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Mr. William Reukauf  
U.S. Office of Special Counsel  
1730 M Street, NW, Suite 218  
Washington, DC 20036

Re: Supplemental Report OSC File No. D1-08-1015, DI-07-2471  
(OIG Investigation 109Z000003SINV)

Dear Mr. Reukauf,

20 July, 2010

The final line of Mr. Ferrante's report says it all: "Other than heightened awareness of potential safety issues when Runway 27 is in use the AOV audit found NO EVIDENCE OF SAFETY MITIGATIONS SPECIFIC TO RUNWAY 27/18R OPERATIONS."

This is why I personally will not fly into or through Memphis International Airport, nor will I allow my family to - I truly believe the FAA has absolutely no regard for passenger safety when this operation is in use. Should I need to go to Memphis, I will fly into a different airport and rent a car rather than risk being a part of this operation..

Sadly, after almost three years, the problem still remains. Traffic landing Runway 18R at Memphis International Airport has a high risk of being involved in a mid-air collision with a late-stage go-around on Runway 27 during CRDA operations. The spacing requirements for staggered ILS operations to runways 18L and 18R while CRDA is in use virtually guarantees a tie where the flight paths intersect off the departure end of Runway 27.

This is simple, elementary school math. If Aircraft A is two miles from point X at 150 knots, and Aircraft B is two miles from Point X at 150 knots, what will happen when both aircraft travel two miles?

They will meet.

*In this case, at the same altitude with one aircraft configured for landing and another struggling to get and stay airborne.*

This supplemental document basically states AOV can't complete a study and submit a report in 9 months (since the runway reopened) despite the fact they already had two years worth of data (or more) to study the matter before the runway was closed. That level of inefficiency is beyond embarrassing. AOV was the very division that shut down the original 18L/27 simultaneous operation in the first place. Do they not consider any part of the consequences of their own actions? Does it make sense to fix one problem without considering whether or not you've made another? They borrowed from Peter to pay Paul on this one.

The OIG response to Item 9 in Mr. Westbrook's Memorandum was misleading at best. Quarterly refreshers are typically Powerpoint presentations that do not specifically include go-arounds. During my eight years at Memphis most (but not all) of these refreshers were completed in small groups or individually with no management present. Claiming they are "always a topic of discussion" during these refreshers is just not accurate. While go-arounds were occasionally discussed during team briefings, such discussions usually centered around a specific event that controllers or management deemed worth talking about because a better way to handle it was evident.

I say again:

"Other than heightened awareness of potential safety issues when Runway 27 is in use the AOV audit found NO EVIDENCE of safety mitigations specific to Runway 27/18R operations."

Item 6 in Mr. Westbrook's Memorandum references 75 events for which audio or radar data was available for review. This does not mention the fact a full 70% of the 232 events reported by Mr. Nesbitt had no audio or radar data available. No explanation has been provided as to why that data was not available given the agency had been ordered to retain it. How does that happen? Now the OIG wants to clarify what they meant without addressing the fact there was a very large amount of missing data for which no explanation will be provided. I believe it would be irresponsible to dismiss

the concerns about underreporting of errors given that enormous quantity of missing information and would consider it more than a little suspect.

In summary, It is absolutely unacceptable that another 9 months has passed and the agency – be it ATO or AOV – has been unable to accomplish anything toward making this situation safer. I worry that it will take a mid-air collision and loss of life to get anything accomplished. What will they tell the families of the deceased? Oops? Sorry? The FAA canned response? (“Safety was never compromised”)

A virtually identical scenario at Newark Liberty International Airport has generated new procedures to prevent these occurrences yet nothing has been done at Memphis.

WHY?

On a side note, another issue has come to light regarding the safety of Runway 27 that is not specifically air traffic related. There is a drainage tunnel that runs under the runway called the Hurricane Creek tunnel. There is significant evidence to indicate the runway is structurally unsound at this point and the walls of the tunnel appear to be buckling. Given the additional weight added to the runway during the resurfacing project, a catastrophic failure of the tunnel could be imminent. I strongly suggest this issue be investigated and action taken to prevent a different potential disaster related to this runway.

Sincerely,



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