

January 11, 2010

Karen Gorman
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Washington, D.C. 20036-4505

Subject: Comments on final report regarding American Airlines disclosure investigation by DOT IG, Reference OSC File No. DI-08-1623

Ms. Gorman,

I have reviewed the investigative report enclosed from the U.S. Department of Transportation dated June 25, 2009, and disagree with both the DOT OIG supplemental report and DOT Secretary LaHood's memo to OSC Special Counsel Reukauf dated August 13, 2009.

After a thorough review, it appears that the DOT OIG failed to fully investigate the disclosure made by myself to the OSC and to identify unlawful actions by FAA senior management personnel at the Southwest Regional Headquarters and FAA National Headquarters in Washington DC. This unlawful action occurred when these officials allowed American Airlines to operate Boeing 757-223 and MD-80 aircraft in non-compliance with Federal Aviation Regulations.

It is my opinion that FAA Senior Officials allowed American Airlines to operate these aircraft in non-compliance due to the possible negative impact that the grounding of nearly 424 aircraft may have had on their congressional testimony during April 3, 2008 before the Full House Transportation and Infrastructure Committee. On April 3, 2008 FAA senior managers testified before Congress that 99% of the CFR 121 operators were in full compliance with Airworthiness Directives that had been inspected during March 24-28, 2008 timeframe during the FAA National AD audit. The week following the April 3, 2008 hearing, American Airlines grounded nearly three hundred MD-80 aircraft for the

Airworthiness Directive non-compliance that was discovered the week prior to the hearing.

Following the Congressional hearing and the groundings, FAA personnel from the AMR CMO filed Enforcement Investigative Reports for the non-compliance of Airworthiness Directives that were discovered on American Airlines B-757 and MD-80 fleets validating the fact that these decisions made by the Senior Officials were contrary to Federal Aviation Regulations and FAA policy. Federal Aviation Administration policy states "An inspector who becomes aware of an unsafe condition in 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." It is my opinion that these FAA personnel involved in recalling the inspectors during their inspection were in dereliction of duty per the above policy.

All FAA inspectors including Division Managers and Senior Managers in Washington DC are required to adhere to the responsibility and authority that Congress has bestowed upon them under the law.

Sincerely,

A handwritten signature in cursive script that reads "Douglas E. Peters".

Douglas E. Peters

AFS-40 Quality Assurance Staff - Flight Standards Service
Aviation Safety (AVS) - Federal Aviation Administration