



THE SECRETARY OF TRANSPORTATION  
WASHINGTON, D.C. 20590

May 16, 2014

The Honorable Carolyn Lerner  
Special Counsel  
U.S. Office of Special Counsel  
1730 M Street NW., Suite 218  
Washington, DC 20036

Re: OSC File No. DI-13-4206 et al.

Dear Ms. Lerner:

By letter dated March 11, 2014, you referred for investigation disclosures from five air traffic controllers (ATCs) from the Detroit Air Traffic Control Tower (DTW), in Romulus, Michigan. The whistleblowers alleged: (1) Federal Aviation Administration (FAA) management has failed to properly address frequent and systemic problems with computer-based systems designed to automate the filing of flight plans and the delivery of departure clearances; and (2) FAA management has failed to properly staff the facility by leaving the operations manager position unfilled for 5 years.

I delegated investigation of these allegations to FAA's Office of Audit and Evaluation (AAE). Enclosed is FAA's Report of Investigation (ROI) which substantiated the first allegation but did not substantiate the second allegation. With regard to the former, the investigation determined that because FAA does not have statutory requirements or enforcement mechanisms in place to ensure flight plans are filed using established protocols, duplicate flight plans for the same aircraft are sometimes entered into the National Airspace System (NAS). The investigation found that duplicate flight plans introduce a safety risk into the air traffic control system with potentially conflicting information being acted upon by controllers and pilots. The investigation found that ATC facilities across the NAS are encountering this problem on a regular basis and that it is significantly more common during inclement weather periods.

The FAA has had a working group studying this issue since late 2012; however, due to organizational changes and workload, it has had limited success. In response to this investigation's findings and recommendations, the Air Traffic Organization has provided a corrective action plan in which it commits to taking immediate action to address the findings associated with duplicate flight plans. The corrective action plan is attached to the enclosed report.

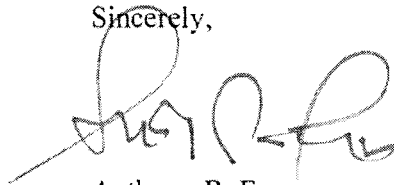
The investigation did not substantiate the allegation that DTW has not had an operations manager (OM) in 5 years. In 2012, DTW's OM was promoted to Air Traffic Manager (ATM) when the Agency divided Detroit into two separate facilities: DTW and the Detroit Terminal Radar Approach Control (TRACON). The DTW now has an ATM and a Support Manager who

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The Honorable Carolyn Lerner

are devoted exclusively to the tower's operation. The OM and Support Manager functions are being combined in facilities where a tower and TRACON are co-located in the same building. During their interviews as part of this investigation, none of the whistleblowers indicated they believed the lack of an OM was unsafe and the investigation did not find that the elimination of a single manager position at DTW was a safety hazard.

I am grateful to all five whistleblowers for raising these concerns and appreciate the opportunity to review this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony R. Foxx', written in a cursive style.

Anthony R. Foxx

Enclosures

**Federal Aviation Administration  
Report of Investigation  
To the Secretary of Transportation**

**In response to:**

**U.S. Office of Special Counsel (OSC)**

**File DI-13-4206 et al.**

**Director, Office of Audit and Evaluation (AAE-1)  
Federal Aviation Administration  
Washington, D.C.**

**April 17, 2014**

## Executive Summary

In March 2014, the Office of Audit and Evaluation (AAE), Federal Aviation Administration (FAA), was directed by the Secretary of Transportation to investigate a U.S. Office of Special Counsel (OSC) whistleblower disclosure (OSC File No. DI-13-4206 et al.) sent to Secretary Anthony Foxx on March 11, 2014. AAE is an independent FAA organization with authority to conduct oversight of all FAA organizations and programs. This disclosure was submitted by Vincent Sugent; John Overman; Corinna Morris, Michael Redies, and Lewis M. Bird, air traffic controllers at Detroit Air Traffic Control Tower (DTW), Detroit Metropolitan Wayne County Airport, Romulus, Michigan.

The whistleblowers alleged that: (1) FAA management has failed to properly address frequent and systemic problems with computer-based systems designed to automate the filing and amending of flight plans and the delivery of departure clearances; and (2) FAA management has failed to properly staff the facility by leaving the Operations Manager position unfilled for approximately five years.

We found that since the FAA does not have statutory requirements or enforcement mechanisms in place to ensure flight plans are filed using established protocols, duplicate flight plans are sometimes entered into the National Airspace System (NAS). Duplicate flight plans contain the same aircraft identification and departure airport, but some flight parameters are different from the original, such as requested altitude, routing, speed, or departure time. We have learned that air traffic control facilities across the NAS are encountering this problem on a regular basis, and it is significantly more common during inclement weather periods.

Duplicate flight plans introduce a safety risk into the air traffic control system with potentially conflicting information being acted upon by air traffic controllers (ATC) and pilots. When multiple flight plans are filed for the same flight, there is the potential that a controller can clear the flight for departure based upon a flight plan that is different than the one most recently filed by the operator, which could result in the crew flying a route not anticipated or planned for by ATC. We also found that the FAA has no current automation system capable of identifying or "flagging" these multiple flight plans and notifying the controller.

Analyses of flight plans being sent from the airline filers to FAA's Central Computer Complex host, referred to as HOST, and the En Route Automation Modernization (ERAM) automation systems indicates that some airline dispatchers are not following the proper protocols. Instead of having existing flight plans amended, they are entering new flight plans without removing the original flight plan, as current protocol suggests. However, we also learned that FAA lacks standards across the NAS for the length of time a flight plan is active, which makes it difficult for dispatchers to comply with FAA protocols. For instance, a typical flight plan has a time limit of two hours to execute, or it expires, and a new one must be filed. We found, however, that some Air Route Traffic Control Centers (ARTCCs) allow for three hours before expiration. At Cleveland ARTCC, the facility which stores the flight plans for DTW, the time limit is three hours. Therefore, a dispatcher in Atlanta may be unaware that an existing previously submitted

flight plan is still active in DTW and may erroneously enter a new one assuming that the previously filed plan had expired.

To complicate the issue further, each ARTCC has a different deadline for allowing amendments to a flight plan prior to the printing of the flight strip. After this deadline, amendments are no longer allowed. Cleveland has imposed the most restrictive deadline of 90 minutes. Atlanta and New York allow amendments up to 45 minutes prior, and Chicago allows amendments up until only 37 minutes prior. Our investigation found that the earlier a facility imposes deadlines for amendments to flight plans the higher the likelihood that the facility will receive duplicate flight plans because earlier deadlines make it tougher for airlines to make adjustments due to rapidly changing factors such as sudden, severe weather. A dispatcher need only modify one field in the flight plan and a second flight plan can be filed.

We substantiated that some airlines and other users have procured software to file flight plans which does not allow for amendments to be filed. The feature allowing amendments to flight plans is a software option that was not purchased by some operators. Thus, the users are forced to file a new flight plan if they want to make a change. As there is no regulatory guidance regarding the filing of flight plans, and the agency has not imposed a standard for when flight plans expire, the FAA has no ability to enforce the existing protocol.

Since late 2012, the FAA has assigned personnel to identify the cause of the problem and determine effective corrective actions as part of a working group. Other than the education of dispatchers, the group has had little impact. Reassignment of group members, other work projects, as well as a major re-organization within the Air Traffic Organization (ATO) coupled with delayed responses for suggested corrective action kept the group from reaching consensus on how best to resolve the problem. Additionally, it appears that some ATO senior officials either were not aware of, or did not perceive the significance of the problem.

Software changes to ERAM could be made to prohibit duplicate flight plans with the same call sign and departure airport to be entered into the NAS. The lead time and costs to implement these changes have yet to be determined.

We did not substantiate the allegation that DTW has not had an Operations Manager (OM) since 2009. We found DTW's OM was in place until 2012. In 2012, the individual was promoted to the position of DTW Air Traffic Manager, as part of a reorganization of DTW and the Detroit Terminal Radar Approach Control (TRACON). Our investigation did not substantiate that the elimination of a single manager position at DTW was a safety hazard.

## **Findings and Details**

**Allegation #1: FAA management has failed to properly address frequent and systemic problems with computer based systems designed to automate the filing and amending of flight plans and delivery of departure clearances.**

**Findings:** Substantiated

### Duplicate flight plans:

We found that a lack of standardized procedures in processing flight plans has compounded a problem created by air carrier dispatchers and filers when they enter multiple flight plans for the same flight. Duplicate flight plans contain the same aircraft identification and departure airport, but some elements such as requested altitude, routing, speed, aircraft type, aircraft equipage, or departure time are different from the original. We found that air traffic control facilities across the NAS are encountering this problem on a regular basis, and it is more problematic during adverse weather conditions. This issue has been reported at Air Traffic Control Towers (ATCT) in Detroit, Charlotte, San Diego, Minneapolis and Philadelphia, and the Boston ARTCC.

The current process allows airlines to store and distribute flight plans for regularly scheduled flights automatically. Airline dispatchers and filers can typically make amendments to flight plans for equipment changes or route changes around weather prior to the flight strip being transmitted to the ATCT. Typically, 30 minutes prior to the proposed departure time, these flight plans are transmitted to the ATCT and a flight strip is printed. Once a flight strip is printed, changes made to the flight plan from sources outside the FAA are then prohibited.

The current protocol requests that if a flight plan change needs to be made after a flight strip has been printed, then certain steps must be accomplished. The airline dispatcher should contact the Flight Data position in the ARTCC or in some cases the Traffic Management Unit (TMU) in the ATCT and ensure that the aircraft is in a position to accept a flight plan amendment. A good position would be at the airline gate. A bad position would be while the aircraft is taxiing for takeoff. If the aircraft can accept a flight plan change, the airline should communicate the change to the Flight Data or Traffic Management controller who can input the change into the NAS and ensure that the aircraft receives the new clearance.

While this is ideal, it is much easier for an airline dispatcher to enter a new flight plan and hope that the controller recognizes that a duplicate flight plan exists and that the controller ensures that the aircraft receives the correct flight plan. This can be very difficult for the controller to accomplish during periods of severe weather when airline dispatchers are attempting to reroute large numbers of aircraft around weather.

Duplicate flight plans introduce a safety risk into the air traffic system with potentially conflicting information being used by air traffic control and the pilots. When multiple flight plans are filed, there is the potential that a controller can issue "cleared as filed" based on a flight plan that is different than the flight plan most recently filed by the operator, resulting in the pilot flying a route different than expected by ATC. We also found that the FAA has no current automation system capable of identifying or "flagging" these multiple flight plans and notifying the controller.

Analyses of flight plans being sent from the airline filers to the NAS HOST and ERAM automation systems indicates that some airline filers (dispatchers) may not be following proper protocols, and instead of requesting that the FAA to amend existing flight plans, they are entering new flight plans without calling the FAA to have the original flight plan removed, as current protocol suggests. In some instances, we learned that some airlines did not purchase the

software option that allows the users to make amendments up to 30 minutes prior to departure. Finally, the FAA has no statutory authority to enforce the protocols regarding the filing of flight plans.

DTW has reported 43 duplicate flight plans from January 1, 2014 to March 18, 2014. From January 1, 2013 to December 1, 2013 (December appears not to have been tracked), DTW reported 288 duplicate flight plans. In December 2012 when DTW first began tracking the issue, they reported 60 just for the month of December. Attempts to elevate the issue to higher levels have thus far failed to correct this problem.

If an aircraft is equipped to receive Pre-Departure Clearances, the system transmits the original flight plan and clearance limit to the aircraft. If a duplicate flight plan is entered by the airline, the PDC system alerts the controller that a revision to a flight plan has been made via a notation reading REV. Controllers are then required to conduct a review of information of the flight progress strip, and issue a Full Route Clearance (FRC), but PDC does not allow them to interact or edit the flight plan to resolve the issue. This requires a verbal transmission of the entire clearance to the pilot and having the clearance read back correctly to the controller. In dealing with international flights with lengthy flight plans and with pilots for whom English is a second language, this can take considerable time, (up to 15 minutes for oceanic routes), and radio-transmitted clearance delivery and verbal read-backs increase the probability of a misunderstanding. Misunderstood clearances could lead to flight plan deviations and potential losses of separation.

The complainants suggested that the problem is related to the Flight Data Input/Output (FDIO) and the PDC system. However, we found that those systems are performing as designed, and the problem is primarily caused by airline dispatchers who have found ways to bypass the existing protocols.

A user files a flight plan, and it is sent to the legacy system called National Airspace Data Interchange Network (NADIN), which transmits flight plans to the legacy HOST computer system, and to ERAM. NADIN's purpose is to store and forward aviation message data such as flight plans and amendments. The current system does not have the capability to validate the content of the messages that it processes. Once the messages are transmitted, neither HOST, nor ERAM can identify and filter out a duplicate flight plan. HOST was first operational in 1972 and is being phased out and replaced by ERAM. A dispatcher need only make a single modification such as estimated en-route time by one minute and that simple change will generate a new flight plan. A controller will receive both flight plans, although not necessarily in the order that they were filed.

January 23, 2014 event:

The complainants expressed concern regarding an incident in which the controllers received notification of an amended route, with a revision number on the amendment; however the remark section of the flight plan failed to indicate the need for a Full Route Clearance (FRC). FAA Order 7110.65 4-3-3-(4) (b) states that an FRC is necessary if it is necessary to modify a previously filed flight plan.

In the January 23, 2014 event, the controller noticed the missing remark and called the Cleveland Air Route Traffic Control Center (ARTCC) to ask why the route had been amended without an "FRC" in the remarks. The ARTCC indicated they had not amended the route. The controller then called the associated dispatch supervisor. The supervisor confirmed that they had amended the route, but expressed confusion about why the flight plan had not been removed and a new flight plan entered.

The system allows either the filer or the ARTCC to amend the flight plan prior to a locally set time, and that protocol requires them to place FRCs in the remarks section. However, due to human error, this was not done. Because a change was made, the automation system merely pushed the new amended version through.

#### PDC Alert and Notifications:

The complainants identified instances in which erroneous alert notifications are displayed on the PDC system. For example the PDC will occasionally post an alert of a revision, when the facility has no associated flight plan. Other examples include revision alerts for flights that have already departed, alerts when no actual revision has occurred, or for altitude/type aircraft/suffix changes. A number of these alerts have been attributed to software "bugs" in the new ERAM software. Most of these have been eliminated once they were identified.

These types of anomalies are time-consuming to track down and occur because the software does not allow modifications of the original flight plan, and even the slightest change (e.g. departure time, altitude, etc.) generates an entirely new flight plan without deleting those previously filed. Additionally, flight plans can be filed up to 24 hours in advance and are stored in NADIN. It is possible that flight plans are filed and stored, a slight change occurs, and NADIN transmits both to the ARTCC. As previously indicated, NADIN is simply a data storage point and does not have the capability to validate the data it receives.

#### Actions taken by FAA:

In late 2012, the issue regarding the duplicate flight plans was elevated to FAA officials at Headquarters by DTW. The complaint identified the issue as a PDC automation issue. A working group of individuals was formed in 2012 and determined that the issue was not a PDC issue specific to DTW, but was a system issue across the NAS.

The group initially attempted to identify the airline dispatchers and filers not following the published International Civil Aviation Organization (ICAO) protocol and contacting them directly. They also initiated a monthly teleconference to address the issue with over 100 participants including airline representatives responsible for filing flight plans.

An automation specialist began exploring possible solutions through ERAM to reject duplicate flight plans, as well as other potential solutions. However, the group also needed to consider possible reasons for a need to continue to accept duplicates. A meeting was held on October 28, 2013 with Department of Defense (DOD) liaisons assigned to FAA as to whether they had



objections to rejecting duplicate flight plans. DOD responded in January 2014 in a letter to FAA, from Steven Pennington, Executive Director, DOD Policy Board on Federal Aviation. The DOD recommended that FAA enforce existing protocols in order to mitigate duplicate flight plans, apparently not recognizing the limits of the agency's statutory authority to enforce the agreed upon protocols.

The National Air Traffic Controllers Association (NATCA) submitted a proposal to the working group that suggested a notification strategy be implemented that alerts controllers regarding duplicate aircraft identifications. NATCA proposed that the FDIO display, which prints flight progress strips, be modified to recognize duplicate flight numbers and should also print a message on the flight progress strip indicating that duplicate status. The message could be in a format closely resembling what controllers now see on the FDIO displays when they send a flight plan readout message.

As of March 5, 2014 and April 2, 2014, (the last two teleconference meetings of the flight plan filing work group), briefings were sent to over 100 users from industry, the military and FAA identifying the problem of duplicate flight plans. The working group proposed that the best intermediate corrective action is to ensure that there is a well-defined process for modifying flight plans, including within 30 minutes of departure, when the operator cannot make changes via the Automated Fixed Telecommunications Network (AFTN). Additionally, the group indicated that the FAA needs to tighten rules in the automation for acceptance of proposed flight plans with the same aircraft identification (call sign) to ensure that duplicates are not stored for the same flight. The group committed to work with Air Traffic Services to determine the best way to handle changes within 30 minutes of departure.

The long-term resolution to the problem would be for the system to not allow multiple flight plans in proposal status that contain the same aircraft flight information. This requires significant technical and training obstacles and may have a negative impact on DOD operations, as well as some small air carriers, which often file multiple flight plans using the same aircraft identification and departure point but for different flights (e.g., short commuter flights.)

**Allegation #2: FAA management has failed to properly staff the facility by leaving the Operations Manager position unfilled for approximately five years.**

**Findings:** Unsubstantiated.

The complainants all expressed concern that DTW is the only level 11 facility in the NAS which does not have an Operations Manager (OM). They claimed that this has been the case since approximately 2009. In our interviews, the complainants did not allege that this was an unsafe situation. Several of the complainants told us they have never worked in a facility that had an OM and were not familiar with the duties of an OM, but all stated that a single person devoted to the tower's operations would only enhance the facility and communications between the tower and TRACON and the Terminal District Manager.

Contrary to the allegation that the OM position had been vacant since 2009, we found that the current DTW Air Traffic Manager (ATM) was the DTW OM until 2012, when he was promoted to his present position. The promotion was part of a reorganization in which DTW and the Detroit Terminal Radar Approach Control (TRACON) were divided into two separate facilities located in the same building. While the TRACON kept both an OM and a Support Manager position, DTW had only a Support Manager, who was already in place.

In the current ATO staffing model, when a level 11 air traffic tower shares the same building space as the TRACON, the tower will have the choice of a Support Manager or an OM, at the preference of the ATM. The tower will not be allocated both positions because it has been determined that both are no longer necessary when towers and TRACONs are co-located, and management functions can be shared by both operations in the same building. DTW is one of only two level 11 facilities in the NAS where both the tower and the TRACON each have an ATM located in the same building. The other facility is Minneapolis, which chose an OM in lieu of a Support Manager. Practically speaking, the two management functions have significant overlap. This staffing model does not apply to level 11 stand-alone towers, where management responsibilities cannot be apportioned between two facilities in the same building.

ATO officials also told us due to continued budget constraints, they are required to streamline manager positions, and this will require the elimination of approximately 200 management positions in the NAS. Across the NAS, facilities co-located in the same building will be expected to share resources such as quality assurance, training and policy/procedures.

DTW has an ATM and a Support Manager who are devoted exclusively to the tower's operation. The OM and Support Manager functions are being combined in facilities where a tower and TRACON are co-located in the same building. Moreover, the volume of traffic at DTW has declined over the last several years as a result of the Delta and Northwest Airlines merger. Our investigation did not substantiate that the elimination of a single manager position at DTW was a safety hazard. Lastly, between the co-located tower and the TRACON operations, there are more managers at DTW combined, who are available to oversee coordination between the two operations than there are managers in stand-alone level 11 towers.

## **Recommendations**

1. The ATO needs to establish a standardized time across the NAS in which flight plans are active. This can be flexible during periods of bad weather, but even the extension of the active flight plan itself should have a standardized amount of time.
2. The ATO should standardize the time for when amendments to flight plans are prohibited from external sources.
3. The ATO needs to determine whether and how it will accept changes to flight plans within 30 minutes of departure.

4. The ATO should consider re-installing equipment at DTW needed to open a second clearance delivery (CD2) position during periods of bad weather. Currently, Flight Data and Clearance Delivery are combined, and in peak times, the cab coordinator assists. This takes the cab coordinator's attention away from the actual operation of aircraft. According to Mr. Sugent, the cab is configured and previously had a CD2 position, but the equipment was moved to the TRACON and Aerobahn, a system used to monitor congestion at the gates was installed in the CD2 location.
5. The ATO should convene a Safety Risk Management Panel to identify hazards and analyze risk associated with duplicate or multiple flight data for the same flights. This SRM Panel should include representatives from FAA and airline stakeholders who can determine ways to mitigate the risks and monitor actions taken to ensure they are effective. The outcome from the panel should be a published, accountable process for the airlines and FAA to follow and should include any necessary changes in our automation, policy and procedures needed to ensure accountability while reducing risk.
6. The ATO should continue to track and identify the top air carrier offenders and continue frequent education and training. During the monthly Flight Plan Filer's Teleconference, discussion of the frequent offenders and significant events caused when controllers fail to catch the duplicate flight plan should be included. These real world events may educate the filers/users as to the importance of following FAA's protocol.

In response to these recommendations, the ATO has developed a Corrective Action Plan. It is included as Appendix A.

## Methodology

With Subject Matter Expertise from ATO's Safety and Technical Training (AJT), during the week of March 24-27, 2014, the investigative team traveled to Detroit. They spoke with 17 individuals, including the complainant, the air traffic tower manager, frontline managers, and personnel from FAA headquarters. We reviewed hundreds of problem reports generated by DTW personnel, emails, briefings, ICAO protocols and data collected by personnel assigned to the FAA Headquarters working group. The 17 Individuals interviewed by the team included:

Vincent Sugent, Complainant and Air Traffic Controller  
John Overman, Complainant and Air Traffic Controller  
Corinna Morris, Complainant and Air Traffic Controller  
Michael Redies, Complainant and Air Traffic Controller  
Lewis "Matt" Bird, Complainant and Air Traffic Controller  
John Whitehurst, Detroit Air Traffic Controller Tower Manager  
Joseph Figliuolo, Terminal District Manager, Detroit HUB  
Sonny Smithwick, Dispatch Aviation Safety Inspector, Delta Airlines Certificate Management Office  
Nick Perrazza, Contractor, NADIN Support and Development  
Juan Fuentes, Senior Advisor, Air Traffic Services  
Kevin Grammes, Operations Manager, Detroit TRACON  
Rodney Harris, Detroit Tower Support Specialist  
Paul Mueller, Frontline Manager, Detroit Tower  
Steve Scrimsher, Frontline Manager, Detroit Tower  
Joel Brown, Contractor/Senior Air Traffic Control Specialist, ATO Mission Support Services  
Ray Ahlberg, En-Route Requirements, ATO Mission Support Services  
David W. Swanson, Airspace Team, ATO Mission Support Services

# Appendix A

## Corrective Action from ATO



## Federal Aviation Administration

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### Memorandum

Date: APR 22 2014

To: H. Clayton Foushee, Director, Audit and Evaluation, AAE-1

From: *Teri Bristol*  
Teri Bristol, Chief Operating Officer, Air Traffic Organization, AJO-0

Subject: ATO Response to Office of Audit and Evaluation investigation for the U.S. Office of Special Counsel (OSC), File# DI-13-4206, DI-14-0359, DI-14-0461, DI-14-0492, and DI-14-1590

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As a result of the Office of Audit and Evaluation investigation for the U.S. Office of Special Counsel (OSC), File# DI-13-4206, DI-14-0359, DI-14-0461, DI-14-0492, and DI-14-1590 the Air Traffic Organization (ATO) is providing this corrective action plan (CAP) to address findings associated with duplicate flight plans.

**Allegation:** FAA management has failed to properly address frequent and systemic problems with computer based systems designed to automate the filing and amending of flight plans and delivery of departure clearances.

**Background:** The ATO established a Flight Plan Work Group in 2012 to address expectations and requirements associated with policy changes and automation upgrades that generated unexplained flight plan outcomes. This group has taken action to address the risks associated with duplicate flight plans and other flight plan issues identified by facilities, carriers, and safety reports. Communications through participant members of the group has helped all parties understand some current limitations of automation, but does not appear to have reduced the number of duplicate flight plans appearing in the NAS. In August 2013, the group briefed carriers and the major associations representing business aviation and general aviation that duplicate flight plans were associated with safety risk and increased controller workload that directly affected FAA efficiency. The group meets monthly, and is now supporting the ATO's response to the Office of Audit and Evaluation (AAE) following the referral from OSC on March 11, 2014.

**National Corrective Action Plan (CAP):**

The ATO will evaluate the best way to address the problem of multiple/duplicate flight plans. This includes how both manual and automated processes can prohibit multiple active flight plans for the same aircraft. The agency must also consider any unintended consequences which might occur as a result of an automation fix. In the interim, the ATO has planned the following actions:

- The ATO will immediately establish a Duplicate Flight Plan Task Force from the work group that was formed in 2012. Members of this Task Force will be identified in a memorandum signed by the appropriate Vice President by May 2, 2014. The purpose of the task force is identify actions to address the risks associated with duplicate flight plans that will respond to each of the recommendations found in the attached report of investigation.
- The Task Force will deliver documented, accountable processes for industry and FAA to follow. These processes may also include any necessary changes to our automation, and/or policy and procedure changes needed to ensure accountability and reduce risk. Final recommendations will be delivered to a Safety Risk Mitigation Panel (SRMP) no later than May 19, 2014.
- The ATO will convene a SRMP no later than June 20, 2014, comprised of key stake holders including: Mission Support (AJV), En-Route Automation Modernization Program Management Office (AJM), Air Traffic Services (AJT), Technical Operations (AJW), Flight Standards Service (AFS), Department of Defense (DOD), National Air Traffic Controllers Association (NATCA), and industry representatives identified by System Operations (AJR).
  - The SRMP will evaluate the following:
    1. Standardize time across the NAS in which flight plans are active. This can be flexible during periods of bad weather, so long as the application of standard times follow a protocol that is published, trained, and understood by the users. The extension of the active flight plan itself should have a standardized time limit.
    2. Standardize the time for when flight plans are transmitted to tower/TRACON facilities from the ARTCC.
    3. Determine whether and how to accept changes to flight plans within 30 minutes of proposed departure, and what “cut-off time” is reasonable to prohibit flight plan amendments.
    4. Review automation requirements for possible improvements to safety, efficiency and reliable flight plan processing.
- The results of the SRMP will be published by July 1, 2014
- In addition, facilities will begin a formal reporting process that results in individual flight plans that appear to violate the revised FAA policies. The reporting process and necessary tools to accumulate reports will be completed by July 1, 2014.
- System Operations (AJR) will receive the accumulated reports of duplicate flight plans and report the results by carrier (and NAS user group) once a month at the National Customer Forum (NCF) beginning in September 2014.
- Automation changes have been studied, but none of the alternatives identified thus far fully satisfy the flight plan requirements. Mission Support (AJV-7) will reevaluate the recommended mitigations from the SRMP and determine if any automation requirements pertain to this CAP by October 1, 2014.

- Safety and Technical Training (AJT) will conduct an audit of the duplicate flight plan reports by December 31, 2014 and report their findings to AAE. If improvements are not apparent for the period July – December 2014, audits will continue until improvement is visible.

**Detroit Tower (DTW) Specific Corrective Action Plan (CAP):**

- DTW will incorporate and adhere to all of the corrective actions described above.
- Air Traffic Services (AJT) will survey the tower-cab at DTW and consider if any impediments to re-installing equipment are needed to open a second clearance delivery (CD2) position during periods of bad weather. A feasibility report that identifies an inventory of available equipment, materials and hardware necessary to complete the second clearance delivery position, procedural change requirements, training requirements, and staffing considerations will be delivered by July 1, 2014.
- The ATO will consider the AJT report on opening a second clearance delivery position at DTW under those conditions identified by DTW management, and provide AAE with their decision and schedule (if implementation is confirmed to be desirable) by Oct. 1, 2014.

**Attachment:**

April 17, 2014, FAA Report of Investigation to the Secretary of Transportation; U.S. Office of Special Counsel (OSC), File# DI-13-4206 et al.