

U.S. OFFICE OF
SPECIAL COUNSEL
WASHINGTON, D.C.

DATE: (27-MARCH-2013)

FROM: Victor Juarez, Linda Guerra and John Valarinos, National Association of Government Inspectors, Fleet Readiness Center Southwest (FRCSW), Naval Air Station, North Island, San Diego, Ca. 92135

2013 APR 2 4:14 PM

**SUBJ: Office of the Naval Inspector General OSC DI-11-3779, 3872 & 38940
NAVINGEN 201103602 Report of Investigation Response**

The "ConCert Program" was originally an effort to improve quality, reduce time and cost that is associated with maintenance. Later the program was defined as giving ownership to the employees, making them responsible for their own product. The program has not resulted in improved processes, lower costs or given employees ownership. Instead it has degraded quality control and morale of employees.

- The selection and promotions of numerous artisans from WG-08/WG-10 to AI positions (Above the WG-10 rate) is no cost savings. This is above the journeyman rate, and labor costs are now more than in the past. The few QAs were retired, and replaced with even more AIs.
- The manner in which AI's are used reduces time off the aircraft and makes schedule the priority, over quality assurance.
- A conflict of interest is created when time for quality assurance inspections is dictated by your immediate supervisor's need to meet a reduced schedule, since supervisor's determine your performance evaluation, overtime and award base on him making schedule. AI's inspecting their coworkers product is also a conflict of interest, and this occurs daily.
- This program does not augment the Quality Assurance Specialist (OAS) work, but hinders it because of additional precautions the Flight Line QAs have to endure knowing minimally qualified artisans are performing verifications and rushed by scheduled. Previously, the QAs performing verification with the priority being quality, not schedule.
- Direction from Supervisors and team leads to make corrections to products during Flight Line or Confidence Inspections, without documenting the defect, negates the 'ownership' of product goal.

Clarification to the findings is addressed in the response below.

Page 1 #4

"Organization Level Maintenance" comparison to FRCSW "Depot Level Maintenance, FRCSW Depot Level Maintenance is a significantly more in-depth level of maintenance. Below are the definitions of each. As an example, the equivalent work performed at Boeing and other industry partners, an A&P license, certification by the FAA, is recommended and/or required.

O Level = O-level maintenance is the most basic level of maintenance, performed by an operating unit on a day-to-day basis in support of its own operations. The O-level maintenance mission is to maintain assigned aircraft and aeronautical equipment in a full mission capable status while continually improving the local maintenance process. O Level Maintenance consists mainly of parts changing and adjustments

I Level = I-level maintenance mission is to enhance and sustain the combat readiness and mission capability of supported activities by providing quality and timely material support at the nearest location with the lowest practical resource expenditure. I Level Maintenance is an intermediate level of repair consisting of minor repair of aircraft and components. Although more "in depth", I Level is still an elementary level of repair compared to Depot Level.

Depot Level = D-level maintenance is an depth, total disassembly, overhaul of an aircraft, engine or component, consisting of welding, plating, machining and reworking of components and assemblies back to acceptable tolerances required to be made ready for use. This Level of overhaul is performed at or by FRC sites to ensure continued flying integrity of airframes and flight systems during subsequent operational service periods. D-level maintenance is also performed on material requiring major overhaul or rebuilding of parts, assemblies, subassemblies, and end items. It includes manufacturing parts, modifying, testing, inspecting, sampling, and reclamation. FRC sites support O-level and I-level maintenance by providing engineering assistance and performing maintenance beyond their capabilities. There is little accomplished in the Fleet that would prepare an individual to be a Depot Level Inspector.

Page 2

ConCert artisans (AIs) selected were to be selected from skilled production personnel. By selecting an artisan with inadequate training, QA is compromised. Also AIs continue to work for production supervisor which continues to be a "Conflict of Interest". (80% on the job, 20% on Inspection/verification). AIs work beside the artisans they are Monitoring 80% of the time and then inspect their work. This can create tension in the workforce and/or conflict of interest. AIs work for a supervisor who is schedule driven and product driven, which creates conflict when the AI feels more time is needed for QA of the product. QAs act as a team leader for AIs. One QA did tell an AI to stamp off documentation on an aircraft was no longer there – we are obtaining documentation to validate. He has also told the AIs in an LCC meeting, not to document discrepancies, because it 'looks bad', which is wrong and creates more conflict of interest, favoritism, and the potential for serious failures in the aircraft. The process for documenting defects is also to identify production failures and correct them. If undocumented, that opportunity is lost.

Page 3 #7

There are no AI's at Flight Line, but QAS who are performing verification on flight critical inspections have more to inspect prior to flight line checks. There is a better opportunity to inspect work while panels are still open. The AIs do not have that qualification and QAS are no longer making inspections on the floor prior to panels being closed. Flight critical inspections are not performed by AIs. Many AIs have minimal Depot Level Maintenance experience and have not performed depot level tasks at the journeyman level. Inspection of flight critical verifications by AI's should be performed by qualified experience Quality Assurance Specialists. All Flight Critical Inspections should be accomplished by Qualified Quality Assurance Specialists. Anything less is a conflict of interest as was illustrated by the instrument found inop at the flight line that checked good in the hangar and wasn't even plugged in, and situations like the recent bearing issue that an IA would have no knowledge of where a QAS showed that regulations and guidelines were not being followed by production and management personnel.

ALLEGATION ONE:

Page 4/5 #13 (*NAVAUDSVC Audit being perform*)

If HRO has no meaningful criteria to evaluate applicants for AI positions, how can this allegation not be substantiated? Since even HRO cannot define what qualifications are required to perform these duties, can any sailor be hired to perform QA?

Page 6 #14

Prior related military experience is not equivalent to depot level experience. Maintenance performed in the fleet does not provide the experience to perform Depot level maintenance. Fleet aircraft are sent to the fleet fully operational and maintained. If fleet aircraft experience a failure, only minor repairs are performed by military members, (See "I", "O" & "D" Level definitions above)

Page 6 #15

Experience serving in the Navy (I&O Level) is not comparable to journeyman level experience. (See "I", "O" & "D" Level definitions above)

Page 6 #16

Defect numbers are being artificially inflated because management has been telling AIs to write more defects to make the program appear successful. Based on number of defects reported since 2007, AIs appear to be discovering as many defects as QAs did. The percent of defects now have gone down and we can provide data to substantiate that.

Additionally, Flight Line QAS are finding numerous defects when aircraft arrives. Many defects are being identified in the Confidence Inspection (CI) and are NOT typically tracked, unless it is a major defect. If the defect can be quickly fixed, nothing is recorded, yet missing one of these defects could endanger pilots and damage aircraft. If major defects are found on the Flight Line, these defects would result in Maintenance Action Form, (MAF). The number and type of "M" mandatory inspections are also being reduced by production, so AI's have fewer inspections to perform. A lack of defects found on the flight line is not a true indicator of production success or failure in regard to defects. QA's now have less to trend when defects are not identified, making it difficult to predict potential failures.

When ConCert failed to realize savings, leadership changed the goal to 'ownership', making each employee an 'owner' of the overall process. The practice of making undocumented corrections after AI has signed off on a product is in direct conflict with that ownership policy.

Page 7 #18

Individual Qualification Records (IQR) documents task identifiers and skill sets artisans are qualified to perform. (Numerous AI's selected did not have experience/skills documented as qualified and some had no IQRs. An Artisan without an IQR, showing that he or she has been qualified to perform a task cannot certify any tasks and should not even have a Certification Stamp, much less be any kind of an Artisan Inspector Stamp. IQR's identify Depot Level skill set vs. JQR which is a Navy I & O level document.

Even in the Fleet, a JQR does not establish qualification to perform a task. A JQR simply identifies that the trainee has witnessed or accomplished a task under a trainer. A completely signed off JQR qualifies the trainee for absolutely nothing. It is merely a check in the block. After a JQR is completed, a trainee is then tasked with becoming completely qualified. A JQR serves absolutely no function in a Depot Level Facility. A JQR serves no purpose which is quite often gunducked. In a Depot Level situation, the trainee accomplishes a task several times under supervision of a qualified artisan and will continue to do so until the trainer has deem the trainee qualified to perform a task. Each qualification is task related and not a general qualification. In the IQR, there are three endorsements. The trainee indicated he feels like he's qualified, the trainer indicated he feels the trainee is qualifies and the Supervisor signs off the trainee as task qualified, quite different from a JQR. A JQR is merely a training aid. As stated in the paragraph above, a higher number of Flight Line defects are being discovered but not necessarily documented, which indicates an increase, not a decrease in 'escapes' or undetected workmanship defects.

Page 9 #26

Aircraft Deficiency Report (AIDR) data is received months after the aircraft is received by squadron. AIDR for prototype E2/C2 program have increased. It was too soon to determine this for F/A-18 product line when IG was performed. Multi-line receives very few AIDR feedback and there currently no QAS "QE" to request feedback. No one is proactively seeking this data because the position is currently vacant.

Page 10 #32

Als selected have a hard time communicating the English language, skills may/can impede program effectiveness by not being able to comprehend maintenance manuals, instructions, and work documentation. If an AI cannot communicate in the English language sufficiently enough to interpret the maintenance manuals, he/she not only should not be an AI, he should not be working Production. All the Manuals are written in English and an individual must have a good command of the English Language. Manuals change in an ongoing basis and if one cannot read and interpret English, there is no way he can maintain the level of proficiency required for aviation maintenance, particularly in a Depot Level rework environment.

Page 16 #51

Comparison of ConCert "Als" to CDI/QAR. CDI/QAR verifies work performed at the Intermediate and Organizational level maintenance whereas Als perform verification on Depot Level Maintenance. (See "I", "O" & "D" Level definitions above) One of the most common phrases in "O" and "I" Level maintenance is, "Sign this off so I can CDI it", meaning the CDI performed the maintenance and since he cannot CDI his own work, he'll get somebody else to certify they did the repair so the CDI can sign off as an inspector. This happens every day in the Fleet and there is no room in Depot Level Maintenance for such a practice. There is no place in Depot Level Maintenance for a Concurrent Certifier or an AI. Both should be considered to be a conflict of interest and neither should exist.

Page 17 #53

Depth of rework (experience) is not relevant to Depot Level Maintenance. Not valid experience level of maintenance. (See "I", "O" & "D" Level definitions above)

Page 18 #57

NGC mechanics require A&P license/FAA certification. This licensing requirement is only met after extensive certification training, which is not required by the DoN.

Page 22 #74 For this statement to be true, better trained artisans and more experienced employees must be utilized. Also, when 1, AI's aren't identifying each other's deficiencies and, 2. Corrections are being made on the Flight Line without documenting deficiencies; the process owner is unaware of his/her deficiencies. That does NOT encourage ownership of product.

Page 23 #75

Comparison of artisan to CDI. CDI verifies work perform at the Intermediate and Organizational level maintenance whereas FRCSW artisans perform Depot Level Maintenance. (See "I", "O" & "D" Level definitions above)

Page 23 #76

Cost savings not shown on Risk Assessment List, by own admission there is a risk. Also cannot determine quality improvements by AI implementation when other programs are involved in improving quality and cost.

Page 24 #80

AIDR/DWO's are actually UP, not down. No secondary list (which was mentioned to IG investigators) was ever provided by the QA. The list was kept by QAS Don Jenkins who assisted in the implementation of ConCert program. The Secondary List was a means of circumventing QA in order to prevent documenting discrepancies so that it would appear Production had a zero discrepancy rate when in fact, there were discrepancies not reported, that allowed the costs incurred in time and materials not being reported or recorded. That constitutes fraud, waste and abuse, a practice that's easily hidden when oversight of maintenance is performed internally rather than an external unbiased Quality Inspector. While the list may not be in use now, it was used to document the initial AIDR/DWO reduction, which has now reversed.

Page 25/26 #82/#83

Union withdrew ULP on a filing technicality by recommendation of FLRA. The Union never entered into a memorandum of understanding (MOU) with FRCSW in the impact of changes.

Page 25 #82

Post Graduate School (NPS) was subjective as only the personnel involved in providing information were selected to provide only positive information about the program. The graduates were not given the evidence mentioned above, such as the Secondary List and the undocumented deficiencies. Also there is a disclaimer made by author of NPS report. *"The analysis of the data revealed that ConCert appears to effectively perform the quality verification function. Furthermore, the data shows that quality has improved; however, the source of the improvement cannot be linked solely to ConCert."*

Page 28 #91

Report on QA – Low moral/concern on communication between supervisors & QAS. QAS's are being pressured to certify AI's has caused great concern about the overall program and the integrity of the Quality Assurance Department at FRCSW. This also creates discontent and conflict among the workforce, who are required to work as a team to be effective and efficient.

Page 29 #96

Numerous artisans hired from WG-8 have been promoted to AIs. AI position is considered a stepping stone to higher positions. At the start of the program, Journey Level artisans did not want to apply for AI positions for a few cents more to perform additional responsibilities, but seeing that these positions are being used as a stepping stone to a higher rate, they have started applying for AI positions. Further research of All AI's hired and a review of rates held prior to selection should be performed.

Page 30 #98

IQRs document journeyman level task qualifications and skills. JQRs were created after concern was raised by QAS on AI qualifications. As explained earlier, a JQR is by no means a certification; it's merely a training aid. It has no bearing on being qualified to perform a task unsupervised.

Page 30 #100

FRCSW have Position Descriptions for journeyman level positions which identify task and skills required to hold this rate. PD's are created by OPM standards. Years of experience in a position that is not equal to the level of expertise demanded by the AI position should not be considered sufficient experience.

Page 31 #102(a)

AI's are selected prior to any comprehensive formal and OJT training. Some AI's have been selected by default (All that applied were selected because of a quota for hiring AIs had to be met). Anyone that applied and made the cert was hired regardless of qualification. It does not appear that anyone hired as AI has been released due to incompetency. Has the screening, hiring, and training been 100% successful? This is not normal for most programs, even upward mobility programs. Minimum qualifications must be met before awarding of the position, even if some positions are left vacant. Awarding inspector positions to unqualified individuals because of quotas must be prohibited.

Page 31 #103

If definition of a journeyman were not identified in the instruction or application as a qualification, then that leaves the AI position open for anyone to apply regardless of required knowledge or experience? If there are no set criteria for these positions then how can we be sure the applicant is qualified to perform inspections. In addition, even a Journeyman Level Mechanic does not have the specialized training in order to perform flight critical inspections. Flight Critical goes well beyond the spectrum of having the ability to have the ability to assemble or disassemble. This can be illustrated by an incident whereby an artisan installed a non-conforming bearing into an aircraft. Had it not been for a trained QAS performing his inspection, the aircraft would have been delivered to the Fleet with a non-conforming bearing.

- How is an AIs hired (What criteria is used)?
- What is the selection process?
- What is the screen out elements?
- What process is in place to identify/retrain/remove an AI that turns out not to be 'trainable' once OTJ training is completed?

Page 31 #104

PD states AI "must be "journeymen" and the announcements now (2012) also states "must be journeyman to be an AI. Numerous AIs selected were not at the journeyman level when they applied for position.

Page 32 #105/#106

The job announcement and language for positions states that the AIs will perform journey level work. The screen out element is for the application and there is no validation prior to selection that the applicant is qualified for a journey level position. If an Artisan has not attained WG-10, then the Artisan has not demonstrated his/her qualification as a Journeyman Level Mechanic. WG-8 Artisans have not yet attained Journeyman Artisan, and should not have been selected to perform Journey level AI work.

Page 33 #107/#110

Definition of journeyman was answered by complainants as to what their definition of a journeyman was. A proper definition would be from OPM. The HRSC definition states that to be considered a journeyman, the applicant must have performed at the WG-10 (or equivalent) level. If this is the criteria, how did WG-8 applicants get positions as AIs?

Page 34 #111

Definition of journeyman is a basic definition, but for AI positions perform "Depot Level Inspections" should be better defined. The basic definition should be a baseline and depot level maintenance should be an addition to the baseline because of the criticality of work to be inspected and verified.

Page 36 #118

To clarify the definition of WG-8 (worker level) and WG-10 (journeyman level) is common language used to identify artisan skill sets for depot level work performed. Both HRSC and Ms. Morgan stated that journeyman/journey level is typically identified at the WG-10 level, while WG-8 level is 'routine' and worker level.

Page 37 #120/#121

WG-8 employees selected had not been performing journey level work. Twenty years working as a 'worker' in one area does not qualify someone to inspect quality in another area.

In order to understand "experience", one must first understand the different levels of Aviation Maintenance. There are three very different categories of maintenance, "Organizational", "Intermediate", and "Depot levels" of maintenance. "Organizational" is essentially unbolting a part, bolting on another part and making the necessary adjustments, pertinent to the installation of the new part. It is extremely basic and little more than, "Parts changing". Intermediate level consists of making minor repairs to components, but again, not much more than a little deeper level of parts changing. Neither provides what could be considered "experience" in Depot Level Maintenance. Depot Level Maintenance consists of a total disassembly, rework or replacement of the necessary component parts required to bring the component of aircraft back to a Reworked or Overhauled status. To attain a Journeyman Level status, one must have years of Depot Level experience. Neither Organizational nor Intermediate level experience provides the training or the experience to be a Journeyman Level Artisan in a Depot environment. Organizational and Intermediate maintenance cannot be considered "experience" as a Depot, Journeyman level Artisan.

Page 37 #122

Averaging time is absurd! Navy I Level and O Level experience which is not the same as depot level experience. You cannot average I and O Level experience and substitute it as Depot Level experience. The required skills are not the same.

Page 38 #129

Prior experience is irrelevant to journeyman Depot Level Maintenance experience. (See "I", "O" & "D" Level definitions above)

Page 39 #131

How can a contractor applicant's experience and skillset be validated if the IQRs cannot be provided? Current FRC employees would be required to produce that documentation for consideration of employment. Contractors are required to use FRCSW forms. IQRs are reviewed by the QAS to ensure compliance and qualification to perform tasks artisans are performing and certifying, so we know the data exists. Contractors do have IQR's identical to FRCSW Employees and they should be available for review. Contractors must meet the same requirements and maintain the same documentation. FRCSW QA should have access to all artisans, organic and Contractors.

Page 39 #133

IQR is reviewed prior to issuing an AI stamp, but there is concern when artisan selected for AI positions do not have basic requirements, and/or no IQRs at all. This raises a concern with QA when they are asked to certify an AI who has not even performed basic tasks. IQRs are just "Pencil whipped" to qualify these AIs. This practice compromises the integrity of the entire Depot, the safety of the aircraft, and people's lives.

Page 40 #139

All artisans/employees performing maintenance on or around aircraft require egress training. This is a COMNAVAIRFORINST 4790.2B (NAMPSOP) requirement. How can it be that Mr. Fields lacked this basic requirement? What is being done to ensure all persons working on or around aircraft have this training?

Page 41 #142

QA's review selected AI's IQRs; however the AI's qualifications do not meet the initial selection criteria. If they are not qualified on their IQR's then how can their resume indicate they are depot level qualified (exception to previous depot level experience)?

Page 41 #143

However, QA in-depth— does not require being the expert, but has knowledge of and skills to ensure compliance. QAS on the floor have trade-related backgrounds and product line experience working on the product prior to becoming a QAS. After being selected for QA, the trainee undergoes extensive QA training. There's more to QA than watching an artisan torque a bolt.

Page 41 #144

Only QA managers are included in the selection process. Leadership has a goal for a specific number of AIs hired. They numbers are low right now, so hiring is pressurized. Recently a WG8 hired as an AI leader due to meet the hiring goals. This is not creating good quality and expertise in the AI program.

Page 42 #146

If an AI can see issues with AI selected, then this should be a concern that should be addressed. A management review was performed, however no improvements in the process were made.

Page 42 #149

If an AI has identified that there is pressure to get AI certified then this is a "red flag". These are concerns brought up since the onset of the program.

Page 42 #150/#151

The only Cost Savings is to the QA department reducing the number of QAS. The number is expected to increase, since the 'savings' is outweighed by the risk to quality, assets and life. Therefore, no cost savings will be realized in this area, and an increase in cost could result from the requirement for more inspections due to hiring inexperienced unqualified AIs.

Page 44 #154

To clarify details, it is stated that one of the complainants was an apprentice graduate was not expressed because the complainant was not the topic of the investigation. The complainant was providing information on a way to attain journeyman level from a worker level position.

Page 44 #155

Potential problems exist throughout this program. Falsification of a resume is illegal, so why has this person remained employed? This is a great concern, especially if these applicants are verifying "Flight Critical" maintenance.

Page 44 #156

Resume incident is not an isolated incident to the E2/C2 program. This type of practice has gone on for the multi-line and F/A-18 programs. It also may go on at the other programs. Will these complainants be involved in and/or provided the outcome of NIGHTS 201203116?

Page 45 #159

Experience Navy vs. Depot. (See "I", "O" & "D" Level definitions above) I and O Level provide only the very basics for Depot Level Maintenance.

Page 50 #186

. QA's are pressured to sign off an AI as certified after three reviews of the same task, even if the QA does not feel the AI is qualified. This is NOT in the best interest to the fleet.

Page 51 #188/#189

AI's have been made permanent within months of being selected, whether fully trained or not. Please review the time in position and the documentation of training for AIs in question. The duties and skillset take time to learn and cannot be accomplished in such a quick time. These AIs have been promoted to P&Es, E&E, and the business office in months, while QAs with more advanced experience and corporate knowledge are not considered. QAs are told NOT to write up AIs as they are held in higher regard.

Page 51 #190/#191

FRCSW requires IQR documentation to ensure certification, training & skills able to perform.

Page 52 #192

AI training is not trade training, artisans skills should already be in place. QAS are pressured QA managers to certify AIs, even when they have not exhibited the expertise. QA's are task to sign off an AI as certified even if the AI is not qualified. Evidence of this pressure has been provided to the IG office.

Page 52 #193

Training of AIs requirements has changed from the start of program, which may indicate a deficiency. All AIs should have equal training and expertise in their area.

Page 52 #195

A written test is now given to AI's after they are selected. What is the process in place when the AI does not pass the written test for a position for which they have already been hired? Also, previous AIs hired did not have to be tested; with testing be retroactive?

Page 53 #196

QA is presumed to certify AI. QAS are pressured to certify AIs. QA's are task to sign off an AI as certified after three reviews of the same task even if the QA does not feel the AI is qualified.

Page 53 #198

Pressure is put on the QA to certify the AI so they can receive their AI stamp and begin certifying work.

Page 54 #204

JQR was created due to training concerns. JQR was not previously available. JQR is a training aide. IQR is the appropriate documentation to qualify inspectors. A JQR is a Fleet tool / training aid for very basic instruction. A JQR is merely a check in the block of exposure to a task. A JQR has no place, nor is it useful in a Depot Level environment.

Page 55/56 #207 #211

QAS was pressured to certify AIs. QA was tasked to sign off an AI as certified even when he felt the AIs were not qualified.

Page 58 #218

Crew Leaders do not determine when an AI is qualified to perform AI functions. This is not a ConCert Program process.

Page 58 #219

The union does not track AIs, but there are AIs that are no longer in the position. The union is aware of two AI's removed for medical reason (could not perform tasks during light duty or OIWCP status). Also, the union is aware of an AI that was allowed to continue his AI position even after a failed drug test. (AI was removed from the drug testing program). Current Security Clearance requirements in place should have had this individual removed from these duties

Page 60 #224

Baleser (AI) – Performance Observation/DWO's can be pulled from QAWB and Observation/DWO tracking system. If AI's are performing tasks correctly and inputting task into the QAWB Program, then all information should be available to track each AI's performance.

Page 60 #225

Navy Level Experience vs. Depot Level Experience. (See "I", "O" & "D" Level definitions above)

Page 60 #226

AI performance rate (discrepancies noted) not listed for previous AI can skew the AI defect rate. Previous discrepancies not shown can show a misleading perception on how AIs are performing. Specific to an AI inspection numbers

Page 61 #228

The Confidence Inspection is performed to catch any defects prior to flight line inspections. The QA's are directed by QA managers not to write up defects found, but instead to fix them on the spot. This directly undermines the ability to identify artisans and/or AIs that are creating the deficiencies and provide ownership to them for those deficiencies. It also hinders trending of issues/defects discovered and the ability to take preventive actions.

Page 62 #234

JQR was created due to issues brought to the attention of the Quality Department. JQR was not previously available. JQR is a training aid, established after initial complaints. IQR is the appropriate documentation to identify task and maintenance requirements. There is no place for a JQR in a Depot Level facility.

Page 62 #235

Trade skillsets should have been accomplished prior to selection. AI training should be on verification process. That fact that the AIs themselves stated the training period isn't sufficient should be a strong indication that the training is lacking and that AIs are not qualified to perform inspections without further experience and training.

Page 63 #239

No consistency with the ConCert Training. The AI training program changes as to what is needed at that time to get AI's certified and on the product. It appears to be more schedule driven, rather than quality driven training. This result is to be expected, given the conflict of interest created by ConCert and the AI program in general.

Page 65 #244

Work documents are provided for work tasks performed. Areas disturbed or worked on without proper documentation is a discrepancy that the AI should have found and is part of their AI responsibility.

Page 65 #245

This practice of pressuring QAs to certify an AI who is believed to not be worthy of certification continues to this date.

Page 65 #246

Defect rates for AIs are being skewed by QAs being directed to correct deficiencies without documenting them.

Page 65 #247

Continuous changes for AI training can only lead to improperly trained AI's. There is no monitoring/evaluation for AI performance. Supervisor will monitor 80% of their performance while QA only looks at data and a surveillance call which is preselected by the AI. The AI can select an easy call for each time they are to have a surveillance perform on them. QA should be tasked with verifying the performance of the AIs. If training deficiencies are identified, then all AIs should be retrained on that deficiency, not just the new ones coming in.

The QAs should have input to the inspection criteria, based on deficiency findings that are being missed by AIs, corrections being made during the flight line or confidence inspections, and other identified deficiencies.

Page 72/75 #284/#297

Continuous practice (QA for program is aware).

Page 80 #316

There is a concern over the integrity and confidence to put production ahead of quality in an aviation environment.

Page 93 #383

The failure to mention the apprentice program was not intentional but the complainant did not believe it to be relevant to the issues address about the ConCert Program. The complainant was addressing the concerns of the ConCert Program and only mentioned the apprentice program as one avenue for worker level artisans to gain the skills and experience to perform at a journeymen level. Being an apprentice graduate was not expressed because the complainant was not the topic of the investigation and the apprentice program was not an issue. That said, the 4-year apprentice program produces a much higher level of expertise than the current process and training.

The ConCert Program provides no financial nor quality advantage. ConCert is a conflict of interest and provides no value added. ConCert causes great concern for safety of flight. Corruption in hiring practices further amplifies safety concerns.


Victor Juarez DATE 28 MARCH 2013


Linda Guerra DATE 3/28/13

John Valarinos DATE

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