW.

- Regarding SPMI-2, he was acting and had no previous experience in that position. Regarding concerns I had raised associated with SWA's noncompliance to the requirements of another AD (90-25-01), the SPMI-2's position was that: "The carrier will do what the carrier wants to do". I reported my concerns to the CMO manager (who was also involved with closing the case) who responded that he was going to look into it but never did. If the OIG had performed an in depth investigation, they would have found out that SPMI-1 was forced out of the CMO due to his refusal to go along with the upper management and condone this type of events. It was then, when the CMO Manager started to bring actors (like SPMI-2) with no previous experience in that position and the: "The carrier will do what the carrier wants to do", attitude.

- There is no evidence (other than taking the word of SPMI-2) that the OIG investigator tried to substantiate the SPMI-2 statements regarding that the FAA investigator had provided additional clarifying information pertaining to the one remaining aircraft and that was the reason they (CMO Management) closed the case. If the OIG investigator had asked for evidence regarding the additional clarifying information that SPMI-2 was alleging, the OIG would have found out that there was none and that the case was closed on a decision to which SPMI-2 played a major role. In support of my statements, I am providing the September 18, 2020 email traffic, titled AFB (Aft Pressure Bulkhead) between myself and the FAA investigator (who was my assistant at the time, who the SPMI-2 alleges of providing the additional clarifying information pertaining to the one remaining aircraft). In the September 18, 2020 email the FAA investigator states:

"[redacted],
Legal said they don't have enough evidence to prove intent and take this case to court. In fact they pointed out that the evidence and actions SWA took to bring the aircraft back into compliance demonstrate a willing and able attitude from the carrier. I stressed the point that SWA did in fact violate 14 CFR 39.7, and operated aircraft in unairworthy condition until the AMOC was issued. Management suggested to close the case with a Correction Letter to which most participants on the call agreed."

The above email describes what took place at the final meeting (right before the CMO management closed the case), and also provides substantiated evidence of the FAA investigator's actual findings which discredit the unsubstantiated statement of SPMI-2 that the FAA investigator had provided additional clarifying information. This is very concerning because it is a critical deficiency of the OIG Investigation and appears that the OIG investigator (other

than going through the motions) was not looking for evidence to substantiate my allegations.

- Regarding the OIG statement of SPMI-2, that CMO management collectively determined that the matter did not warrant legal enforcement action, and that in lieu of enforcement legal action, the CMO closed the case by issuing a letter of correction, I would like to point out that when it comes to compliance with AD requirements the Federal regulations are crystal clear and so is our FAA guidance:

14 CFR, Part 39.11: "Airworthiness directives specify inspections you must carry out, conditions and limitations you must comply with, and any actions you must take to resolve an unsafe condition".

14 CFR, Part 39.7: Anyone who operates a product that does not meet the requirements of an applicable airworthiness directive is in violation of this section.

14 CFR, Part 39.9: "If the requirements of an airworthiness directive have not been met, you violate 39.7 each time you operate the aircraft or use the product".

14 CFR, Part 121.153, Aircraft requirements:
(a) Except as provided in paragraph (c) of this section, no certificate holder may operate an aircraft unless that aircraft--
(2) Is in an airworthy condition and meets the applicable airworthiness requirements of this chapter, including those relating to identification and equipment.

The CMO management does not have the authority to condone the operation of an aircraft in an unknown Airworthy condition and put the risk on the backs of the flying public (in this case aircraft N710SWA operating in revenue service with overdue AD inspections).

According to Title 49 of USC, Subtitle VII, Part A, Subpart III, Section 44701,
Only the Administrator may grant exemptions from a requirement or a Regulation, if the Administrator finds that the exemption is in the public interest.

I do not see where SPMI-2 and the CMO Manager have the authority to condone the operation of this aircraft and how such operation (with an unknown Airworthy condition) can be in the public interest.

The SPMI-2 and the CMO Manager did not have the authority to deviate from our guidance and close this case with Administrative action because Administrative action does not apply in the case of aircraft N710SWA, and it is contrary to the following:

FAA Order 2150.3, Chapter 5, 4:

4. Administrative Action.

a. Criteria. FAA personnel take administrative action when:

- Legal enforcement action is not required under paragraph 5.a., or warranted under paragraph 5.b.
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In this case Legal Enforcement action was required as per the following:

FAA Order 8900.1 Volume 14, Chapter, Section 1, Paragraph 14-1-1-7:

A. Required Legal Enforcement Action. The FAA views intentional, reckless, and some other types of conduct (as described in Order 2150.3, chapter 5, paragraph 5.a.(1)-(5)) as posing the highest risk to safe operation of the NAS, thus requiring strong enforcement. These matters are referred to the Office of the Chief Counsel (AGC)-300 for legal enforcement action.

1) Intentional Conduct: A deliberate act (or failure to act) while knowing that such conduct is contrary to a regulation or statute, or is otherwise prohibited;

SPMI-2 and the CMO management did not have the authority to deviate from the requirements of the above stated FAA Order. And again, there is no evidence that the OIG investigator other than taking their word, challenged the safety risk to the flying public that involved the operation of aircraft N710SW for 11 years without meeting the inspection requirements of the AD and continued in revenue operation in an unknown Airworthy condition even after the noncompliance was identified.

It is stated in the OIG report that SPMI-2 and the CMO Office Manager collectively decided to issue a Letter of Correction to SWA and was appropriate "to put some effective controls in place to prevent this from happening again ---------". It is important to state and the public to know, that later on, under the watch of SPMI-2, on January 6, 2022, SWA again using the VDRP disclosed the noncompliance to another AD and kept flying 198 affected aircraft instead of taking them out of service and perform the overdue AD inspections at the time of discovery. It is apparent that the so called "effective controls" that the CMO Manager and SPMI-2 had accepted and approved to prevent this from happening again were not so "effective" after all. In my opinion, it was just an excuse to cover their actions for closing the case to which the OIG investigator took for face value and did not question.

The January 6, 2022 event raises another concern directly related with the OIG investigation. On February 3, 2022 (while the OIG investigation was ongoing), via e-mail

(copying the OSC attorney handling my disclosure), I informed the OIG investigator of the January 6, 2022 events by stating:

"Attached please find another (recent) case where SWA disclosed a noncompliance to AD requirements and kept flying the aircraft in revenue service (did not seize the noncompliance at the time of discovery). This is what they did and caused the 2008 hearing and the exact noncompliance (not seizing the operation of the aircraft at the time of discovery of the noncompliance) that I have reported and you are investigating. Some things never change (business as usual). I believe this can be used as aggravating. Thank you for your support in ensuring public safety".

On February 11, 2022, since I had not heard from the OIG investigator, I sent another email requesting if the OIG investigator had received my February 3, email and stated that I felt that the January 6, 2022, event was important and supported the previous case that I had reported which was at that time under the OIG investigation (SWA kept operating affected aircraft even after the discovery of the noncompliance to the inspection requirements of an AD).

On February 14, 2022, I received an email confirmation from the OIG investigator that my February 3, 2022, email was received. Regarding my position that the latest (January 6, 2022) events were directly related to the OIG investigation that was ongoing at the time by the OIG investigator, the OIG investigator responded that the scope of the DOT OIG was limited to specific set of facts that gave rise to FAA's enforcement investigation in (2019SW290003) and to the extent that I was raising concerns about another separate and distinct action by SWA, the OIG investigator asked me to clarify if I wished to file another complaint with OSC or DOT OIG.

In regards to the above OIG investigator's response, I would like to point out the following:

The investigation that the OIG investigator was performing at the time (when I reached out and reported the January 6, 2022), was related to my May 2019 disclosure to the OSC regarding my concerns to a violation of Federal regulations where SWA had used the VDRP to disclose to our office (CMO) that they had discovered that aircraft (N710SW) was operating out of compliance to the inspection requirements of an AD. The CMO did not accept the report on the basis that SWA failed to take immediate action and cease the non-compliance upon discovery and instead kept operating the affected aircraft in revenue service in an unknown Airworthy condition with overdue inspections that were required by the AD. As a result our office (CMO) issued an enforcement investigation.

The January 6, 2022 events share the same scenario as the above May 2019 events, however, this time instead of 1 aircraft, SWA failed to take immediate action to cease another AD non-compliance upon discovery and kept operating 198 affected aircraft in revenue service.

Providing the OIG investigator with concerns that were directly related to the same safety concern that was currently under the OIG investigation (SWA continuing flying aircraft out of compliance with AD requirements and not taking immediate action and cease the non-compliance upon discovery), one would have thought that the OIG investigator would be interested while performing an investigation for the exact same safety risk/violation. I thought the scope of an investigation is to take an investigator to where the evidence is pointing (the root cause), and the January 6, 2022, noncompliance to another AD is evidence which substantiates that this is an ongoing issue. Why would an investigator not consider that as part of their investigation and instead ask if the inspector/whistleblower wished to file another complaint? Was that because the second event (January 6, 2022, AD noncompliance) provides substantiated evidence that there is a pattern and that was not part of the OIG investigator's scope?
Public funds were already being spent during the OIG investigation, I do not see a reason for another investigation for the same issue.

The OIG report also states that the Letter of Correction outlined that SWA satisfactorily re-inspected 1016 bulkheads on 306 aircraft that were affected by the AD (2007-25-03). For the record, that is impossible because each aircraft has only one (1) aft pressure bulkhead (306 total). That raises the concern as to how much validation/substantiation was done and the attention to quality of the OIG investigation.

The OIG report states that: "Given SWA's inadvertent acts, Attorney-1 stated that pursuant to FAA Order 8000.373: FAA Compliance and Enforcement Program, and FAA Order 2150.3C, Chapter 5, the facts presented in this matter were appropriate to address through administrative rather than enforcement action". The OIG report continues to state that: "OIG reviewed and verified that the cited FAA Orders were applicable to the circumstances of this case".

There are two questionable statements that raise great concerns regarding the above section of the OIG report:

1. It appears that due to the in depth deficiency of the OIG investigation, the OIG investigator allowed Attorney-1 to misrepresent the facts surrounding aircraft N710SW by referencing and including other aircraft (mudding the water) and the OIG accepted the operation of aircraft N710SWA as an "inadvertent act" in the one size fits all scenario that Attorney-1 made it out to be. My disclosure was very specific to the operation of aircraft N710SW which records show and provide factual evidence that on May 9, 2019, when SWA became aware of their eleven (11) year noncompliance to the AD requirements and made the conscious decision and knowingly kept operating this aircraft (N710SWA) in an unknown Airworthy condition contrary to Federal regulations that makes it intentional and not inadvertent as the OIG is misreporting. An additional aggravating fact is that I provided to the OIG investigator the entire document containing my specific

concerns that I had made in my whistleblower disclosure to the OSC. Therefore no excuse can be made that the OIG investigator only had a synopsis of my disclosure.

2. Regarding the OIG statement that: "OIG reviewed and verified that the cited FAA Orders were applicable to the circumstances of this case". That also questions the depth, direction and quality of the investigation due to the fact that intentional acts (as in the case of aircraft N710SW), do not qualify for Administrative action and require Enforcement action as clearly stated in the below FAA Order.

FAA Order 8900.1 Volume 14, Chapter, Section 1, Paragraph 14-1-1-7:

A. Required Legal Enforcement Action. The FAA views intentional, reckless, and some other types of conduct (as described in Order 2150.3, chapter 5, paragraph 5.a.(1)-(5) as posing the highest risk to safe operation of the NAS, thus requiring strong enforcement. These matters are referred to the Office of the Chief Counsel (AGC)-300 for legal enforcement action.

1) Intentional Conduct: A deliberate act (or failure to act) while knowing that such conduct is contrary to a regulation or statute, or is otherwise prohibited;

- In this case, despite the fact that the whistleblower provided a road map with concerns related to a specific aircraft, and the available plethora of evidence, the OIG chose to disregard the facts and instead relied and based their investigation on the information that Attorney-1 provided to the OIG investigator. My reported concern of the operation regarding aircraft N710SW is still ignored and not addressed in the OIG report. This raises the concern as to if the OIG's scope of investigation was not to substantiate my allegations and instead report unsubstantiated statements of the parties involved.

While the OIG accepted the references to the FAA Orders (8000.373, and 2150.3C Chapter 5), that Attorney-1 provided, if the OIG had thoroughly reviewed the referenced Orders and had compared them to the actual evidence, the OIG would have found out that:

FAA ORDER 8000.373, Compliance Program, under 4.b., states:
4. b. "The aviation and aerospace communities have a statutory obligation to comply with established regulatory standards".

I do not believe that knowingly operating an aircraft contrary to Federal regulations indicates compliance to regulatory standards.

FAA ORDER 2150.3C, Chapter 5, Compliance and Enforcement Program, under 3.a., states:
3.a. "When FAA personnel determine that a person is both willing and able to comply with regulatory standards, they may use the Compliance action".

In this case, evidence shows that at the time of discovery of the noncompliance, SWA was not willing to take aircraft N710SW out of service and comply with the overdue inspections requirements that were mandated by the AD. Therefore, the Compliance action does not apply. In accordance with the requirements of FAA Order 2150.3, chapter 5, paragraph 5.a.(1)-(5) the above operation of aircraft N710SW is posing the highest risk to safe operation of the NAS, thus requiring strong enforcement.

The OIG report also states that the OIG interviewed the supervising enforcement attorney, (referenced in the report as Attorney-2 in this matter) who according to the OIG report allegedly corroborated with the information of Attorney-1. The report also states that SPMI-2 told the OIG that Attorney-1 and Attorney-2 informed the CMO officials to address the SWA's overall inadvertent acts they could pursue the following actions: No Action, a Letter of Warning, or a Letter of Correction.

Again, concerned with the direction, lack of depth of the OIG investigation, and their relying on statements without substantiation (in this case SPMI-2 misleading statements) such as "SWA's overall inadvertent acts", I reached out to Attorney-2, who for years due to his prior extensive aviation experience has proven his ability in making data driven decisions in applying the regulations. I asked Attorney-2 as to how under the circumstances (where on May 9, 2019, when SWA became aware of their eleven (11) year noncompliance to the AD inspection requirements and made the conscious decision and knowingly kept operating this aircraft N710SW in an unknown Airworthy condition) contrary to Federal regulations which makes it <u>intentional,</u> actions such: "No Action, a Letter of Warning, or a Letter of Correction" could be suggested by an attorney as an option.

Attorney-2 responded that he would have never made such recommendation because the above actions do not apply in an intentional case (such as the one described above involving aircraft N710SW). Attorney 2 stated that our guidance requires Enforcement action.

Again, I believe that unless the OIG had an agenda (such as discrediting the whistleblower and confuse the public), the OIG should have done a better job in considering the specifics of my disclosure (look for the facts and substantiated evidence). In this case, based on the facts, the OIG investigation should have included the questioning of the statements of Attorney-1, the SPMI-2 and the CMO Manager for substantiation. After all, I had provided the OIG investigator with all the pertinent information (the complete document of my disclosure to the OSC, information via several emails, interviews, several telephone conversations and also provided additional

documents as it was requested). I was also available for any additional requests/questions (my disclosure was not anonymous, the OIG investigator had full access to me).

The report also states that the CMO manager stated to the OIG that the: " ------- SWA's actions were not egregious to the degree of reaching the simple penalty phase". In this inspector's opinion it is egregious that SPMI-2 and the CMO Manager despite the fact that they were so far out of touch with the regulatory requirements (or did not want to be confused with the facts) were able to convince the OIG investigator to ignore the following facts:

- Airworthiness Directives (AD) are issued to address unsafe conditions and prevent catastrophic events. Compliance with the AD requirements is mandatory by Federal Regulations. In this case, AD 2007-25-03 became effective January 14, 2008 and requires specific inspections at the Aft Pressure Bulkhead of certain Boeing 737 Models (to which aircraft N710SWA is one of the affected aircraft). The AD states that the inspections were a requirement in order to prevent a Rapid decompression of the aircraft and it was determined that it was in the public interest and air safety because it addresses an unsafe condition (the related regulations and mandatory compliance are stated previously in this document).
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- Despite the fact that SWA missed the noncompliance to the AD requirements during their 2008 AD inspections (that were mandated after the 2008 hearing by U.S. Congress where several SWA aircraft had overflown the inspection requirements of another AD), It took SWA 11 years to realize that this aircraft (N710SWA) was flying in revenue service out of compliance with the requirements of the AD mandated inspections. It is important to state that SWA was required at the time of discovery to take the aircraft out of service (that was flying for 11 years out of compliance) and comply with the required inspections. But instead, SWA decided to keep operating the aircraft in revenue service in an unknown Airworthy condition (with the overdue AD inspections) contrary to Federal Regulations and Airworthiness requirements. If jeopardizing the safety of the flying public is not egregious to the SPMI-2 and the CMO Manager, I do not know what is? I do not believe that this is any different than 2008 when SWA used the VDRP to report AD overdue inspections and kept flying the affected aircraft out of compliance. The same OIG performed the investigation back then and it was called egregious by several officials. What we have today are different ADs, different dates, but the same disregard for federal regulations and airworthiness requirements. The requirements of the Federal

Regulations and Airworthiness standards have not changed since 2008. In this case, based on the above, it appears that the OIG scope of investigation has changed and the results are not in the best interest of safety for the flying public. There is an accountability issue that has not being addressed and without accountability I do not believe that we can guarantee safety.

SUMMARY of comments Disclosure #1

Regarding the allegations related to my disclosure, the OIG report states: "Based on the foregoing, OIG found insufficient evidence to support the whistleblower's allegation as alleged".

While the OIG report states: "OIG found insufficient evidence to support the whistleblower's allegation as alleged". I would like to point out that the OIG report is only supported by unsubstantiated statements that were made during the OIG investigation by the very people that the allegations were against which the OIG took for face value. The OIG report provides no evidence that those statements were substantiated. This is despite the fact that I had provided specific and detail information that the OIG investigator could have used to challenge those statements during the investigation and ask for substantiated evidence. This is also aggravated by the fact that even when FAA personnel made statements in support of my allegations (as I have pointed out in this document), the OIG investigator took the liberty to misstate them. The facts show that I have provided data driven information along with the supporting regulatory and airworthiness requirements that substantiate my allegations, and also point out the deficiencies and shortfalls of the OIG investigation.

Under the circumstances, this inspector/whistleblower would like to go on record and state that I strongly believe that this is in retaliation and a deliberate attempt by the OIG to discredit me and confuse the public due to the fact that I have questioned and exposed the OIG's private meetings where the OIG shared and discussed their draft findings with SWA executives (which allegedly caused changes) prior to those findings becoming final and public record (for another safety related disclosure of mine to which I have signed a consent to become public information, OSC File No DI-20-000579).

Based on the information I have provided in this document, I am requesting that the OSC questions the integrity of the OIG investigation and request that the Office of the Secretary of the DOT perform an unbiased investigation.

Disclosure #2

On March 17, 2021, under the whistleblower program, I disclosed to the OSC that SWA was permitted by FAA Management to implement a process which requires FAA Airworthiness inspectors to fill out a Request For Information (RFI) form for aircraft records needed during the performance of our official duties in order to determine aircraft airworthiness and SWA compliance with the Regulatory and Airworthiness requirements. The RFI process impedes us (FAA Inspectors) from performing our official duties in a timely matter and making on the spot airworthiness determinations. In addition, I raised concerns regarding the involvement and the role an AAE investigator played in the RFI process which I believe was due to his close relationship with the SWA Director of Maintenance (DOM), Senior Director of Regulatory Affairs who is an ex FAA Manager.

REGULATORY REQUIREMENTS:

14 CFR, Part 119, Sec. 119.59, Conducting tests and inspections.

(a) At any time or place, the Administrator may conduct an inspection or test to determine whether a certificate holder under this part is complying with title 49 of the United States Code, applicable regulations, the certificate, or the certificate holder's operations specifications.
(b) The certificate holder must--
(c) Each employee of, or person used by, the certificate holder who is responsible for maintaining the certificate holder's records must make those records available to the Administrator.
(e) Failure by any certificate holder to make available to the Administrator upon request, the certificate, operations specifications, or any required record, document, or report is grounds for suspension of all or any part of the certificate holder's certificate and operations specifications.

14 CFR, Part 121.380a
(d) The certificate holder shall make all maintenance records required to be kept by this section available for inspection by the Administrator.
Title 49 of the United States Code (USC), Section 44701, SUB. VII, PART A (under air commerce and safety), states:
"The Administrator shall consider the duty of an air carrier to provide service with the highest possible degree of safety in the public interest".

Title 49 of the United States Code (USC), Section 44713, SUB. VII, PART A (under Aviation Programs-Air Commerce and Safety, "Inspection and Maintenance".
Congress requires an Air Carrier to perform inspections, repairs and maintenance in compliance with requirements, regulations, and orders. Under the same section, Congress also requires the FAA Administrator to employ inspectors to perform inspections in order to decide whether the aircraft, engines are in safe condition and maintained properly. This

section also requires that if the inspector determines that the aircraft, engine, is not in condition for safe operation, the inspector shall notify the air carrier in the form and way prescribed by the Administrator of the Federal Aviation Administration.

Please note: Title 49, or the referenced Parts of 14 CFR have no requirement for an FAA inspector to notify the air carrier or provide a written request for documents associated with the inspection other than in a case when an inspector determines that the condition for safe operation is questionable.

Furthermore, it has been decided by Administrative Case Law, that not only requested documents/records must be available for inspection, the FAA also has the Authority to temporarily take those records for the purpose of Inspection and photocopying.

REF: Administrative Case law:
1 N.T.S.B. 2053, NTSB ORDER NO. EA-408, 1972 WL 17124 (N.T.S.B.)

Where:

The Respondent challenged the Administrator's authority to take aircraft records from his home for copying and inspection, maintaining that such inspection must be accomplished on the aircraft operator's premises.

The NTSB Judge determined that:
These actions were within the broad investigatory powers granted to the Administrator by section 313 of the Act and implemented by sections 13.3, 61.39(f), and 91.173(c)(3), of the FAR. The Board thus believe that it was within the authority of the Administrator's representatives to temporarily remove these records for the purpose of inspection and photocopying.

While throughout the OIG report is referencing statements and opinions that the RFI process is not prohibited by guidance or regulation, I believe that based on the above stated regulations, an FAA inspector does not have to fill out an RFI form and wait for days to receive the required documentation from SWA in order to determine the airworthiness of an aircraft and the safety of the flying public.

As in the previous investigation (related to Disclosure #1 above) the OIG report in this case is also full of unsubstantiated statements and opinions (interestingly of the individuals that were involved with accepting the RFI process). During the OIG investigation, I provided the OIG investigator with an email (dated April 21, 2021, which was also part of my OSC disclosure) that I had received from the CMO manager after raising the above stated concerns and questioning his acceptance of the RFI implementation into the SWA Manual. In that email the CMO Manager states:

"[redacted], ------ During the time period around March 2020, AAE investigated the concern with SWA RFI process and determined that the process is an industry standard practice. The outcome of this investigation was a recommendation to include the RFI process in the MPM". (MPM- Maintenance Procedures Manual)

A similar statement is also in the OIG report stating that: "The CMO Manager reported that AAE investigated the CMO's implementation of the RFI process in 2020 and recommended to the CMO that SWA include the RFI process in the SWA's manual".

Despite the fact that it is crystal clear and the evidence substantiates that according to the CMO Manager, the RFI process to become part of the SWA manual was influenced by the outcome and recommendation of the AAE, the OIG report disregards the evidence and states: "Moreover, OIG found insufficient evidence to support that AAE officials improperly intervened to permit SWA to implement the RFI process".

The OIG report also states that the AAE investigator stated, "We didn't intervene based on my investigation. The RFI process was already accepted by the CMO on the Operations side". There are two (2) misleading statements regarding the AAE investigator statements that the OIG took for face value that need clarity, 1) the alleged investigation that the AAE investigator is referring to, and 2) the RFI process that the AAE investigator is stating that was already accepted. In reading the OIG report other than statements, it does not provide any substantiated evidence.

1. Regarding the AAE investigator statement: "We didn't intervene based on my investigation". While the CMO Manager and the OIG report keep referring to and imply that an AAE investigation took place, evidence shows that the AAE investigator did not perform an investigation. According to the AAE Director the AAE investigator "had volunteer to informally look into the matter". The substantiation of this statement is contained in the July 24, 2020, AAE Director's email response to my concern as to what kind of investigation the AAE investigator performed because he had not even interviewed me. The referenced email was also provided as part of my Disclosure to the OSC and the OIG investigator.

   Since the outcome of the AAE investigator's "voluntary and informal looking into the matter" generated recommendations that created changes which affected us (FAA Airworthiness inspectors) in the performance of our daily official duties, on August 4, 2020, via email, I raised my concerns to the AAE Director by stating that while the AAE investigator's "informal look into my concern" did not require clarity (transparency), and had no rules to follow, and somehow the result was put out there as a fact and painted the picture that there was nothing wrong with the RFI process, to which I found biased and unacceptable.

In the same email (August 4, 2020), I also raised the concern to the AAE Director regarding a telephone conversation I had with the AAE investigator on March 31, 2020 (also witnessed by a second AAE investigator) and an email I had sent him on July 22, 2020 questioning as to why he (AAE investigator) was providing opinions and advice on the RFI process that directly affected the daily performance of our inspector duties. The AAE investigator's response was that it was at the direction of his boss (AAE Director) and the AAE investigator also stated that was what he was hired for, making decisions based on his experience. I raised the concern to the AAE Director that I did not believe that the intent of the creation of AAE was for its investigators to provide opinions to Air Carriers especially when those opinions affect us (FAA inspectors). The referenced emails were provided as part of my Disclosure to the OSC and the OIG investigator.

On August 4, 2020, the AAE Director replied to my above referenced email (August 4, 2020) but did not respond to my stated concerns, the AAE Director stated: "We're doing the best we can with the limited authority we have, the resources available, and the large volume of complaints we receive". The referenced email was also provided as part of my Disclosure to the OSC and the OIG investigator.

On August 5, 2020, via email to the AAE Director, I again raised my concerns regarding the actions of the AAE investigator and stated that, "This Investigator during his voluntary and informal looking into the matter had cherry picked his "informal looking into" which by design produced a desired and controlled outcome". The outcome was to make the RFI process a requirement for the Airworthiness inspectors and part of the SWA MPM which was something that SWA was trying to impose on us for years. In this inspector's opinion, this was accomplished due to the cozy relationship that the AAE investigator and the then FAA Division Manager shared with the SWA Director of Maintenance (DOM), Senior Director of Regulatory Affairs who is an ex FAA Manager. The referenced email was also provided as part of my Disclosure to the OSC and the OIG investigator.

Regarding the AAE investigator and my concern of his voluntary and informal looking into the matter vs an investigation, on March 31, 2020, during a telecom (also witnessed by another AAE investigator that was on the call), while discussing another regulatory issue, I brought the concern of having problems getting aircraft records from SWA and that they were trying to impose the RFI process on us (FAA Airworthiness inspectors) and stated that I was afraid that due to the relationship of the FAA Division Manager and the ex FAA Manager working as a senior Director at SWA they would push it through. To my surprise the AAE investigator stated that he had the RFI discussion with both of them and he (AAE investigator) "did not see an issue" because it was used at FED EX

(where he, the AAE investigator and the FAA Division Manager had previously worked). I responded that if the FEDEX CMO made the decision that the RFI process was OK for them and it was OK to wait days for the aircraft records, I would like to point out that even though the same regulations apply to cargo and passenger aircraft, in my opinion, flying cargo on one hand and over 150 passengers on the other, it is apples and oranges when it comes to safety for the flying public. The above is documented in an email to the AAE investigator and AAE Director, dated July 22, 2020, which was provided as part of my Disclosure to the OSC and the OIG investigator.

While the OIG report states that the AAE investigator cited that intervening to permit RFI process, " is not the role of AAE", I would like to point out that it was his direct recommendation (result of his alleged investigation) that gave the CMO Manager and SWA the green light that caused the RFI process to become part of a controlled Regulatory manual that contains compliance to Federal Regulations and Airworthiness Requirements (SWA MPM).

Regarding my concerns with the AAE investigator and his, "voluntary and informal looking into the matter", in his July 24, 2020, email to me, the AAE Director stated: "the AAE investigator at the time of this informal review, had no knowledge that you were denied access to review documents and/or records while on site at SWA. If that is the allegation, we would accept that as a formal complaint and ask that you give us the opportunity to investigate", to which (based on my concerns with the questionable actions of the AAE investigator), I responded that I had made my decision not to request anything from him.

The July 24, 2020 e-mail from the Director of AAE states that during his "voluntary informal looking into", the AAE investigator interviewed several SWA CMO management personnel including the then Supervisor/Principal Maintenance Inspector (SPMI) regarding the RFI process. I found that hard to believe because the then SPMI was one of the SPMIs that for years has been rejecting the RFI process for the Airworthiness inspectors and so I reached out to him. In talking with the SPMI, he categorically denies that the AAE investigator interviewed or asked the SPMI for his input regarding the RFI process.

In my opinion which is supported by the facts, the AAE investigator did not want to be confused with the facts because the facts would have interfered with the controlled and desired outcome that he was after (to recommend the RFI process be part of the SWA manuals for the Airworthiness inspectors), and that is why he only talked to certain people and not even the person that had raised the concerns in the first place (this inspector/whistleblower).

Other than the OIG investigator accepting the statements from the individuals that were involved in making sure that the RFI process became a requirement for

the Airworthiness inspectors, this inspector does not see any evidence that the OIG investigator has substantiated those statements, especially the so called "AAE investigation". If the OIG had looked into it, it would have found out that at the very beginning, as early as March of 2020, one of the first people that the AAE investigator called was the SWA Director of Maintenance (DOM), Senior Director of Regulatory Affairs who is an ex FAA Manager. If it was not due to his cozy relationship, why would the AAE investigator instead of ignoring the facts and not interviewing the person that had made the complaint (the whistleblower), he was communicating and sharing opinions such as "he did not see an issue with the RFI process" with the SWA DOM who wanted the RFI process implemented in the SWA Manuals? Also let's not forget that the AAE investigator had volunteered for this "informally looking into the matter".

Since when a "voluntary and informal looking into a matter", which (unlike an official investigation), has no accountability, no controls, and no rules to follow but allows the volunteer (in this case the AAE investigator) to cherry pick the direction of the informal looking into (which produced a desired outcome by design), and allowed recommendations to be made, is considered substantiated evidence? Am I to understand that the OIG investigator could not substantiate my allegations based on this OIG investigation which is reporting unsubstantiated statements? I believe that the old saying, "trust but verify" applies here, the tax payers deserve better than that.

2. Regarding the existing RFI process on the Operations side that the AAE investigator is referring to and also stated in the OIG report, I feel for the benefit of the public interest, I have to provide some clarity. When it comes to specialty of FAA inspector functions/duties we have Operations and Airworthiness. Comparing the Manuals that apply to Operations to the Manuals that contain Airworthiness requirements are apples and oranges. Prior to the AAE recommendation (to make the RFI process part of the SWA Maintenance Procedures Manual (MPM), the RFI process was only part of the Operations Manual and SWA for years tried to put it in their MPM for the Airworthiness Inspectors (Maintenance and Avionics). And, for years Supervisory Principal Maintenance Inspectors (SPMI) have rejected the acceptance of the RFI process in the SWA Manual for the Airworthiness inspectors until the AAE investigator gave it the green light with his influencing recommendation to the CMO management, and his statement that, "he did not see an issue with the RFI process" to the SWA DOM.

The specialty for Airworthiness inspectors requires extensive aircraft maintenance records reviews and on the spot determinations regarding the airworthiness of aircraft. Filling out and sending an RFI form and wait for days for SWA to respond and make available the requested documents while the aircraft is operating is not in the best interest of safety, that is not what the

regulations state. For the above stated reasons, the RFI process was not a requirement for Airworthiness inspectors until it was influenced by the AAE investigator's recommendation.

The RFI process that the AAE investigator is referring to that was accepted almost 10 years ago for the Operations side is the SWA Operations Manual (SWOM) which was provided to the AAE investigator by the CMO Supervisor Principal Operations Inspector (SPOI) who has no authority on the Airworthiness side.

Manual requirements: In order to operate as an Air Carrier, among other things, one must have approved Operational Specifications (OPS SPECS). It is also required that the Air Carrier must have a Continuous Airworthiness Maintenance Program (CAMP) for the aircraft they operate. Along with the CAMP, the approved OPS SPECS also list the applicable Manuals which contain acceptable and approved sections outlining specific polices/procedures that describe how the Air Carrier complies with the applicable Federal Regulations and Airworthiness Requirements. One of those Manuals is the Maintenance Procedures Manual (MPM) not the SWOM.

The "agreed upon manual" that the AAE investigator is referring to, SWOM, is an Operations Manual containing information (mostly Policy) pertaining to the OPS side of the house which has nothing to do with Maintenance and it is not listed anywhere on the approved OPS SPECS for the Airworthiness side as an acceptable or approved Manual for the Regulatory/Airworthiness Requirements. The AAE investigator used the cookie cutter approach and imposed by recommendation a procedure (RFI) from a Manual (SWOM) which has nothing to do with Airworthiness and made its process (RFI) part of a Regulatory controlled manual (MPM) that contains Regulatory Airworthiness Requirements.

Regarding the OIG report that the "CMO Manager indicate that the RFI process was industry practice, implemented by other major carriers, and common in the way other CMOs interacted with their respective carriers", if the OIG investigator had looked for evidence would have found out that while other airlines have something similar to the RFI process on the Operations side, no other airline has such a restricting requirement as SWA on the Maintenance side (for Airworthiness inspectors) where we have to file an RFI even to get a telephone number for a contact at a SWA maintenance station.

In addition, regarding the notion that this is an industry standard, while the OIG investigator took the CMO Manager's word, the OIG report does not show evidence of substantiating the existence of such standard. I would like to ask where one can find such Policy/Standard because I have not found one yet. In addition, I hope that the CMO Manager and the OIG investigator understand

that even when there are documented industry standards they do not supersede the requirements of Federal regulations.

The OIG report states that the CMO Manager provided statistical data, which supported that the RFI process provides timely responses to inspectors by including a chart showing that 73 RFIs were returned the same day. Since the CMO does not track the time that SWA takes to respond to inspectors RFIs, it is apparent that the chart was provided by SWA and that would raise questions of its accuracy and which RFI's it is referring to - Operations vs Airworthiness. While Airworthiness inspectors complain during our meetings that sometimes it takes weeks to get the requested information, other than the CMO manager's word, there is no substantiating evidence in the OIG report for the actual source of the chart or the accuracy of the so called "statistical data".

Besides my concern that the OIG report contains un-substantiating statements as evidence for not being able to substantiate my allegations, there is an additional concern that the report also contains misleading statements. Regarding the RFI process and the people that were interviewed, the OIG report states, "In responding to the whistleblower's disclosure that the process itself poses a threat to public safety by delaying the production of necessary information and maintenance documents, the Front Line Manager concurred with the whistleblower's contention. Although the Front Line Manager acknowledged that SWA'S RFI process was implemented to align with other major air carriers, ----------. The Front Line Manager did not, however, provide specific examples in which the CMO received delayed information from SWA as a result of utilizing the RFI process and that delay impacted an airworthiness determination".

For the record, the Front Line Manager (referenced in the OIG report) used to be my supervisor who I had bombarded with in person conversations and phone calls regarding the struggle I was facing to get access to aircraft documents when I was out on the field performing surveillance on SWA. He also had the same complaints from other inspectors. The Front Line Manager was totally familiar with the RFI process and had the same concerns. Based on the above, in reading the OIG report, other than the Front Line Manager substantiating my RFI concerns, "the process itself poses a threat to public safety by delaying the production of necessary information and maintenance documents", I questioned the remaining OIG statements and out of concern I reached out to the Front Line Manager who stated the following:

1. Regarding the OIG statement, "Although the Front Line Manager acknowledged that SWA'S RFI process was implemented to align with other major air carriers". The Front Line Manager categorically denies that he ever made such a statement to the OIG investigator.

2. In addition, regarding the OIG statement, "The Front Line Manager did not, however, provide specific examples in which the CMO received delayed information from SWA as a result of utilizing the RFI process and that delay impacted an airworthiness determination". Again, in knowing that the Front Line Manager was fully aware of many examples, I reached out to him to which he stated that he did in fact provide the OIG investigator with examples like the time when I was in a Maintenance base in Seattle where a SWA aircraft was undergoing heavy maintenance and its records were readily available on the spot (right in front of me) on the SWA's manager's desk who told me that I had to go back to Dallas to review them. Again, the OIG report is misstating the facts.

In my OSC disclosure I also have raised concerns regarding my previous official disclosure to AAE for the Aft Pressure Bulkhead (operation of aircraft N710SW in an unknown airworthy condition) to which the same AAE investigator had allegedly investigated both (Aft Pressure Bulkhead and the RFI process) and had closed both cases with no concerns without even interviewing me. In the same disclosure, I also raised concerns to what I believe, the AAE Investigator's actions were influenced by his cozy relationship with the SWA DOM (ex FAA Manager). However, the OIG report does not provide any substantiated evidence that the OIG looked into the two (2) investigations that allegedly were performed by the AAE investigator to determine their existence and if they were unbiased.

SUMMARY of comments Disclosure #2

Regarding the allegations related to both of my disclosures #1 and #2 (Aft Pressure Bulkhead and RFI process), in the investigative summary, the OIG report states in part:

"The evidence gathered during the OIG investigation did not substantiate the whistleblower's allegations -----".

While the OIG report is referring to evidence gathered during their investigation, in reading the report, other than misleading statements (which I have pointed out in this document), and unsubstantiated statements that were provided during the OIG investigation (by individuals that the allegations were about), there is very little to almost nothing at all in the OIG report that this inspector/whistleblower can see that it meets the criteria of substantiated evidence that the OIG claims "gathered evidence".

I believe that the information (supported by documentation) that I have provided and my stated concerns regarding the OIG report, show that the necessary investigation was not performed in order to provide the essential evidence to substantiate my allegations.

Under the circumstances, this inspector/whistleblower would like to go on record and state that I strongly believe that this is in retaliation and a deliberate attempt by the OIG to discredit me and confuse the public due to the fact that I have questioned and exposed the OIG's private meetings where the OIG shared and discussed their draft findings with SWA executives (which allegedly caused changes) prior to those findings becoming final and public record (for another safety related disclosure of mine to which I have signed a consent to become public information, OSC File No DI-20-000579).

Based on the information I have provided in this document, I am requesting that the OSC questions the integrity of the OIG investigation and request that the Office of the Secretary of the DOT perform an unbiased investigation.

Respectfully

[redacted]

[redacted]
Aviation Safety Inspector

From: [redacted]
Sent: Friday, September 18, 2020 10:26 AM
To: [redacted]>
Cc: [redacted]>
Subject: RE: AFB

[redacted],

Legal said they don't have enough evidence to prove intent and take this case to court. In fact they pointed out that the evidence and actions SWA took to bring the aircraft back into compliance demonstrate a willing and able attitude from the carrier. I stressed the point that SWA did in fact violate 14 CFR 39.7, and operated aircraft in un airworthy condition until the AMOC was issued. Management suggested to close the case with a Correction Letter to which most participants on the call agreed.

[redacted]

From: [redacted]>
Sent: Friday, September 18, 2020 9:45 AM
To: [redacted]
[redacted]>
Subject: AFB

Hey [redacted], I understand you gave a good fight at the meeting (good job).
Could you please give me the status of the case.

Thanks
[redacted]