

Ms. Karen P. Gorman
Deputy Chief, Disclosure Unit
U.S. Office of Special Counsel
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Washington, D.C. 20036-3600

Dear Ms. Gorman

I have reviewed the reports sent to me that relate to OSC file number DI-08-2854. While I have disagreements with statements and conclusions made by both the Department of Transportation, Office of Inspector General (DOT OIG) and the Federal Aviation Administration (FAA), I have chosen to not discuss in detail each issue. The overriding issue is the failure of the FAA to adequately execute their duties in the best interest of the flying public, and that failure is allowing an unnecessary degradation in the level of safety to occur. To elaborate on the details of my disagreements with the report would only serve to shift some of the focus away from this primary issue.

The DOT OIG report appears to substantiate that the FAA, primarily the AMR-CMO, has not been effective in gaining compliance from American Airlines with certain known issues that negatively affect the safety of their aircraft. I believe the environment at the AMR-CMO does not place in high regard aviation safety or actions that are in the best interest of the flying public. It is not clear if this has been the result the actions of AMR-CMO office management, or if the culture in the FAA has created an environment where our management has had little choice in how they conduct themselves. The FAA report fails to address why the FAA Principal Inspectors failed to act when they were in full knowledge of problem areas at the airline. The FAA response to the OIG report appears to suggest, by omission, that no one acted inappropriately.

This matter should have at least suggested to the FAA that there may have been a problem with the conduct of the Principal Inspectors at the AMR-CMO, yet their report does not indicate that this was considered. At no time did anyone from the FAA seek a meeting with me so as to consider my perspectives of the problems. It should be questioned if FAA interest was in fully identifying and correcting a problem, or to simply plan on how to put this matter behind them. Was anything learned in their review of these issues, and if so, did those discoveries lead to changes within the FAA either locally or more widespread? Is the FAA interested in internal improvement?

I would ask, what does it take for the FAA to consider an issue to be a problem? Their report, by omission, indicates that lack of oversight at a major US carrier is not a problem. Failure to act with full knowledge of a safety concern is also apparently acceptable. If the FAA were to respond by stating that these things are not acceptable, I would have to ask why the FAA response stated nothing of how these deficiencies came to be in the first place. Did they know of the problems at the AMR-CMO but did nothing about them (they have been going on for years), or are they unaware of what is going on within their own organization? Any way you look at it, there is a problem.

The corrective actions cited by the FAA follow a familiar tone. On the surface, they sound good. But as a former FAA office manager once stated, "it does not have to be good, it just has to look good". It is common for us to say we have done "something" and with that, consider the job done. Verifying that "something" achieved the intended result is not so common. Doing "something" is easy. Ensuring effectiveness is not always easy. In this case, where is the assurance, plan, or promise that the effectiveness of their corrective measures would be verified to ensure all of the problems have been fixed? Is it acceptable for the FAA product to only provide a weak perception that everything is OK, or should our product contain actual substance where our actions have made a contribution to aviation safety?

It is likely that if the AMR-CMO Principal Inspectors had acted on their own, contrary to guidance and direction from their management chain, removal from their positions would be warranted. In reality, no apparent changes have been made, further supporting my belief that the Principal Inspectors were acting within the scope of the culture that has been created by FAA upper management.

This issue should cause two questions to be asked. First, what is the safety culture in the AMR-CMO? Second, what is the safety culture in the Flight Standards division of the FAA? In early April, 2010, a team of two FAA employees came to our office to interview Inspectors to be able to answer the first question. I understood that approximately fifty five Inspectors would be interviewed and I would be one of those Inspectors. The interviews were primarily based on a set series of questions. During my interview, I was told that the answers I gave were typical of what other Inspectors gave in their interviews and that the AMR-CMO did not appear to have much of a safety culture. I was told that their report would be shared at high levels in the FAA. Since then, no apparent changes have been made or actions taken to reverse that culture. I believe it was intended that a primary mission of the FAA, of which I am a part, is to promote aviation safety in a manner that is in the best interest of the flying public. I do not believe the culture in the FAA shares this opinion.

The FAA has cited quite a number of corrective actions they have taken or will take. I am unable to confirm that any of these have happened as stated. I have reason to believe that some have not happened as stated. It must also be noted that communication has virtually stopped from my supervisor. I have been loaded down with so many assignments that appear to only serve as a "mark on the bark", that I have been unable to monitor the current performance of my assigned fleet of aircraft, complete long standing open enforcement cases or to conduct follow up on past discoveries. Regardless if this is part of a plan or not, failure to conduct follow up results in no findings which will then be erroneously translated into improvements in the carrier's performance. Fewer inspection findings can be meaningless if one does not consider the level of diligence exercised during these inspections (if inspections were accomplished at all). For these reasons however, it is quite possible that some of the FAA stated actions have happened and I am simply unaware of it.

The whistle blower reports were intended to elevate issues regarding failures at the FAA. They were never intended to bring accusations toward American Airlines. American Airlines was only mentioned since they are in the center of the evidence. The DOT OIG report appears to have understood that distinction. The FAA response appears to have it backwards as the majority of corrective actions speak to the measures taken to correct problems at American.

Summary:

Is the FAA an organization that is committed to serving the best interest of our nation, or are they committed to serving the best interest of themselves? I sincerely hope the first is in fact the case. Unfortunately, the evidence I see from my perspective supports the second. If my perception is not correct and the first is in fact true, a commitment must begin at the top and those at the top must be interested in learning from our shortcomings and correcting those areas that do not support that goal. I challenge the FAA to show me, by actions, that I am wrong. If the first is true, count me in, I want to help.

A handwritten signature in cursive script that reads "Andrew G. Blosser". The signature is written in black ink and is positioned above the printed name.

Andrew G. Blosser