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To: Johanna Oliver, Esq.
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Ref: OSC File No. DI-21-000392

Subject: Pursuant to 5 U.S.C. § 1213 (e), (1), below please find my comments regarding the DOT OIG REPORT #I21A001SINV and their Supplemental Response (dated February 13, 2023) related the above referenced OSC File.

My name is [redacted]. For over 24 years I worked as an Aviation Safety Inspector with the Federal Aviation Administration (FAA) where I retired from 4 months ago. Prior to that, for over 20 years I worked in the airline industry 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 U.S. Office of Special Counsel (OSC) which are described in this document as ***Disclosure # 1*** and ***Disclosure #2***.

DETAILS

Disclosure #1

On March 17, 2021, under the whistleblower protection program, I disclosed to the OSC my concerns regarding a violation to Federal Regulations where it was reported that Southwest Airlines (SWA) operated aircraft 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 by FAA management, the violation (which has an impact on the safety of the flying public) was not addressed as required by Federal Regulations which is not in the public interest.

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".

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".

AD 2007-25-03 was issued in 2007 (not in 2008 as the OIG Supplemental Report states on page 2 of their response to the OSC). The FAA issued AD 2007-25-03 which requires specific inspections related to repairs at the Aft Pressure Bulkhead on certain models of the Boeing 737 aircraft. The AD states that the inspections are required in order to prevent a Rapid Decompression of the aircraft. (directly affects safety).

On May 9, 2019, via the Voluntary Disclosure Reporting Program (VDRP), SWA notified the SWA Certificate Management Office (SWA CMO) that during records review it was identified that one of SWA's Boeing 737-700 aircraft (N412WN) had overflown the inspections requirements of the AD (2007-25-03).

Upon receiving the VDRP from SWA (as he was required per FAA ORDER 8000.89, CHG 1, dated October 1, 2016 and Advisory Circular (AC) 0058B), the then SWA CMO Supervisor Principal Maintenance Inspector (identified in the OIG report as SPMI-1), reviewed the information of the submitted VDRP, and in further communication with SWA, it was

discovered that SWA kept the affected aircraft in revenue service and did not ensure that the noncompliance ceased upon discovery as it was required.

In order for a noncompliance to qualify and be accepted in the VDRP, one of the requirements is that the noncompliance must seize and be addressed at the time of discovery. In this case, according to records, while SWA reported the AD noncompliance to the CMO, SWA did not take immediate action to seize the non-compliance at the time of discovery, and instead kept operating the affected aircraft in revenue service.

Documented evidence shows that upon discovery of the non-compliance and while the affected aircraft were kept in revenue service, SWA also applied to the FAA for an Alternate Means of Compliance (AMOC) to the AD which was approved on May 13, 2019 (4 days after the initial discovery of the non-compliance). It is important to understand that AMOCs are not retroactive (from May 9, 2019, to May 13, 2019 when the AMOC was issued, SWA had no approval to fly any of the affected/non-compliant aircraft) which is contrary to 14 CFR Parts 39.7 and 39.9 and Airworthiness requirements.

On May 28, 2019, the then SPMI-1 rejected the VDRP and via an Enforcement (#2019SW290003) notified SWA of the apparent violation to the Federal Regulations on the bases that SWA failed to take immediate action and cease the non-compliance upon discovery as it was required and operated the affected aircraft contrary to Federal Regulations.

I am not going to waste anyone's time by commenting on the smoke and mirrors and the irrelevant statements that the FAA management and the AGC attorney have made which questionably the OIG investigator accepted on face value and hearsays without any documented evidence that made it part of the Supplemental Response to the OSC. However, I am going to make comments based on substantiated documented evidence.

The Supplemental OIG Report, **OSC Request #2** (on page 3), in the **response** section, it states that according to a second Supervisor Principal Maintenance Inspector (SPMI-2), the management's decision to close the case was based on, in part, information that the SMPI-2 received from the Investigator in an email that he had received from the Investigator on August 21, 2020.

In reviewing the (August 21, 2020) email that the SPMI-2 is referring to, the Investigator is quoting the contents of a July 10, 2020, memo that the AGC attorney had sent to the CMO. In his email, the Investigator is informing the SPMI-2 that according to the memo, Legal (AGC) was dismissing the case arguing that the missed repairs (AD inspections) were inadvertent and not systemic and the Investigator continuous to

restate in his email the statements contained in the July 10, 2019 memo that the AGC attorney had made.

While this could have been inadvertent, the AGC attorney's "not systemic statement" is baseless and very concerning due to the fact that it does not appear that the AGC attorney or the FAA management were interested or took the time to check the data bases, because I strongly believe that if they had done so, they would have found evidence that supports a chronic and systemic issue.

In addition, the fact remains that violations are based on **when the airline found out about their noncompliance and what they did about it**. In this case as the AGC attorney states in his memo, the affected aircraft (6) remained in service from May 9, 2019 (when SWA discover the noncompliance), to May 13, 2019 (when SWA received the approval of the AMOC). While I have provided the Federal Regulations that strictly forbit such operation, I challenge the AGC attorney, the FAA management and the OIG investigator to provide the Federal Regulation/s that allow such operation (knowingly operating aircraft in revenue service with overdue AD inspections without the required approvals).

In his July 10, 2020, memo the AGC attorney also states that between May 9, 2019 and May 13, 2019 (while the affected aircraft were kept in service, operating out of compliance, awaiting for the AMOC), SWA was in a daily contact with the CMO with updates of their inspections. For the record, no AGC attorney or FAA manager has the authority to condone the operation of the affected aircraft in revenue service from May 9, 2019 to May 13, 2019 without the approval of the AMOC **(which was issued on May 13, 2019 and its a common knowledge that AMOCS are not retroactive**). Again, while the attorney is mudding the water with the SWA's daily contact with the CMO, the attorney and the OIG have failed to provide as to what law, rule or Federal Regulation allows this type of operation.

I believe that keeping informed the CMO while operating aircraft in revenue service that are not in compliance with mandated AD inspection requirements and Federal Regulations, is what caused the 2008 Congressional hearing. However, there is one big difference here, unlike in this case, the public servants that were involved in 2008, were held fully accountable.

In his memo the AGC attorney makes the statement that, "The fact that an AMOC was ultimately granted allowing SWA to continue to operate these aircraft while inspections continued suggests the absence of a serious safety concern". Again, while the stated Federal Regulations are crystal clear (14 CFR Parts 39.7 and 39.9) and strictly prohibit such aircraft operations, other than opinions the AGC attorney has not provided any Law, Rule or Regulation that allows such aircraft operations, that is because there are none!

As a taxpayer and an Aviation Professional who has dedicated over 45 years of my adult life in aviation safety, I find the above statement very disturbing and concerning because it promotes the notion that despite the requirements of the Federal Regulations –in this case "nothing happened where is the problem". I do not believe that the tax payers pay public servants to condone the playing of Russian roulette with the safety of the flying public. The "little pregnant" scenario that is portrayed here is not in the best interest of the public.

It is not up to the AGC Attorney to determine the seriousness of safety when it comes to the mandatory inspection requirements of an AD. No AGC attorney has the authority or the expertise to determine the condition or the safety of an AD affected aircraft that has overflown required inspections that are related to safety. The seriousness of safety was determined when the FAA issued the AD back in 2007 making those inspections mandatory.

As the previous referenced Federal Regulations state, Airworthiness Directives are issued to address unsafe conditions and compliance is mandatory, period.

Operating aircraft in revenue service that are affected with overdue AD inspections (especially when the non- compliance on some of these aircraft went undetected for over 10 years) I would have hoped that it would have raised a concern with the AGC attorney and the FAA management. I would also like to point out, that during flight the failure of the Aft Pressure Bulkhead (that was contributed to a repair) on an aircraft operated by another airline, caused a catastrophic event, killing everybody on board.

In mudding the water, in his memo, the AGC attorney points out that in this case, SWA was proactive and supports it by referencing that SWA had correctly identified prior repairs on multiple aircraft during the 2008 AD Inspections. What the attorney fails to mention is the fact that the 2008 AD Inspections were mandated by Congress after the April 2008 Congressional hearing where according to the related OIG investigation, while SWA had used the VDRP, with the full knowledge of the CMO management, SWA, was operating aircraft with overdue AD inspections. In reviewing this case, and the Investigators August 21, 2020, email to SPMI-2, it appears that SWA missed this AD on aircraft N710SW even back then (during the 2008 AD Inspections).

I believe that there is a reason that the FAA management went Attorney shopping for this case and did not give the case to the local AGC who are very familiar with the SWA AD compliance issues.

The AGC Attorney's memo, gave an out to the FAA management to close the case by stating that the Enforcement case did not support that SWA engaged in intentional prohibited conduct. I believe (supported by the facts), that the AGC Attorney disregards

the Regulatory Requirements of 14 CFR Parts 39.7 and 39.9, and the content of the Enforcement which states:

"Based on the requirements of FAA ORDER 8000.89 (CHG 1, 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".

While the regulatory requirements of 14 CFR Parts 39.7 and 39.9 are crystal clear in prohibiting the operation of such aircraft, I challenge the AGC Attorney to show where 14 CFR Parts 39.7 and 39.9 require to prove intent. In addition, the fact that SWA applied for an AMOC at the time of discovery of their noncompliance (while kept operating the affected aircraft) indicates that they were fully aware of the noncompliance. In my over 45 years in the Aviation Industry, Part 39 never required to prove intent, just the prohibited operation of an aircraft to which the AGC Attorney and the FAA management with their smoke and mirror maneuvers avoided to address.

Regarding AGC Attorney's questioning the FAA's authority of grounding aircraft, based on the fact that **ADs affect safety**, I would like to point out the following responsibility which is placed by the 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 hope the above provides the answer to the attorney's question as to the authority of an FAA Inspector of grounding aircraft when he or she becomes aware of an unsafe condition.

Regarding the statements of SPMI-2 that the OIG investigator took for face value without substantiated evidence, for the record, SPMI-2 was just acting and had no previous experience in that position. Also, for the record, while he was acting, I had raised to him documented evidence of SWA's noncompliance to the reporting requirements of another AD (90-25-01).

To my surprise his response was, "The carrier will do what the carrier wants to do". I strongly believe that his response was due to his inexperience and not understanding the issue. Via email, I reported my concerns to the CMO manager (who was also

promoted with no previous experience in that position and very actively involved with closing this case). The CMO manager responded that he was going to look into it, but I never heard from him.

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 new CMO Manager started to bring actors (like SPMI-2) with no previous experience in that position with the attitude that : "The carrier will do what the carrier wants to do". How is that in the public interest?

It is stated in the OIG report that acting SPMI-2 and the CMO Office Manager collectively decided to close the case and issue a Letter of Correction to SWA. The OIG report also states that the CMO manager stated that it was appropriate "in order to put some effective controls in place to prevent this from happening again ------".

For the record, it is important to state, and for the public to know that later on, under the watch of the same (CMO Manager and acting SPMI-2), on January 6, 2022, SWA again using the VDRP disclosed the noncompliance to another AD inspection requirements and while they reported that they had seized the noncompliance at the time of discovery, it was found that they kept flying 198 affected aircraft in service out of compliance while they had applied for an AMOC.

It is apparent that the so called "effective controls" that the CMO Manager and the acting SPMI-2 had accepted and approved to prevent events like this from happening again were not so "effective" after all. In my opinion, which is supported by these new events, the CMO Manager and SPMI-2 used the excuse of the "effective controls to prevent this from happening again" to cover their actions for closing the case.

On February 3, 2022, (while the OIG was still investigating my disclosure to the OSC regarding the noncompliance to the AD involving the Aft Pressure Bulkhead), via email (copying the OSC attorney handling my disclosure), I informed the OIG investigator of the new and similar events of January 6, 2022 by stating:

"Attached please find another (recent) case where SWA disclosed a noncompliance to AD requirements and kept flying the affected aircraft in revenue service (did not seize the noncompliance at the time of discovery). This is ----------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 currently investigating. Some things never change (business as usual). I believe this can be used as aggravating".

On February 14, 2022, I received a response from the OIG investigator regarding my February 3, 2022, email. The OIG investigator responded that the scope of the DOT OIG

ongoing investigation was limited to a specific set of facts that gave rise to FAA's enforcement investigation 2019SW290003 (the noncompliance to the AD involving the Aft Pressure Bulkhead). To my surprise, despite the fact that the new case was very similar to the one that was under investigation by this the OIG investigator, the OIG investigator showed no interest other than advising me to file another complaint with OSC or OIG.

As a taxpayer, I believe that it would have been in the public interest for the OIG investigator to review the new case that I brought to her attention since it was very similar to the one that she was already investigating because taxpayers funds were already being spent on her ongoing investigation.

For the record:

Since in both cases (May 9, 2019, and January 6, 2022) SWA did not seize the noncompliance at the time of discovery, the CMO issued Enforcements for both cases. Enforcement 2019SW290003 for the May 9 2019, events and Enforcement 2022SW290024 for the events of January 6, 2022. **However, FAA management got involved and closed both cases.**

NOTE:

The events regarding the January 6, 2022, non- compliance (under the whistleblower protection program) was reported to the OSC and it is currently under review (OSC File No. DI-23-000192, RFR). I believe that it is in the public interest to know that the Enforcement (2022SW290024) associated with this case, went through the FAA headquarters and AGC legal process as a Civil Penalty, and even after the draft for a proposed Civil Penalty was issued (I believe six million dollars), the FAA management was still able to close the case with a letter of correction by using the similar smoke and mirrors and the maneuvering they used in closing Enforcement 2019SW290003 (Aft Pressure Bulkhead).

It is unfortunate for the public that these individuals are allowed to hide behind anonymity and navigate through the FAA ranks by being rewarded with promotions. As a matter of fact, SPMI-2 not long after he finished his acting as an SPMI at the CMO, he was promoted to a manager position in another office

Questionable information contained in the OIG Supplemental Report regarding Disclosure #1.

1. In the OIG Supplemental Report, the AGC Attorney goes out of his way to emphasize that it was the CMO management's decision to close the case.

2. According to the OIG Supplemental Report, the CMO SPMI-2 states that the case was closed based on part on information and clarification contained in an email that SPMI-2 had received from the Investigator on August 21, 2020.

3. However, in reviewing the August 21, 2020, email (that SPMI-2 is referencing), the Investigator is only quoting (word for word) the statements that the AGC attorney had made in his July 10, 2020, memo to the CMO. In his email, the Investigator is informing the SPMI-2 that Legal (AGC) was dismissing the case (and the investigator goes on by restating the AGC attorney's statements that were contained in that memo.

The above (1-3) represents a full circle, this is based on the fact that the AGC attorney claims that it was the decision of the CMO management to close the case, and the CMO management closed the case based on the AGC attorney's memo?

So much for the new information and clarification that the SPMI-2 claims that the Investigator had provided. What is concerning is the fact that as a Supervisor Principal Maintenance Inspector (SPMI-2 in this case) was responsible for being on top of things and yet, on August 21, 2020 (over a month later) he had no clue of the July 10, 2020 memo that was sent to the CMO from the AGC? And calls that new information and clarification?

What is also concerning is that somehow, the OIG investigator questionably dismisses and ignores the documented evidence (that I have provided to her) which show that on September 18, 2020, responding to my email request for an update, the Investigator (my then assistant) states that during the meetings with management, **"he** (the investigator) **had stressed the point that SWA did in fact violate 14CFR 39.7, and operated aircraft in an unairworthy condition until the AMOC was issued".**

Please note, that the September 18, 2020, Investigator's email to me provides documented evidence that the CMO management was fully aware of the violation because they were told by the Investigator. How can an OIG investigator allow documented evidence like this to fall through the cracks?

Concerns with the OIG investigation:

Contrary to the facts which are supported by documented evidence which I have previously provided to the OSC and the OIG investigator, and supported by the requirements of the above applicable Federal 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.

I would like to point out that other than statements, the OIG investigator is not providing any documented evidence of law, rule, or Federal Regulation/s that support the FAA management's and the AGC attorney's opinions that would have allowed the legal operation of the affected aircraft in revenue service from May 9, 2019 (when the noncompliance was discovered), to May 13, 2019 (when SWA received the AMOC), which as previously stated AMOCs are not retroactive.

Under the provisions of ***Title 49 of the United States Code (USC), Section 44701,*** **only the Administrator has the authority** to allow deviations to Federal Regulations providing that is in the public interest. Operating aircraft in revenue service with overdue AD inspections, contrary to Federal Regulations, I do not believe that is in the public interest.

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 Request For Information (RFI) Forms in order to obtain aircraft records that are 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 (FAA Inspectors) from performing official duties in a timely matter and making on the spot airworthiness determinations.

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) 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

(c) The certificate holder shall make all maintenance records required to be kept by this section available for inspection by the Administrator.

Regarding my disclosure the OIG Supplemental Report (in response to **OSC Request #7**-on page 7) states that the FAA Office of Audit and Evaluation (AAE) investigated the whistleblower allegations and after reviewing documentary and testimonial evidence, did not substantiate the complaint.

For the record, contrary to the OIG report, documented evidence shows that the Office of AAE did not perform an investigation as the OIG investigator wants one to believe. The OIG investigator was fully aware of this because during the OIG investigation I provided her with an email from the AAE Director stating that there was no investigation and that an AAE employee had voluntary look into my concern. The referenced email was provided as part of my Disclosure to the OSC and the OIG investigator.

Specifically, in July 22, 2020, I sent an email to the AAE Director questioning the type of investigation that was supposedly conducted by AAE because I was not interviewed.

On July 24, 2020, via email, the AAE Director responded to my concern and informed me that there was no investigation and that one of the AAE personnel, ""had volunteer to informally look into the matter". The referenced email provides evidence that there was never an investigation and contradicts the smoke and mirror notion that the SPMI-2 and the CMO Manager (the same players described in my Disclosure 1) convinced the OIG investigator to accept as evidence.

What is also concerning is the fact that according to the OIG Supplemental Report (in response to **OSC Request #9**-on page 8) it states that the CMO Manager stated that the decision to implement the RFI process is under the scope of the duties and responsibilities of an Office Manager. I guess the CMO manager and the OIG investigator ignore the fact that, making records available, upon request, during an FAA inspector's official duties is a must and mandated by the above stated regulatory requirements.

No CMO Manager has the authority to interpret the above reference Regulatory requirements by giving an air carrier 8 to 10 days to make available the requested records. Operating on feelings an opinions is not in the public interest.

Under the provisions of ***Title 49 of the United States Code (USC), Section 44701,*** **only the Administrator has the authority** to allow deviations to Federal Regulations providing that is in the public interest. How is the impeding of an inspector from access to records upon request in the performance of his/her official duties is in the public interest?

The specialty for FAA Airworthiness Inspectors requires extensive aircraft maintenance records reviews and on the spot determinations regarding the airworthiness of aircraft. I do not believe that 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 in the best interest of safety.

Other than taking the word of SPMI-2 and the CMO Manager's, the OIG failed to provide substantiated evidence that other Airlines have the same RFI requirements and processes for FAA Inspectors. For the record, while the CMO Manager is stating that other Airlines have this process, the RFI process that the CMO Manager has accepted makes it a mandatory requirement to get any record from SWA where the processes that other Airlines have in place are not a mandatory or a strict requirement.

It is disappointing that the OIG and the attorney portray the **"voluntary and informal looking into the matter"**, as an Investigation. Last time I looked up the requirements and the intent of an investigation the word **"informal"** was not part of it.

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 to cherry pick the direction of the informal looking into (which in this case produced a desired outcome by design), and allowed recommendations to be made, is considered substantiated evidence?

I was not even interviewed or given the opportunity to provide any information in this informal looking into!

Am I to understand that the OIG investigator could not substantiate my allegations based on this OIG investigation which is based on hearsay and the reporting of unsubstantiated statements? I believe that the old saying, "trust but verify" applies here, the tax payers deserve better than that, much better.

CONCERNS and Comments related to the OIG investigation regarding Disclosure #1 and Disclosure #2:

Referring to 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 -----".

To the contrary, I believe that the information (supported by documented evidence and Federal Regulations) that I have provided for both of my disclosures show that an in depth investigation was not performed by the OIG and as a result the essential evidence to substantiate my allegations was overlooked or ignored.

Under the circumstances, this 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 my disclosures and confuse the public by accepting the FAA managements hearsays. I believe that this is due to the fact that I have gone on record, 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 (which is related to another safety disclosure of mine, OSC File No DI-20-000579).

This is also aggravated by the fact that two of their own (OIG) investigators (who were very familiar with the above reference case) became whistleblowers themselves and shared similar concerns as mine but again, other than the OIG stating that they could not substantiate my allegations they did not even interview their own whistleblowers despite my multiple requests.

Makes one wonder as to why an agency wouldn't want to interview their own whistleblowers? This retired public servant believes that they did not want to be confused with the facts.

Based on the information and documented evidence (supported by the applicable Federal Regulations) that I have provided for both of my disclosures, due to the reasons stated above, I believe the OIG investigation and Supplemental Response were biased.

I am requesting that the OSC questions the integrity of the OIG report.

Respectfully

[redacted]

[redacted]
Retired Aviation Safety Inspector