



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of the Administrator

800 Independence Ave., S.W.  
Washington, D.C. 20591

APR 22 2008

The Honorable Patty Murray  
Chairman, Subcommittee on Transportation, Housing and  
Urban Development, and Related Agencies  
United States Senate  
Washington, DC 20510

Dear Madam Chairman:

Thank you, again, for the opportunity to appear before the Subcommittee to discuss the Federal Aviation Administration's 2009 budget request. I know we share the same commitment to funding FAA programs to assure the flying public that the National Airspace System will run safely and efficiently.

In response to your request for information on air carrier oversight assessments that have not been completed in 5 year intervals, I provide the following information.

The Air Transportation Oversight System (ATOS) was implemented by the FAA in the late 1990's. At the time of transition, we moved only 10 major air carriers into the system and we accepted that the carriers' existing systems met regulatory requirements. The guidance we provided our inspectors recommended – but did not require – that the system design assessments be completed within 5 years.

For each carrier, there are 106 system design assessments covering areas such as aircraft airworthiness, major repairs and alterations, manual currency, and flight crew training.

A review of our data as of April 21, shows that 8 of the 117 carriers participating in ATOS have a total of 103 system design assessments exceeding the recommended 5-year period. The number of assessments not performed ranges from a high of 30 at one carrier to a low of 2 at another carrier. Twenty-nine of these assessments are in progress and will be completed by June 30, 2008. Over 30 additional assessments are scheduled to be completed before the end of this calendar year. The remainder of assessments are scheduled to be performed over the next several years, depending on the level of risk they pose. Again, these system design assessments were recommended, but not required.

I can not provide definitive data on why these inspections were deferred because the automated data collection system we used at the time did not require inspectors to document the reasons for delay. However, it is likely these system design assessments were not

completed because inspectors were assessing the performance of the systems and the data indicated the system performed properly and therefore was adequately designed. It is also possible that some of the system design assessments were not performed due to inadequate resources. In the early years of implementation of this program resources in the Aviation Safety (AVS) organization fluctuated. In the last several years, due to support from the Administration and Congress, AVS resources have grown substantially, which allows us to better manage our oversight program.

As of December 2007 all Part 121 carriers (at the time there were 117) were moved into the ATOS system. With that implementation, we introduced a new version of the ATOS automation that requires the principal inspector to document why an assessment is delayed – even if the reason is a lack of resources. This enhancement will allow senior managers to monitor inspections on a national basis, review the reasons for deferral and, if necessary, change inspection priorities or provide additional resources. In addition, the system will automatically schedule all design assessments every five years – although it will permit deferral with a documented reason.

If I can be of further help, please contact me or Ms. Megan Rosia, Assistant Administrator for Government and Industry Affairs, at (202) 267-3277.

Sincerely,



Robert A. Sturgell  
Acting Administrator

American (26 overdue)

	<u>Last</u>	<u>Risk</u>	<u>Priority</u>	<u>Status</u>
1.1.1 Aircraft Airworthiness	3/27/2002	117	2	On-going
1.1.2 Appropriate Operational Equipment	10/15/1999	28	40	
1.2.1 Airworthiness Release / Logbook Entry	3/26/2003	60	21	2008
1.2.3 Maintenance Log / Recording Requirements	3/26/2003	56	28	
1.2.6 Aircraft Listing	10/31/2002	28	43	
1.3.1 Maintenance Program	5/14/2002	68	14	On-going
1.3.3 Maintenance Facility / Main Maintenance Base	9/28/2000	66	15	2008
1.3.5 MEL / CDL / Deferred Maintenance	6/13/2001	62	19	2008
1.3.8 Control of Calibrated Tools and Test Equipment	4/18/2002	62	20	2008
1.3.9 Engineering / Major Repairs and Alterations	3/22/2001	93	7	On-going
1.3.10 Parts / Material Control / SUP	5/9/2002	70	12	On-going
1.3.16 Fueling	2/7/2002	64	16	On-going
1.3.17 Weight and Balance Program	2/27/2001	56	30	
1.3.18 De-icing Program	3/30/2000	64	17	2008
1.3.21 Parts Pooling	4/14/03	28	45	
1.3.22 Parts Borrowing	4/14/03	28	46	
2.1.5 Supplemental Operations Manual Requirements	7/17/2000	56	36	
4.1.2 Maintenance Certificate Requirements	2/14/2003	28	48	
4.2.1 Maintenance Training Program	6/7/2001	60	24	2008
4.2.2 RII Training Requirements	10/29/2002	58	25	
4.4.1 Recency of Experience	2/6/2003	28	49	
4.4.2 Display of Certificate	2/6/2003	28	50	
4.4.3 Privileges Airframe and Powerplant	2/6/2003	28	51	
4.4.4 Privileges and Limitations for Repairmen	2/6/2003	28	52	
7.1.1 Director of Maintenance	3/20/2002	28	53	
7.1.2 Chief Inspector	3/20/2002	29	39	

Alaska (13 overdue)

	<u>Last</u>	<u>Risk</u>	<u>Priority</u>	<u>Status</u>
1.2.4 MIS Reports	1/31/2003	28	40	
1.3.23 Short-Term Escalations	3/20/2003	56	28	
1.3.24 Coordinating Agencies for Suppliers Evaluation (CASE)	2/28/2003	28	45	
2.1.1 Manual Currency (AW)	1/30/2003	56	29	
2.1.1 Manual Currency (OPS)	1/30/2003	56	15	

Alaska (continued)

	<u>Last</u>	<u>Risk</u>	<u>Priority</u>	<u>Status</u>
2.1.2	Content Consistency Across Manuals	1/30/2003	56	30
2.1.3	Distribution (Manuals) (AW)	1/30/2003	56	31
2.1.3	Distribution (Manuals) (OPS)	2/3/2003	54	23
2.1.4	Availability (Manuals) (AW)	1/30/2003	56	32
2.1.4	Availability (Manuals) (OPS)	1/30/2003	54	24
3.1.1	Passenger Handling	3/22/2001	66	8
3.1.11	Computer Based Record Keeping System	5/22/2002	27	35
5.1.6	Use of Approved Areas, Routes and Airports	1/4/2000	28	33

**Continental (2 overdue)**

	<u>Last</u>	<u>Risk</u>	<u>Priority</u>	<u>Status</u>
1.3.14	General Maintenance Manual / Equivalent	1/10/2003	28	42
4.3.3	Advanced Qualification Program (AQP)	3/24/2003	54	32

**Delta (6 overdue)**

	<u>Last</u>	<u>Risk</u>	<u>Priority</u>	<u>Status</u>
1.1.2	Appropriate Operational Equipment	No date	28	40
1.2.3	Maintenance Log / Recording Requirements	10/18/2001	68	15
1.3.10	Parts / Material Control / SUP	8/10/2001	56	9
1.3.18	De-icing Program	3/25/2003	56	35
2.1.4	Availability (Manuals)	1/24/2002	56	38
7.1.4	Director of Operations	7/17/2002	27	22

**Northwest (2 overdue)**

	<u>Last</u>	<u>Risk</u>	<u>Priority</u>	<u>Status</u>
3.1.3	Airmen Duties / Flight Deck Procedures	3/31/2003	99	1
5.1.7	Special Navigation Areas of Operation	6/6/2002	28	33

**Southwest (9 overdue)**

	<u>Last</u>	<u>Risk</u>	<u>Priority</u>	<u>Status</u>
1.2.3	Maintenance Log / Recording Requirements	1/25/2002	170	13
3.1.1	Passenger Handling	1/15/2003	54	19

Southwest (continued)

	<u>Last</u>	<u>Risk</u>	<u>Priority</u>	<u>Status</u>
4.1.2	6/8/1999	58	35	On-going
4.2.2	4/9/1999	56	42	On-going
4.4.1	3/12/2003	58	36	On-going
4.4.3	8/16/1999	33	49	On-going
7.1.1	6/27/2002	58	37	On-going
7.1.2	6/28/2002	58	38	On-going
7.1.3	6/1/1999	83	32	On-going

United (15overdue)

	<u>Last</u>	<u>Risk</u>	<u>Priority</u>	<u>Status</u>
1.1.2	No date	30	34	On-going
1.2.1	3/28/2002	56	26	On-going
1.3.1	1/18/2000	64	15	On-going
1.3.12	4/22/1999	56	31	2008
1.3.18	7/29/1999	56	33	On-going
1.3.19	8/21/1999	56	34	On-going
1.3.21	5/8/2002	28	47	2008
1.3.22	5/8/2002	28	48	2008
3.1.10	9/8/1999	27	35	On-going
3.1.11	No date	27	36	2008
4.2.10	5/1/2000	27	37	2008
4.3.1	No date	54	29	On-going
4.3.2	5/1/2000	54	30	On-going
7.1.1	9/22/1999	30	41	On-going
7.1.2	5/13/1999	31	40	2008

US Airways (30 overdue)

	<u>Last</u>	<u>Risk</u>	<u>Priority</u>	<u>Status</u>
1.1.3	1/30/2002	60	30	On-going
1.3.11	2/25/2003	114	9	2008
1.3.13	1/1/19/1999	56	35	2008
1.3.14	12/15/1999	31	40	On-going
1.3.20	1/31/2002	62	28	On-going
1.1.2	No date	28	36	

US Airways (continued)		<u>Last</u>	<u>Risk</u>	<u>Priority</u>	<u>Status</u>
1.3.21	Parts Pooling	6/6/2002	34	38	2008
1.3.22	Parts Borrowing	5/14/2002	34	39	
1.3.23	Short-Term Escalations	5/30/2002	60	32	2008
1.3.24	Coordinating Agencies for Suppliers Evaluation (CASE)	7/1/2002	28	49	
2.1.1	Manual Currency	2/24/2003	56	36	2008
2.1.3	Distribution (Manuals)	12/16/2002	58	33	On-going
3.1.9	Aircraft Performance Operating Limitations	9/29/1999	54	25	On-going
3.1.10	Lower Landing Minimums (LLM)	5/11/1999	27	40	
4.2.3	Training of Flight Crewmembers	1/25/2001	56	18	On-going
4.2.6	Training of Station Personnel	2/28/2003	56	19	2008
4.3.1	Pilot Operating Limitations / Recent Experience	7/20/1999	54	29	On-going
5.1.6	Use of Approved Areas, Routes and Airports	1/13/2000	27	41	
5.1.7	Special Navigation Areas of Operation	3/25/2002	27	42	
5.1.8	Extended Range Operations with Two-Engine Airplanes (AW)	7/26/2002	84	15	On-going
5.1.8	Extended Range Operations with Two-Engine Airplanes (OPS)	9/9/2002	27	43	
5.1.9	RVSM Authorization	9/9/2002	27	44	2008
6.1.1	Scheduling / Reporting System	8/10/2000	28	39	2008
2.1.5	Supplemental Operations Manual Requirements	No date	56	37	
4.2.9	Outsource Crewmember Training	No date	54	28	
7.1.1	Director of Maintenance	11/7/2000	29	43	On-going
7.1.2	Chief Inspector	11/2/2000	30	42	On-going
7.1.3	Director of Safety	9/15/2000	29	44	On-going
7.1.5	Chief Pilot	2/22/1999	27	47	
7.2.1	Safety Program (Ground and Flight)	11/27/2001	54	34	2008

**Figure 10-6, ATOS System/Subsystem/Element Chart—Airworthiness Elements**

1.0 Aircraft Configuration Control		2.0 Manuals	
1.1 Aircraft		2.1 Manual Management	
1.1.1	Aircraft Airworthiness	2.1.1	Manual Currency
1.1.2	Appropriate Operational Equipment	2.1.2	Content Consistency Across Manuals
1.1.3	Special Flight Permits	2.1.3	Distribution (Manuals)
1.2 Records and Reporting Systems		2.1.4	Availability (Manuals)
1.2.1	Airworthiness Release/Log Book Entry	2.1.5	Supplemental Operations Manual Requirements
1.2.2	Major Repairs and Alterations Records		
1.2.3	Maintenance Log /Recording Requirements	<b>4.0 Personnel Training and Qualifications</b>	
1.2.4	Mechanical Interruption Summary Reports	4.1 Maintenance Personnel Qualifications	
1.2.5	Service Difficulty Reports	4.1.1	Required Inspection Item Personnel
1.2.6	Aircraft Listing	4.1.2	Maintenance Certificate Requirements
1.3 Maintenance Organization		4.2 Training Program	
1.3.1	Maintenance Program	4.2.1	Maintenance Training Program
1.3.2	Inspection Program	4.2.2	Required Inspection Item Training Requirements
1.3.3	Maintenance Facility/Main Maintenance Base	4.2.12	Hazardous Materials Training
1.3.4	Required Inspection Items	4.4 Mechanics and Repairmen Certification	
1.3.5	Minimum Equipment List/Configuration Deviation List/Deferred Maintenance	4.4.1	Recency of Experience
1.3.6	Airworthiness Directive Management	4.4.2	Display of Certificate
1.3.7	Outsource Organization	4.4.3	Privileges Airframe and Powerplant
1.3.8	Control of Calibrated Tools and Test Equipment	4.4.4	Privileges and Limitations for Repairmen
1.3.9	Engineering/Major Repairs and Alterations	<b>5.0 Route Structures</b>	
1.3.10	Parts/Material Control/Suspected Unapproved Parts	5.1 Approved Routes and Areas	
1.3.11	Continuous Analysis and Surveillance	5.1.1	Line Stations (Service & Maintenance)
1.3.12	Special Federal Aviation Regulation (SFAR) 36	5.1.2	Weather Reporting/Supplemental Aviation Weather Reporting System
1.3.13	Designated Alteration Station	5.1.3	Non-Federal Navigational Aids
1.3.14	General Maintenance Manual or Equivalent	5.1.4	Altimeter Setting Sources
1.3.15	Reliability Program	5.1.8	Extended Operations
1.3.16	Fueling	5.1.9	Reduced Vertical Separation Minimum
1.3.17	Weight and Balance Program	<b>6.0 Airman and Crew Flight, Rest, and Duty Time</b>	
1.3.18	Deicing Program	6.2 Maintenance Personnel	
1.3.19	Lower Landing Minimums	6.2.1	Maintenance Duty Time Limitations
1.3.20	Engine Condition Monitoring	<b>7.0 Technical Administration</b>	
1.3.21	Parts Pooling	7.1 Key Personnel	
1.3.22	Parts Borrowing	7.1.1	Director of Maintenance
1.3.23	Short-Term Escalations	7.1.2	Chief Inspector
1.3.24	Coordinating Agencies for Suppliers Evaluation	7.1.3	Director of Safety
1.3.25	Cargo Handling Equipment, Systems and Appliances	7.1.6	Maintenance Control

**Figure 10-7, ATOS System/Subsystem/Element Chart—Operations and Cabin Safety Elements**

1.0 Aircraft Configuration Control		4.0 Personnel Training and Qualifications	
1.1 Aircraft		4.2 Training Program	
1.1.2	Appropriate Operational Equipment	4.2.3	Training of Flight Crewmembers
		4.2.4	Training of Flight Attendants
2.0 Manuals		4.2.5 Training of Dispatchers	
2.1 Manual Management		4.2.6	Training of Station Personnel
2.1.1	Manual Currency	4.2.7	Training of Check Airman and Instructors
2.1.2	Content Consistency Across Manuals	4.2.8	Simulators/Training Devices
2.1.3	Distribution (Manuals)	4.2.9	Outsource Crewmember Training
2.1.4	Availability (Manuals)	4.2.10	Aircrew Designated Examiner Program
2.1.5	Supplemental Operations Manual Requirements	4.2.11	Training of Flight Followers
		4.2.12	Hazardous Materials Training
		4.3 Crewmember and Dispatch Qualifications	
3.0 Flight Operations		4.3.1 Pilot Operating Limitations/Recent Experience	
3.1 Air Carrier Programs and Procedures		4.3.2	Appropriate Airman/Crewmember Checks and Qualifications
3.1.1	Passenger Handling	4.3.3	Advanced Qualification Program
3.1.2	Flight Attendant Duties/Cabin Procedures	5.0 Route Structures	
3.1.3	Airman Duties/Flight Deck Procedures	5.1 Approved Routes and Areas	
3.1.4	Operational Control	5.1.5	Station Facilities
3.1.5	Carry-on Baggage Program	5.1.6	Use of Approved Routes, Areas and Airports
3.1.6	Exit Seating Program	5.1.7	Special Navigation Areas of Operation
3.1.7	Deicing Program	5.1.8	Extended Operations
3.1.8	Carriage of Cargo	5.1.9	Reduced Vertical Separation Minimum Authorization
3.1.9	Aircraft Performance Operating Limits	6.0 Airman and Crewmember Flight, Rest and Duty Time	
3.1.10	Lower Landing Minimums	6.1 Airman and Crewmember Limitations	
3.1.11	Computer-based Recordkeeping	6.1.1	Scheduling/Reporting System
3.1.12	Hazardous Materials	6.1.2	Flight Crewmember Flight/Duty/Rest Time
3.1.13	Other Personnel with Operational Control	6.1.3	Flight Attendant Duty/Rest Time
		6.1.4	Dispatcher Duty/Rest Time
		7.0 Technical Administration	
3.2 Operational Release		7.1 Key Personnel	
3.2.1	Dispatch or Flight Release	7.1.3	Director of Safety
3.2.2	Flight/Load Manifest/Weight and Balance Control	7.1.4	Director of Operations
3.2.3	Minimum Equipment List/Configuration Deviation List Procedures	7.1.5	Chief Pilot
		7.2 Other Programs	
		7.2.1	Safety Program (Ground and Flight)

**RESERVED.** Paragraphs 10-27 through 10-41.